



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Michael R. Pence**  
Governor

**Thomas W. Easterly**  
Commissioner

To: Interested Parties

Date: October 3, 2014

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

Source Name: Valbruna Slater Stainless, Inc.

Permit Level: Administrative Amendment

Permit Number: 003-34799-00011

Source Location: 2400 Taylor Street West, Fort Wayne, Indiana

Type of Action Taken: Changes that are administrative in nature

## Notice of Decision: Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>  
To view the document, select Search option 3, then enter permit 34799.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201  
100 North Senate Avenue, MC 50-07  
Indianapolis, IN 46204  
Phone: 1-800-451-6027 (ext. 4-0965)  
Fax (317) 232-8659

*(continues on next page)*

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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.



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Commissioner

Mr. Jonathan Hacker  
Valbruna Slater Stainless, Inc.  
2400 Taylor Street West  
Fort Wayne, Indiana 46802

October 3, 2014

Re: 003-34799-00011  
Administrative Amendment to  
F003-23815-00011

Dear Mr. Hacker:

Valbruna Slater Stainless, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F003-23815-00011 on September 6, 2007 for a stationary stainless steel products processing plant located at 2400 Taylor Street West, Fort Wayne, Indiana 46802. On August 4, 2014, the Office of Air Quality (OAQ) received an application from the source requesting to add an insignificant activity and remove an emissions unit.

Pursuant to the provisions of 326 IAC 2-7-11(a), the permit is hereby administratively amended as described in the attached Technical Support Document.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire Part 70 Operating Permit as modified.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

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 Doug Logan of my staff at 317-234-5328 or 1-800-451-6027, and ask for extension 4-5328.

Sincerely,

Jenny Acker, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Updated Permit

JA/dl

cc: File - Allen County  
Allen County Health Department  
U.S. EPA, Region V  
Compliance and Enforcement Branch



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Commissioner

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

**Valbruna Slater Stainless, Inc  
2400 Taylor Street West  
Fort Wayne, Indiana 46802**

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

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

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

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

Operation Permit No.: F003-23815-00011	
Original Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: September 6, 2007  Expiration Date: September 6, 2017
Administrative Amendment No.: 003-25324-00011, issued on December 21, 2007 Administrative Amendment No.: 003-26526-00011, issued on June 18, 2008 Significant Permit Revision Greenhouse Gas Reopening No.: 003-31404-00011, issued May 27, 2012 Administrative Amendment No.: 003-34799-00011	
Issued by:  Jenny Acker, Section Chief Permits Branch Office of Air Quality	Issuance Date: October 3, 2014  Expiration Date: September 6, 2017



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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 stainless steel products processing plant.

Source Address:	2400 Taylor Street West, Fort Wayne, Indiana 46802
General Source Phone Number:	260-434-2955
SIC Code:	3312
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rule Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

#### (a) Primary Mill

- (1) One (1) ingot grinding operation (ID# B1), constructed in 1988, with a maximum capacity of 10.27 tons per hour, controlled by a voluntary dust collection house ID# E4, and exhausting through vent E4;
- (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each, emissions uncontrolled and exhausting inside the building; and
- (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour, with a maximum heat input capacity of 13.0 million Btu per hour, each, emission uncontrolled and exhausting inside the building.

#### (b) Continuous Bar Mill and Annealing

- (1) One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled, and exhausting inside the building.

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

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This stationary source also includes the following insignificant activities, as defined in [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(1)]:

#### (a) Billet Conditioning

- (1) One (1) dry grinding operation (ID# C3), constructed in 1989, with a maximum capacity of 1.6 tons per hour, emissions uncontrolled and exhausting through vent E6; and

- (2) One (1) CMI grinder (ID# C5), constructed in 1985, with a maximum capacity of 1.60 tons per hour, voluntarily controlled by a voluntary baghouse (ID# E8a), and exhausting inside the building.
- (b) Continuous Bar Mill and Annealing
- (1) One (1) CBM cut-off saw (ID# D2), constructed in 1990, with a maximum processing capacity of 5.14 tons of bars per hour, controlled by a voluntary baghouse (ID# E10), and exhausting through stack E10;
- (c) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];
- (d) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4];
- (e) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4];
- (f) Seven (7) natural gas-fired heat treat furnaces with a maximum heat input capacity of 9.72 million Btu per hour, each;
- (g) One (1) natural gas-fired heat treat furnace with a maximum heat input capacity of 7.00 million Btu per hour;
- (h) Continuous Draw Cell Line
- (1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation;
  - (2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching;
  - (3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC;
  - (4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and
  - (5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].
- (i) Vacuum Arc Remelting
- (1) One (1) MIG Welding Station (ID# MWS), approved for construction in 2007, with a maximum capacity of four (4) welds and four (4) cuts per 24 hours, controlled by a baghouse (ID# MWS-1), and exhausting inside the building;
  - (2) Two (2) Vacuum Arc Remelting furnaces (ID# VAR1 & VAR2), approved for construction in 2007, each with a heat input capacity of 1680 Kilo Volt Amperes

