



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 9, 2013

RE: Halstab Division of Hammond Group, Inc.

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

## Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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Jean Ziga  
Halstab Division of Hammond Group, Inc.  
2323 615<sup>th</sup> St.  
Hammond, IN, 46320

April 9, 2013

Re: 089-32648-00218,  
First Significant Revision to  
F089-14167-00218

Dear Ms. Ziga:

Halstab Division of Hammond Group, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F089-14167-00218 on June 16, 2005 for a stationary industrial organic and inorganic chemicals manufacturing plant located at 3100 Michigan St., Hammond, IN. On December 19, 2012, the Office of Air Quality (OAQ) received an application from the source requesting changes to the compliance testing dates for lead testing at Stacks S-12, S-15 and S-17. The attached Technical Support Document (TSD) provides additional explanation of the changes to the permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

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 James Mackenzie, of my staff, at 317-233-2641 or 1-800-451-6027, and ask for extension 3-2641.

Sincerely,

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

TPS/jwm

Attachments: Technical Support Document and revised permit

cc: File - Lake County  
Lake County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch  
Billing, Licensing and Training Section



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## Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Halstab Division of Hammond Group, Inc.  
3100 Michigan Street  
Hammond, Indiana 46323**

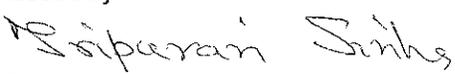
(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

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

Operation Permit No.: F089-14167-00218	
Original signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: June 16, 2005 Expiration Date: June 16, 2015

1<sup>st</sup> Administrative Permit Amendment: No.: 089-22698-00218, issued: March 15, 2006.  
1<sup>st</sup> Minor Permit Revision: No.: 089-23378-00218, issued: December 7, 2006.  
2<sup>nd</sup> Administrative Amendment: No.: 089-25805-00218, issued: January 25, 2008.  
3<sup>rd</sup> Administrative Amendment: No.: 089-28378-00218, issued: October 5, 2009  
4<sup>rd</sup> Administrative Amendment: No.: 089-29118-00218, issued: April 29, 2010  
5<sup>th</sup> Administrative Amendment: No.: 089-31429-00218, issued: February 23, 2012

1 <sup>st</sup> Significant Permit Revision No. 089-32648-00218	
Issued by:  Tripurari P. Sinha, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 9, 2013 Expiration Date: June 16, 2015

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D.3.4 Particulate Matter less than 10 microns in diameter (PM10)

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- D.14.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
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**Compliance Determination Requirements**

- D.14.4 Particulate Matter less than 10 microns in diameter (PM10)
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- D.15.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14][326 IAC 2-8-4]
- D.15.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]
- D.15.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.15.4 Particulate Matter less than 10 microns in diameter (PM10)
- D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

- D.15.6 Visible Emissions Notations
- D.15.7 Parametric Monitoring
- D.15.8 Broken or Failed Bag Detection

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.15.9 Record Keeping Requirements

**SECTION D.16 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY**

**Stack ID S-16: Blended Product Handling System .....**

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

D.16.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14][326 IAC 2-8-4]

D.16.2 Lead (Pb) [326 IAC 15-1-2] [326 IAC 2-8-4]

D.16.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.16.4 Particulate Matter less than 10 microns in diameter (PM10)

D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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

D.16.6 Visible Emissions Notations

D.16.7 Parametric Monitoring

D.16.8 Broken or Failed Bag Detection

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.16.9 Record Keeping Requirements

**SECTION D.17 FACILITY OPERATION CONDITIONS – TRIVIAL ACTIVITY**

**Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System..... 78**

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

D.17.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 2-8-4]

D.17.2 Lead (Pb) [326 IAC 2-8-4]

D.17.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

D.17.4 Visible Emissions Notations

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

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## SECTION A

## SOURCE SUMMARY

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

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

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The Permittee owns and operates a stationary Industrial Inorganic and Organic Chemicals Manufacturing Plant.

Source Address:	3100 Michigan Street, Hammond, Indiana 46323
General Source Phone:	(219) 931-9360
SIC Code:	2819 – Industrial Inorganic Chemicals, nec 2869 – Industrial Organic Chemicals, nec
Source Location Status:	Lake County Attainment/Unclassifiable for PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub> , CO, NO <sub>2</sub> and Lead, Nonattainment for 8-hour ozone,
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

Note: Bin vent filters and bag filters located at Halstab are the same as or equivalent to baghouses. All of the baghouses are the reverse jet air pulse type and contain filter bags supported by wire cages.

(a) Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

(b) Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

(c) Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

(d) Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

(e) Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

(f) Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

(g) Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981. Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

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

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

(a) Stack ID S-3: Acid Dispersion System

Acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981. There are no emission controls on this unit.

(b) Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

(c) Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

(d) Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(e) Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

(f) Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996. Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

- (g) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (h) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (i) Combustion source flame safety purging on startup.
- (j) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (k) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (l) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (m) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (n) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 °F) or;
  - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 °C (68 °F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (p) Closed loop heating and cooling systems.
- (q) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 % by volume.
- (r) Any operation using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs.

- (s) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (t) Replacement or repair of bags or baghouses and filters in other air filtration equipment.
- (u) Heat exchanger cleaning and repair.
- (v) Process vessel degassing and cleaning to prepare for internal repairs.
- (w) Paved and unpaved roads and packing lots with public access. [326 IAC 6-4]
- (x) Conveyors as follows: Underground conveyors.
- (y) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (aa) Blowdown for any of the following: sight glass; boilers; compressors; pumps; and cooling tower.
- (bb) On-site fire and emergency response training approved by the department.
- (cc) Purge double block and bleed valves.
- (dd) Filter or coalescer media changeout.
- (ee) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (ff) Research and development activities as defined in 326 IAC 2-7-1(21)(E).

### Trivial Activities

The source also consists of the following trivial activities, as defined in 326 IAC 2-7-1(40):

- (a) Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981. Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.

- (b) Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

(c) Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981. Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

(d) Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981. Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

(e) Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981. Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

(f) Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981. Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

(g) Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981. Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

(h) Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emission units associated with Stack S-20 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 447).

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

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

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

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

## SECTION B

## General Conditions

### B.1 Permit No Defense [IC 13]

---

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

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

---

Terms in this permit shall have the meaning 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.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

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- (a) This permit, F089-14167-00218, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

### B.4 Enforceability [326 IAC 2-8-6]

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

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

### B.6 Severability [326 IAC 2-8-4(4)]

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

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

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

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

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

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (i) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (ii) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

The notification which shall be submitted by the Permittee does require a certification that

meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

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

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance

- The causes or is the primary contributor to an exceedance of any limitation on emissions. PMPs and their submittal does not require a certification that meets the requirements of 326 IAC 2-8-3(d) by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Emergency Provisions [326 IAC 2-8-12]**

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

Telephone No.: 1-800-451-6027  
(ask for Office of Air Quality, Compliance and Enforcement Branch) or,  
Telephone No.: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile No.: 317-233-6865

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

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

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

B.14 Reserved

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B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

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

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) 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.
  - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) and c without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under 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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15 (b)(1) and (c) and makes such records available, upon reasonable request, to public review.

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:  
  
Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

#### C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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The Permittee shall not operate an incinerator or incinerate any waste or refuse 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 9-1-1 or in this permit.

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

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The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Lake County Particulate Matter Contingency Measures [326 IAC 6-1-11.2]

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The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Stack Height [326 IAC 1-7]

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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.

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

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

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

#### **C.11 Performance Testing [326 IAC 3-6]**

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- (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.
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date.
- (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.12 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.13 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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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 meet the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

#### **C.14 Continuous Compliance Plan [326 IAC 6.8-8]**

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Pursuant to 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan), the Permittee shall submit to IDEM, OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring, and record keeping requirements as specified in 326 IAC 6.8-8 or according to the Permittee's CCP.

#### **C.15 Reserved**

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

#### **C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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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.17 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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;
  - (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.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

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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.

- (a) 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.
- (b) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

**C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
  - (BB) All original strip chart recordings for continuous monitoring instrumentation
  - (CC) Copies of all reports required by the FESOP.

Records of required monitoring information include the following:

- (AA) The date, place, as defined by this permit, and time of sampling or measurements.
- (BB) The dates analyses were performed.
- (CC) The company or entity that performed the analyses.
- (DD) The analytical techniques or methods used.
- (EE) The results of such analyses.
- (FF) The operating conditions as existing at the time of sampling or measurement.

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 with 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.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. 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 within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (d) Reserved.
- (e) 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.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

#### Stack ID S-6: Mill Line No. 1

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper.

Emissions units associated with Stack ID S-6 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 209) followed by a HEPA filter.

#### Stack ID S-7: Mill Line No. 2

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-7 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 236) followed by a HEPA filter.

#### Stack ID S-8: Mill Line No. 3

This line is used for milling dried products. Dried product is collected in a hopper then fed into a Mill in order to reduce the particle size as specified by the customer. Reduced material is graded through a cyclone and collected in another hopper. A rework station for the No. 3 Dryer is used to add material to the product stream feeding into either Mill Line No. 2 or 3.

Emissions units associated with Stack ID S-8 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 247) followed by a HEPA filter.

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

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

#### D.1.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.570 lbs/hr, per stack, which is equivalent to 2.497 tons/yr.

Compliance with above condition and Conditions D.1.1, D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.1.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.05 lbs/hr, per stack, which is equivalent to 0.22 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.2, the Permittee shall perform Pb testing on one of the mill line stacks, identified as S-6, S-7 and S-8, utilizing methods as approved by the Commissioner. These tests shall be repeated on a different stack 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 Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.1.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.1.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

- (a) In order to comply with Condition D.1.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the Stack IDs S-6, S-7, & S-8 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.1.8 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-6, S-7, & S-8, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-6)

Bag Filter No. 209: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 inches of water

(Stack ID S-7)

Bag Filter No. 236: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

(Stack ID S-8)

Bag Filter No. 247: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.10 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the Stack IDs S-6, S-7, & S-8 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.1.8, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

#### Stack ID S-12: Material Dump Station

Bags of material are dumped into a bulk / bagged material dump station.

Emissions units associated with Stack ID S-12 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 506) followed by a HEPA filter.

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

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

#### D.2.1 Lake County: PM<sub>10</sub> Emission Requirements (PM10) [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM10 emission requirements), the PM10 emissions from Stack ID S-12, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr.

Compliance with the above condition and Conditions D.1.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.2.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-12, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.6.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.2.2, not later than 180 days after the introduction of lead product to the Material Dump Station, the Permittee shall perform Pb testing on Stack ID S-12 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.2.5 Particulate Matter less than 10 microns in diameter (PM10)

---

- (a) In order to comply with Condition D.2.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.2.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.2.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.2.7 Visible Emissions Notations

---

- (a) Visible emission notations of the Stack ID S-12 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.2.8 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-12, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-12)  
Bag Filter No. 506: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.2.9 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.2.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.2.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-12 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.2.8, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

#### Stack ID S-14: Blend Scale Hopper

Material is conveyed from the material handling system and product handling systems to a surge hopper, weighed through a Blend Scale Hopper, and then fed into a blender or to a Bulk/Bag Packaging System.