- (kVA), each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, each controlled by a 50 horsepower (HP) vacuum mist eliminator (ID# VAR1-V & VAR2-V), and exhausting inside the building;
- (3) Two (2) natural gas-fired Hot Boxes (ID# HB1 & HB2), approved for construction in 2007, each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, with a maximum heat input capacity of 0.4 million British thermal units per hour, with emissions uncontrolled and exhausting inside the building; and
- (4) One (1) Crucible Cleaning Station (ID# CCS) constructed in 2007, with a maximum capacity of four (4) crucibles per 24 hours, controlled by a baghouse (ID# CCS-1), and exhausting inside the building.
- (j) Electro slag remelt operation, identified as ESR;
- (k) Combustion source flame safety purging start up;
- (l) One (1) gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (m) One (1) petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (n) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (o) Refractory storage not requiring air pollution control equipment;
- (p) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (q) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (r) Cleaners and solvents characterized as follows:
- (1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 C (100 F); or
- (2) having a vapor pressure equal to or less than 0.7 kilopascal; 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;
- (s) Closed loop heating and cooling systems;
- (t) Forced and induced draft noncontact cooling tower system not regulated under a NESHAP;
- (u) Quenching operations used with heat treating processes;
- (v) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (w) Heat exchanger cleaning and repair;

- (x) Process vessel degassing and cleaning to prepare for internal repairs;
- (y) Paved roads and parking lots with public access;
- (z) Equipment used to collect any material that might be released during a malfunction, process upset, or spill clean up, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (aa) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (bb) Furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;
- (cc) A laboratory as defined in 326 IAC 2-7-1(21)(D);
- (dd) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of:
  - (1) Two (2) cold cleaner degreasers without remote solvent reservoirs, constructed after January 1, 1980 and before July 1, 1990. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]
  - (2) Five (5) cold cleaner degreasers with remote solvent reservoirs, constructed after January 1, 1980. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]
- (ee) Noncontact cooling towers used with chiller systems (no chromates);
- (ff) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2];
- (gg) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (hh) One (1) dry belt polisher, approved for construction in 2008, with a maximum capacity of 2.64 tons of steel bar per hour, controlled by a dust collector, and exhausting inside the building.

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).

## **SECTION B GENERAL CONDITIONS**

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

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

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

- (a) This permit, F003-23815-00011, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

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

- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

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

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

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and

repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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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 describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable

requirement.

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

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

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

- (a) All terms and conditions of permits established prior to F003-23815-00011 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

Request for renewal shall be submitted to:

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

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

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

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

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

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

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

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

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available,

upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(b)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(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 Requirement [326 IAC 2-8-11.1]

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

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

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

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

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

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

responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

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

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

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

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

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

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

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.3 Opacity [326 IAC 5-1]

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

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

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

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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.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

**C.6 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.7 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.8 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 that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

#### **C.9 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. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.10 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.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]**

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- (a) For new units:  
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:  
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 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, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

#### **C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

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

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

#### **C.13 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.14 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; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

**C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
  - (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, where applicable:
  - (AA) The date, place, as defined in 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 within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

**C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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 not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

**C.18 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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Primary Mill
  - (1) One (1) ingot grinding operation (ID# B1), constructed in 1988, with a maximum capacity of 10.27 tons per hour, controlled by a voluntary dust collection house ID# E4, and exhausting through vent E4;
  - (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each, emissions uncontrolled and exhausting inside the building; and
  - (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour, with a maximum heat input capacity of 13.0 million Btu per hour, each, emissions uncontrolled and exhausting inside the building.
- (b) Continuous Bar Mill and Annealing
  - (1) One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled, and exhausting inside the building.

### Insignificant Activities

- (c) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];
- (d) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4];
- (e) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4];
- (f) Seven (7) natural gas-fired heat treat furnaces with a maximum heat input capacity of 9.72 million Btu per hour, each;
- (i) Vacuum Arc Remelting
  - (3) Two (2) natural gas-fired Hot Boxes (ID# HB1 & HB2), constructed in 2007, each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, with a maximum heat input capacity of 0.4 million British thermal units per hour, with emissions uncontrolled and exhausting inside the building.