Emissions units associated with Stack ID S-14 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 455) followed by a HEPA filter.

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

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

#### D.3.1 Lake County: PM<sub>10</sub> Emission Requirements (PM10) [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM10 emission requirements), the PM10 emissions from Stack ID S-14, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr.

Compliance with the above condition and Conditions D.1.1, D.2.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.3.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-14, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.3.4 Particulate Matter less than 10 microns in diameter (PM10)

- (a) In order to comply with Condition D.3.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the

expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.3.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.3.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.3.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-14 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.3.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-14, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-14)  
Bag Filter No. 455: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.3.8 Broken or Failed Bag Detection

---

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.3.9 Record Keeping Requirements

---

- (a) To document the compliance status with Condition D.3.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-14 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.3.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.4 FACILITY OPERATION CONDITIONS

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

#### Stack ID S-15: Blender

Material from the Blend Scale Hopper is fed to a Blend Product Hopper, blended, and then sent to a Blended Product Storage Hopper.

Emissions units associated with Stack ID S-15 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 301) followed by a HEPA unit.

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

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

#### D.4.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-15, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr.

Compliance with above condition and Conditions D.2.1, D.3.1, D.5.1, D.6.2, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.4.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-15, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.4.2, not later than 180 days after the introduction of lead product to the Blender, the Permittee shall perform Pb testing on Stack ID S-15 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.4.5 Particulate Matter less than 10 microns in diameter (PM10)

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- (a) In order to comply with Condition D.4.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.4.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.4.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.4.7 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-15 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, 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.4.8 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-15, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-15)  
Bag Filter No. 301: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.4.9 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.4.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.4.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-15 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.4.8, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.5 FACILITY OPERATION CONDITIONS

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

#### Stack ID S-17: Bulk/Bag Packaging System, Mixed Metals System, and Two (2) Portable Packing Stations

##### Unit ID: S-17-1: Bulk/Bag Packaging System

Product is loaded into either bulk containers or consumable bags for shipment.

Emissions units associated with Stack ID S-17 were installed in November, 1981. Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

##### Unit ID: S-17-2: Mixed Metals System

Products are fed into a dump station and transferred to a blender. The blender discharges to a pneumatic conveying line which transfers the blended product to a surge hopper which feeds the bulk/bag packaging stations. The surge hopper can also receive product directly from the Blended Product Handling System for packaging.

Emissions from this system are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

##### Unit ID: S-17-3: Two (2) Portable Packing Stations

Products from a portable tote bin are packaged in bags for shipment.

Emissions from each station are controlled by bag filter (No. 430) followed by a HEPA unit which then vents through Stack S-17.

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

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

#### D.5.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14(Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-17, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 1.990 lbs/hr which is equivalent to 8.716 tons/yr.

Compliance with above condition and Conditions D.2.1, D.3.1, D.4.1, D.6.2, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.5.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-17, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb

from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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In order to demonstrate compliance with Condition D.5.2, not later than 180 days after the introduction of lead product to the Bulk/Bag Packaging System and/or the Two (2) Portable Packing Stations, the Permittee shall perform Pb testing on Stack ID S-17 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

#### D.5.5 Particulate Matter less than 10 microns in diameter (PM10)

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- (a) In order to comply with Condition D.5.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.5.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.5.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.5.7 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-17 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.5.8 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-17, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-17)  
Exhaust Bag Filter No. 430: 0.1 - 5  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.5.9 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.5.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.5.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-17 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is

not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).

- (b) To document the compliance status with Condition D.5.8, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.6 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### Stack ID S-3: Acid Dispersion System

Dry acid is poured into a dispersion tank where water is added.

Emissions units associated with Stack ID S-3 were installed in November, 1981.  
There are no emission controls on this unit.

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

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

#### D.6.1 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>) FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.6.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.6.3 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-3 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

## **Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.6.4 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.6.4, the Permittee shall maintain records of visible emission notations of the Stack ID S-3 exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
  
- (b) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.7 FACILITY OPERATION CONDITIONS – INSIGNIFICANT ACTIVITY

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

#### Stack ID S-4: No. 1 Dryer

Reacted compound is conveyed to the dryer to evaporate off water.

Emissions units associated with Stack ID S-4 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 204) followed by a HEPA filter.

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

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

#### D.7.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-4, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 1.460 lbs/hr which is equivalent to 6.395 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.2, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.7.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-4, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.7.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.7.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.7.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.7.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.7.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.7.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-4 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.7.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-4, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-4)  
Bag Filter No. 204: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.7.8 Broken or Failed Bag Detection

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- (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 units has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emission unit. Operations may continue only if the event

qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.7.9 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.7.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-4 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.7.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.8 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### Stack ID S-5: Dryer No. 1 Containment System

This stack services the Dryer No. 1 containment system and rework unloading station. The containment system encloses the No. 1 Dryer and captures fugitive emissions in order to reduce employee exposure. The rework unloading station is used to feed rework material to the dryer discharge.

Emissions units associated with Stack ID S-5 were installed in November, 1981. Emissions from this system are controlled by a bag filter (No. 226) followed by a HEPA filter.

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

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

#### D.8.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-5, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 1.030 lbs/hr which is equivalent to 4.511 tons/yr

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.8.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-5, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.8.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.8.4 Particulate Matter less than 10 microns in diameter (PM10)

- (a) In order to comply with Condition D.8.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.8.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.8.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.8.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-5 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.8.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-5, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-5)  
Bag Filter No. 226: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.8.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.8.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.8.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-5 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.8.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.9 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### Stack ID S-18: Boiler No. 1

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

#### Stack ID S-19: Boiler No. 2

This natural gas fired boiler, installed in November, 1981, has a maximum design capacity of 2.5 MMBtu/hr. This boiler is used to heat water for the acid tanks and to provide steam for the reactors. There is no control equipment associated with this unit.

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

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

#### D.9.1 Particulate Matter (PM) Limitation [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emission from either Stack S-18 or Stack S-19 shall not exceed 0.01 grains per dry standard cubic foot (dscf).

#### D.9.2 PM<sub>10</sub> FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from Stack S-18 or Stack S-19 shall not exceed 0.171 lb/hr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.9.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

#### D.9.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.9.1, the Permittee shall maintain monthly records of the fuel usage for each boiler. These records shall be made available upon request by IDEM, OAQ.
- (b) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.10 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITY

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

#### Stack ID S-21: Dryer No. 3

Reacted compound is conveyed into a drying chamber to evaporate off water. The dried product is separated from the air stream in a product recovery baghouse.

Emissions units associated with Stack ID S-21 were installed in October, 1996. Emissions from this system are controlled by a product recovery baghouse (No. 805) and a HEPA filter.

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

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

#### D.10.1 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>) FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.10.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-21, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.07 lbs/hr which is equivalent to 0.31 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.10.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.10.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.10.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.10.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.10.3, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.10.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-21 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.10.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-21, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-21)

Baghouse: 0.1 – 10 inches of water

HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.10.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.10.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.10.7, the Permittee shall maintain records of visible emission notations of the Stack ID S-21 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.10.8, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## **SECTION D.11**

Reserved

## SECTION D.12 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### Stack ID S-1: Feedstock Handling System

Feedstock is pneumatically conveyed from bulk delivery trucks to a storage hopper, a weigh hopper and finally fed to a dispersion system.

Emissions units associated with Stack ID S-1 were installed in November, 1981.  
Emissions from this system are controlled by a bin vent filter (No. 121) followed by a HEPA filter.

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

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

#### D.12.1 Lake County: PM<sub>10</sub> emissions (PM<sub>10</sub>) [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14, (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-1, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.220 lbs/hr which is equivalent to 0.964 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.12.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-1, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.12.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.12.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.12.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.12.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.12.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.12.6 Visible Emissions Notations

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

#### D.12.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-1, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-1)  
Bin Vent Filter No. 121: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.12.8 Broken or Failed Bag Detection

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- (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 units has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.12.9 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.12.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-1 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.12.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.13 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### Stack ID S-2: Dispersion System

Feedstock is fed to a dispersion tank where it is mixed with water and acid and then fed to a reactor.

Emissions units associated with Stack ID S-2 were installed in November, 1981.

Emissions from this system are controlled by a bag filter (No. 115) followed by a HEPA filter.

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

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

#### D.13.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-2, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.080 lbs/hr which is equivalent to 0.350 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.13.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-2, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.03 lbs/hr which is equivalent to 0.13 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.13.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.13.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.13.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.13.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.13.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.13.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-2 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.13.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-2, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of the following:

(Stack ID S-2)  
Bag Filter No. 115: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.13.8 Broken or Failed Bag Detection

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- (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 units has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.13.9 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.13.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-2 stack exhaust once per day.
- (b) To document the compliance status with Condition D.13.7, the Permittee shall maintain records once per day of the total static pressure drop during normal operation when venting to the atmosphere.
- (c) To document the compliance status with Condition D.13.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.14 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### Stack ID S-9: Product Handling System No. 1

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-9 were installed in November, 1981.  
Emissions from this system are controlled by a bin vent filter (No. 317) followed by a HEPA filter.

#### Stack ID S-10: Product Handling System No. 2

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-10 were installed in November, 1981.  
Emissions from this system are controlled by a bin vent filter (No. 318) followed by a HEPA filter.

#### Stack ID S-11: Product Handling System No. 3

Graded product is pneumatically conveyed to a storage hopper prior to packing or blending with other materials.

Emissions units associated with Stack ID S-11 were installed in November, 1981.  
Emissions from this system are controlled by a bin vent filter (No. 319) followed by a HEPA filter.

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

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

#### D.14.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack IDs S-9, S-10, & S-11, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr, per stack, which is equivalent to 0.876 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.14.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-9, S-10, & S-11, as specifically listed in 326 IAC 15-1-2(a)(7) shall be limited to 0.04 lbs/hr, per stack, which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.14.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### **Compliance Determination Requirements**

#### D.14.4 Particulate Matter less than 10 microns in diameter (PM10)

- (a) In order to comply with Condition D.14.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.14.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

- (a) In order to comply with Condition 14.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.14.6 Visible Emissions Notations

- (a) Visible emission notations of the Stack IDs S-9, S-10, & S-11 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.14.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack IDs S-9, S-10, & S-11, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading,

the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-9)

Bin Vent Filter No. 317: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

(Stack ID S-10)

Bin Vent Filter No. 318: 0.1 – 5 inches of water  
HEPA: 0.1 – 10 inches of water

(Stack ID S-11)

Bin Vent Filter No. 319: 0.1 – 10 inches of water  
HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.14.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.14.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.14.6, the Permittee shall maintain records of visible emission notations of the Stack IDs S-9, S-10, & S-11 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.14.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).

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

## SECTION D.15 FACILITY OPERATION CONDITIONS TRIVIAL ACTIVITY

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

#### Stack ID S-13: Material Handling System

Material is pneumatically conveyed from the dump station to one of three hoppers.

Emissions units associated with Stack ID S-13 were installed in November, 1981.  
Emissions from this system are controlled by bin vent filters (No. 653, 654, & 655) and a HEPA filter.

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

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

#### D.15.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-13, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.15.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-13, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.15.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.15.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.15.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.15.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.15.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.15.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-13 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.15.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-13, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-13)

Bin Vent Filter No. 653: 0.1 – 5 inches of water

Bin Vent Filter No. 654: 0.1 – 5 inches of water

Bin Vent Filter No. 655: 0.1 – 10 inches of water

HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.15.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### D.15.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.15.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-13 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.15.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.16 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### Stack ID S-16: Blended Product Handling System

Blended product is pneumatically conveyed from the blender to one of three hoppers to await packaging.

Emissions units associated with Stack ID S-16 were installed in November, 1981.  
Emissions from this system are controlled by bin vent filters (No. 650, 651, & 652) and a HEPA filter.

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

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

#### D.16.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack ID S-16, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.200 lbs/hr which is equivalent to 0.876 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1, and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.16.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack ID S-16, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.04 lbs/hr which is equivalent to 0.18 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2, and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.16.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.16.4 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

- (a) In order to comply with Condition D.16.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

#### D.16.5 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

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- (a) In order to comply with Condition D.16.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.16.6 Visible Emissions Notations

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- (a) Visible emission notations of the Stack ID S-16 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

#### D.16.7 Parametric Monitoring

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The Permittee shall record the pressure drop across the baghouse and HEPA filter used in conjunction with the process associated with Stack ID S-16, at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse or HEPA filter is outside the normal range of the following:

(Stack ID S-16)

Bin Vent Filter No. 650: 0.1 – 10 inches of water

Bin Vent Filter No. 651: 0.1 – 10 inches of water

Bin Vent Filter No. 652: 0.1 – 10 inches of water

HEPA: 0.1 – 10 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. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with 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.16.8 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse 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 Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.16.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.16.6, the Permittee shall maintain records of visible emission notations of the Stack ID S-16 stack exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) To document the compliance status with Condition D.16.7, the Permittee shall maintain records of the pressure drop daily. 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 plant did not operate that day).
- (c) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.17 FACILITY OPERATION CONDITIONS - TRIVIAL ACTIVITY

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

#### Stack ID S-20: Central Vacuum System/No. 1 Dryer Vacuum System

The Central Vacuum System is used for general housekeeping throughout the plant.

Emissions units associated with Stack ID S-20 were installed in November, 1981.  
Emissions from this system are controlled by a bag filter (No. 447).

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

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

#### D.17.1 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>) FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, the PM<sub>10</sub> emissions from Stack ID S-20 shall be limited to 0.029 lb/hr which is equivalent to 0.127 tons/yr.

Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.1, D.7.1, D.8.1, D.9.2, D.10.1, D.12.1, D.13.1, D.14.1, D.15.1 and D.16.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.17.2 Lead (Pb) [326 IAC 15-1-2] FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4, Pb emissions from Stack S-20 shall be limited to 0.024 lbs/hr which is equivalent to 0.105 tons/yr.

Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.2, D.12.2, D.13.2, D.14.2, D.15.2 and D.16.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.

#### D.17.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.17.4 Visible Emissions Notations

- (a) Visible emission notations of the Stack ID S-20 exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps shall be considered a deviation from this permit.

**Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.17.5 Record Keeping Requirements**

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- (a) To document the compliance status with Condition D.17.5, the Permittee shall maintain records of visible emission notations of the Stack ID S-20 exhaust at least once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the plant did not operate that day).
- (b) Section C – General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

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

Source Name: Halstab Division of Hammond Group, Inc.  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
FESOP No.: F089-14167-00218

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Halstab Division of Hammond Group, Inc.  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
FESOP No.: F089-14167-00218

**This form consists of 2 pages**

**Page 1 of 2**

<p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• 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 IDEM Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865, IDEM), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
--

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Halstab Division of Hammond Group, Inc.  
Source Address: 3100 Michigan Street, Hammond, Indiana 46323  
FESOP No.: F089-14167-00218

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

**Page 1 of 2**

This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. 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:**

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

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit (FESOP)

<b>Source Description and Location</b>
--

Source Name:	Halstab Division of Hammond Group, Inc.
Source Location:	3100 Michigan St, Hammond, Lake County
SIC Code:	2819
Operation Permit No.:	F 089-14167-00218
Operation Permit Issuance Date:	June 16, 2005
Significant Permit Revision No.:	089-32648-00218
Permit Reviewer:	James Mackenzie

On December 19, 2012, the Office of Air Quality (OAQ) received an application from Halstab Division of Hammond Group, Inc. related to a modification to an existing stationary Industrial Inorganic and Organic Chemicals Manufacturing Plant.

<b>Existing Approvals</b>
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The source was issued FESOP F095-14167-00128 on June 16, 2005. The source has since received the following approvals:

- (a) Administrative Amendment No. 089-22698-00218, issued on March 15, 2006;
- (b) Minor Permit Revision No. 089-23378-00218, issued on December 7, 2006;
- (c) Administrative Amendment No. 089-25805-00218, issued on January 25, 2008;
- (d) Administrative Amendment No. 089-28378-00218, issued on October 5, 2009;
- (e) Administrative Amendment No. 089-29118-00218, issued on April 29, 2010;
- (f) Administrative Amendment No. 089-31429-00218, issued on February 2, 2012;

**County Attainment Status**

The source is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 <sup>th</sup> Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O <sub>3</sub>	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard.
PM <sub>10</sub>	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Unclassifiable or attainment effective February 6, 2012, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. 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 designation. 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. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
  
- (b) **PM<sub>2.5</sub>**  
 Lake County has been classified as attainment for PM<sub>2.5</sub>. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM<sub>2.5</sub> emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM<sub>2.5</sub> significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
  
- (c) **Other Criteria Pollutants**  
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

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, however, there is an applicable New Source Performance Standard that was in effect on August 7, 1980, therefore fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

**Description of Proposed Revision**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Halstab Division of Hammond Group, Inc. on December 17, 2012 relating to the revision of the lead (Pb) testing requirement conditions for Stack ID numbers S-12, S-15 and S-17. These stacks serve the Material Dump Station (S-12) and Blender (S-15). and Bulk/Bag Packaging System (S-17-1), Mixed Metal System (S-17-2) and the Two (2) Portable Packaging Stations (S-17-3).

Due to lack of production demand, those emission units that handle lead-bearing product [(S-12), (S-15), (S-17-1) and (S-17-3)] are not currently in operation. Testing for PM<sub>10</sub> and Lead emission will not be an active requirement until the commencement of operation for those units handling lead product.

The Mixed Metal System (S-17-2) does not handle lead product, and is expected to continue regular operation.

**Enforcement Issues**

There are no pending enforcement actions related to this revision.

**Emission Calculations**

There is no modification. No calculation is indicated.

**Permit Level Determination – FESOP Revision**

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHGs as CO <sub>2</sub> e	Total HAPs	Worst Single HAP
Total PTE of Proposed Revision	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

The proposed revision does not have any potential to emit; however, pursuant to 326 IAC 2-8-11.1(f), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision requires removal (and subsequent re-establishment) of a testing requirement.

**PTE of the Entire Source After Issuance of the FESOP Revision**

The table below summarizes the potential to emit of the entire source. No changes to any potentials has been effected.

	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO <sub>2</sub>	NOx	VOC	CO	GHGs as CO <sub>2</sub> e**	Total HAPs	Worst Single HAP
Total PTE of Entire Source	<100	<100	<100	<100	<100	<100	<100	<100,000	<25	<10
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	100	100	100	100	100	NA	100	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". **The 100,000 CO <sub>2</sub> e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.										

- (a) **FESOP Status**  
 This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).
- (b) **PSD Minor Source**  
 This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) **Emission Offset Minor Source**  
 This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

**Federal Rule Applicability Determination**

- (a) New Source Performance Standards (NSPS)  
 No NSPS is included for this proposed revision.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAP)  
 No NESHAP is included for this proposed revision.

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

**State Rule Applicability Determination**

No state rules are applicable to this source or any of the facilities therein as a result of this modification.

**Compliance Determination Requirements, Compliance Monitoring Requirements**

- (a) Compliance determination requirements applicable as a result of this proposed revision include the following testing requirements:

Testing Requirements				
Emission Unit, ID	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Material Dump Station, S-12	Bag Filter #506 & HEPA unit	Pb	180 days of Pb product introduction	5 years from valid demonstration
Blender, S-15	Bag Filter #301 & HEPA unit			
Bulk/pkg. System, S-17-1	Bag Filter #430 & HEPA unit			
(2) Portable pkg. Sta., S-17-3				

The source currently does not use lead product at these units. They are not currently operated, and the next occasion of their use is unknown. However, if the use of lead product in these emission units resumes, testing for lead emissions is required.

Scheduling for future testing is dependent upon the date of re-introduction of lead product in these units. Consequently, notification to the Compliance and Enforcement Branch is expected upon the re-introduction of lead product to these units.

- (b) There are no compliance monitoring requirements applicable as a result of this proposed revision.

**Proposed Changes**

The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

**Change 1:** The Material Dump Station (S-12), the Blender (S-15), the Bulk/Bag Packaging System (S-17-1) and the Two (2) Portable Packing Stations (S-17-3) have been idled due to lack of demand for the lead-bearing product mix. If and when production of the lead-bearing product is re-introduced, Pb emission testing at the corresponding stacks will be required in order to determine compliance through the use of the bag filters and HEPA units. The permit is revised as follows:

D.2.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

~~During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform Pb testing on Stack ID S-12 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.~~

**In order to demonstrate compliance with Condition D.2.2, not later than 180 days after the introduction of lead product to the Material Dump Station, the Permittee shall perform Pb testing on Stack ID S-12 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

... ..

D.4.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

~~During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform Pb testing on Stack ID S-15 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.~~

**In order to demonstrate compliance with Condition D.4.2, not later than 180 days after the introduction of lead product to the Blender, the Permittee shall perform Pb testing on Stack ID S-15 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

... ..

D.5.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

~~During the period between 30 and 36 months after issuance of this FESOP, in order to demonstrate compliance with Condition D.5.2, the Permittee shall perform Pb testing on Stack S-17 utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~

**In order to demonstrate compliance with Condition D.5.2, not later than 180 days after the introduction of lead product to the Bulk/Bag Packaging System and/or the Two (2) Portable Packing Stations, the Permittee shall perform Pb testing on Stack ID S-17 utilizing methods as approved by the Commissioner. Thereafter, this test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.**

... ..

**Change 2:** Upon review of the FESOP limits in place for this source, IDEM has decided to clarify the relationship among the FESOP limits in multiple D sections, and their relevance to 326 IAC 2-7 applicability. The permit is revised similarly in Sections D.1 through D.4, Sections D.7, D.8, D.10, and Sections D.13 through D.16, as follows:

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

D.1.1 Lake County: PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2-14],  
**FESOP Limit** [326 IAC 2-8-4]

---

Pursuant to 326 IAC 6.8-2-14 (Lake County: PM<sub>10</sub> emission requirements), the PM<sub>10</sub> emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 6.8-2-14(a), shall be limited to 0.022 gr/dscf and 0.570 lbs/hr, per stack, which is equivalent to 2.497 tons/yr. ~~This requirement will ensure that the source total PM<sub>10</sub> emissions stay below 100 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

**Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.2, D.7.1, D.8.1, D.9.1, D.10.2, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.**

D.1.2 Lead (Pb) [326 IAC 15-1-2] **FESOP Limit** [326 IAC 2-8-4]

---

Pursuant to 326 IAC 15 (Lead Emission Limitations), the Pb emissions from Stack IDs S-6, S-7, & S-8, as specifically listed in 326 IAC 15-1-2(a)(7), shall be limited to 0.05 lbs/hr, per stack, which is equivalent to 0.22 tons/yr. ~~This requirement will ensure that the source total Pb emissions stay below 10 tons/yr. Therefore, the requirements of 326 IAC 2-7 do not apply.~~

**Compliance with the above condition and Conditions D.1.2, D.2.2, D.3.2, D.4.2, D.5.2, D.7.2, D.8.2, D.10.3, D.12.2, D.13.2, D.14.2, D.15.2, D.16.2 and D.17.2, combined with the potential to emit Pb from other emission units at the source, will limit Pb emissions from the entire source to less than 10 tons per year and will render 326 IAC 2-7 not applicable to the source.**

**Change 3:** Upon further review of the Compliance Determination Requirements, IDEM has decided to clarify the requirements for the Permittee with respect to actions required in the event of a baghouse failure. The permit is revised similarly in Sections D.1 through D.4, Sections D.7, D.8, D.10, and Sections D.13 through D.16, as follows:

Compliance Determination Requirements

D.1.5 Particulate Matter less than 10 microns in diameter (PM<sub>10</sub>)

---

- (a) In order to comply with Condition D.1.1, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. ~~Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total PM<sub>10</sub> emissions stay below 100 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.~~
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.1.6 Lead (Pb) [326 IAC 15-1-2(a)(7)(A)]

- (a) In order to comply with Condition D.1.2, the baghouse and HEPA system shall be operated at all times when the associated facility is in operation. ~~Operation of the air pollution control equipment according to the compliance monitoring requirements of this permit will ensure that the source total Pb emissions stay below 10 tons per year. Therefore, the Part 70 (326 IAC 2-7) requirements do not apply.~~
- (b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

... ..

**Change 4:** Upon review of the FESOP limits in place for PM<sub>10</sub> this source, IDEM has decided to revise the PM<sub>10</sub> limit due to the applicability of 326 IAC 6.8-1-2 because Boilers 1 and 2 are gaseous fuel-fired steam generators in Lake County. This section governs PM; however, all particulate emissions from natural gas combustion are presumed to be less than 1.0 micron. Therefore, this limit may effectively serve as part of the multipart FESOP Limit for PM<sub>10</sub> for this source. The permit is revised as follows:

D.9.1 Particulate Matter less than 10 microns in diameter (PM10) [326 IAC 2-8-4]  
Particulate Matter (PM) Limitation [326 IAC 6.8-1-2] and  
(PM<sub>10</sub>) FESOP Limit [326 IAC 2-8-4]

~~Pursuant to 326 IAC 2-8-4, the PM10 emissions for Stack IDs S-18 and S-19 shall be limited to 0.003 lbs/MMBtu and 0.008 lb/hr, per stack.~~

**Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emission from either Stack S-18 or Stack S-19 shall not exceed 0.01 grains per dry standard cubic foot (dsfc).**

**Compliance with the above condition and Conditions D.2.1, D.3.1, D.4.1, D.5.1, D.6.2, D.7.1, D.8.1, D.10.2, D.12.1, D.13.1, D.14.1, D.15.1, D.16.1 and D.17.1, combined with the potential to emit PM<sub>10</sub> from other emission units at the source, will limit PM<sub>10</sub> emissions from the entire source to less than 100 tons per year and will render 326 IAC 2-7 not applicable to the source.**

**Change 5:** Particulate Matter (PM) limits were previously established for stacks S-3, S-20 and S-21 under provisions of local ordinance Hammond Air Quality Control Ordinance No. 3522, when the local agency, Hammond Department of Environmental Management - Air Pollution Control Division, served as the administrator of the air permit. Since this ordinance is not approved through a State Implementation Plan, it is not enforceable in a stated administered permit. Three conditions are removed from the permit as follows:

D.6.1 Particulate Matter (PM) [326 IAC 6.8] [326 IAC 2-8-4]

~~Pursuant to 326 IAC 6.8 and 326 IAC 2-8-4, the PM emissions from Stack ID S-3 shall be limited to 1.000 lb/hr which is equivalent to 4.380 tons/yr.~~

... ..

D.10.1 Particulate Matter (PM) [326 IAC 6.8] FESOP Limit [326 IAC 2-8-4]

~~Pursuant to 326 IAC 6.8 and 326 IAC 2-8-4, the PM emissions from Stack ID S-21 shall be limited to 2.497 lbs/hr which is equivalent to 10.935 tons/yr.~~

... ..

~~D.17.1 Particulate Matter (PM) [326 IAC 6.8] [326 IAC 2-8-4]~~

~~Pursuant to 326 IAC 6.8 and 326 IAC 2-8-4, the PM emissions from Stack ID S-20 shall be limited to 0.029 lb/hr, which is equivalent to 0.127 tons/yr.~~

... ..

<b>Conclusion and Recommendation</b>
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Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 17, 2012.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 089-32648-00218. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to James Mackenzie at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-2641 or toll free at 1-800-451-6027 extension 3-2641.
- (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.in.gov/idem](http://www.in.gov/idem)

Appendix A: Emission Calculations  
 Company Name: Halstab Division of Hammond Group, Inc.  
 Address: 3100 Michigan St., Hammond IN, 46323  
 Part 70 Permit: T089-32648-00218  
 Reviewer: James Mackenzie  
 Date: 2/05/13

### SUMMARY

Potential To Emit (tpy):	(ton / yr)							
	PM/ PM <sub>10</sub> /PM <sub>2.5</sub>	-	Pb	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	GHG's (CO <sub>2</sub> e)
<b>Total Source PTE *</b>	<b>103.3</b>	<b>-</b>	<b>79.9</b>	<b>0.04</b>	<b>6.8</b>	<b>0.4</b>	<b>2.8</b>	<b>&lt;100 k</b>

\* Totals reflect results reported in 1<sup>st</sup> renewal FESOP F089-14167-00218 + Minor Permit Revision 089-23378-00218.

### Limited Emissions (tpy):

Emission Units	PM/ PM <sub>10</sub> /PM <sub>2.5</sub> (lb/hr)	PM/ PM <sub>10</sub> /PM <sub>2.5</sub> (ton/yr)	Pb (lb/hr)	Pb (ton/yr)
Stack S-6, Mill Line #1	0.570	2.50	0.05	0.22
Stack S-7, Mill Line #2	0.570	2.50	0.05	0.22
Stack S-8, Mill Line #3	0.570	2.50	0.05	0.22
Stack S-12, Mat. Dump Station	0.200	0.88	0.04	0.18
Stack S-14, Blend Scale Hopper	0.200	0.88	0.04	0.18
Stack S-15, Blender	0.200	0.88	0.04	0.18
Stack S-17, Package/Mix/Pack	1.990	8.72	0.07	0.31
<b>Insignificant Activities</b>				
Stack S-3, Acid Dispersion System	1.000	4.380	-	-
Stack S-4, #1 Dryer	1.460	6.39	0.07	0.31
Stack S-5, #1 Dryer Containment System	1.030	4.51	0.07	0.31
Stack S-18, #1 Boiler	0.043 PM	0.188 PM	0.171 PM10	0.751 PM10
Stack S-19, #2 Boiler	0.043 PM	0.188 PM	0.171 PM10	0.751 PM10
Stack S-21, #3 Dryer	2.497	10.937	0.07	0.31
<b>Trivial Activities</b>				
Stack S-1, Feedstock Hndlg. Sys.	0.220	0.96	0.04	0.18
Stack S-2, Dispersion Sys.	0.080	0.35	0.04	0.18
Stack S-9, #1 Prod. Hndlg. Sys.	0.200	0.88	0.04	0.18
Stack S-10, #2 Prod. Hndlg. Sys.	0.200	0.88	0.04	0.18
Stack S-11, #3 Prod. Hndlg. Sys.	0.200	0.88	0.04	0.18
Stack S-13, #1 Mat. Hndlg. Sys.	0.200	0.88	0.04	0.18
Stack S-16, Blended Prod. Hndlg. Sys.	0.200	0.88	0.04	0.18
Stack S-20, Central Vac. Sys. / #1 Dryer Vac.	0.029	0.127	0.024	0.11
<b>Total PTE ***</b>	<b>-</b>	<b>52.4</b>	<b>-</b>	<b>3.6</b>

Boilers 1 & 2; PM10 = Limited PM [326 IAC 6.8-1-2]=

$$(0.01)(\text{gr./dscf})(1/7000)(\text{lb/gr}) \times (2.5)(\text{mmBtu/hr}) \times (200)(\text{cfm-hr/mmBtu}) \times (60)(\text{min/hr}) = 0.043 \text{ lb/hr PM}$$

( Natural Gas exhaust flow approximated at [200 cfm]/[mmBtu/hr] )

PM<sub>10</sub> includes condensable and filterable matter

Per AP42 Table 1.4-2 (7/98), PM<sub>10</sub> is expected to be greater than PM by a factor of [7.6/1.9] = 0.171 lb/hr PM<sub>10</sub>

Boiler 1 & 2 PM<sub>10</sub> included in total.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** Jean Ziga  
Halstab Division of Hammond Group, Inc.  
2323 165th Street  
Hammond, IN 46320

**DATE:** April 9, 2013

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

**SUBJECT:** Final Decision  
First Significant Revision to FESOP  
089-32648-00218

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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April 9, 2013

TO: Hammond Public Library

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

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

**Applicant Name: Halstab Division of Hammond Group, Inc.**  
**Permit Number: 089-32648-00218**

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	PWAY 4/9/2013 Halstab Division Of Hammond Group, Inc. 32648 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Jean Ziga Halstab Division Of Hammond Group, Inc. 2323 165th St Hammond IN 46320 (Source CAATS)										
2		Matt Mikus Post Tribune 1433 E 83rd Avenue Merrillville IN 46410 (Affected Party)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
7		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
8		Hammond Public Library 564 State St Hammond IN 46320-1532 (Library)										
9		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
10		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
11		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
12		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
13		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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# Mail Code 61-53

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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		Robert 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
2		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
3		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)									
4		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
5		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)									
6		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)									
7		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)									
8		)									
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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