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

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

#### D.1.1 Particulate Emissions Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (e), (Particulate Emissions Limitations for Manufacturing Processes),

the allowable particulate matter (PM) emissions from the Ingot grinding shall not exceed 19.53 pounds per hour emission rate established by the equation:

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

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

Where:

P = process weight rate in tons per hour (10.27 tons/hour); and  
E = rate of emission in pounds per hour.

#### D.1.2 FESOP [326 IAC 2-8-4] [326 IAC 2-2]

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Pursuant to 326 IAC 2-8-4 (FESOP), and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable:

- (a) The natural gas usage of the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace, three (3) boilers, seven (7) heat treat furnaces, and two (2) hot boxes shall be less than 1,500 million cubic feet of natural gas per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (i) The nitrogen oxides (NO<sub>x</sub>) emissions from natural gas combustion shall not exceed 100 pounds per million cubic feet (lb/MMcf).
  - (ii) The carbon monoxide (CO) emissions from natural gas combustion shall not exceed 84 pounds per million cubic feet (lb/MMcf).

Compliance with the above limits, combined with the potential to emit NO<sub>x</sub> and CO from all other emission units, shall limit emissions from the entire source to less than 100 tons each of NO<sub>x</sub>, and CO per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

#### D.1.3 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established in Conditions D.1.2.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual natural gas usage each month; and
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

#### D.1.4 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report 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).

**SECTION D.2**

**RESERVED**

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

#### Insignificant Activities

- (dd) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of:
- (1) Two (2) cold cleaner degreasers without remote solvent reservoirs, constructed after January 1, 1980 and before July 1, 1990. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]
  - (2) Five (5) cold cleaner degreasers with remote solvent reservoirs, constructed after January 1, 1980. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]

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

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

#### D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
  - (1) Equip the degreaser with a cover.
  - (2) Equip the degreaser with a device for draining cleaned parts.
  - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
  - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
  - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
  - (6) Store waste solvent only in covered containers.
  - (7) Prohibit the dispose or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

#### D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

#### D.3.3 Record Keeping Requirements

- (a) To document the compliance status with Condition D.3.2, on and after January 1, 2015,

the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (1) The name and address of the solvent supplier.
  - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
  - (3) The type of solvent purchased.
  - (4) The total volume of the solvent purchased
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (a) One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];
- (b) One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4]; and
- (c) One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4].

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

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

#### D.4.1 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), particulate matter (PM) emissions from Boiler #2 shall not exceed 0.6 pounds of PM per million British thermal units.

#### D.4.2 Particulate Matter (Particulate Emission Limitations for Sources of Indirect Heating) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, particulate matter (PM) emissions from the Boiler #3 and the CDC Boiler shall not exceed 0.58 and 0.49 pounds of PM per million British thermal units, respectively.

The limits were calculated using the equation below:

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

Where:

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

Q = Total source maximum operating capacity (MMBtu/hr) = 11.35 MMBtu/hr for boiler # 3 and 21.35 MMBtu/hr for CDC boiler.

#### D.4.3 General Provision Relating to New Source Performance Standards [326 IAC 12-1] [40 CFR 60, Subpart A]

- (a) Pursuant to 40 CFR 60.1, the Permittee shall comply with the provisions of 40 CFR Part 60 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1 for the CDC Boiler except as otherwise specified in 40 CFR Part 60, Subpart Dc.
- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports to:  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue,  
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

D.4.4 Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units  
[326 IAC 12-1] [40 CFR 60, Subpart Dc]

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Pursuant to 40 CFR 60 Subpart Dc, the Permittee shall comply with the provisions of Standard of Performance for Small Industrial-Commercial Institutional Steam Generating Units for the CDC Boiler as specified as follows:

**§ 60.40c *Applicability and delegation of authority.***

- (a) Except as provided in paragraph (d) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).
- (b) In delegating implementation and enforcement authority to a State under section 111(c) of the Clean Air Act, §60.48c(a)(4) shall be retained by the Administrator and not transferred to a State.

Facility covered by an EPA approved State or Federal section 111(d)/129 plan implementing subpart BBBB of this part is not covered by this subpart.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 71 FR 9884, Feb. 27, 2006]

**§ 60.41c *Definitions.***

As used in this subpart, all terms not defined herein shall have the meaning given them in the Clean Air Act and in subpart A of this part.

*Annual capacity factor* means the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity. In the case of steam generating units that are rented or leased, the actual heat input shall be determined based on the combined heat input from all operations of the affected facility during a period of 12 consecutive calendar months.

*Coal* means all solid fuels classified as anthracite, bituminous, subbituminous, or lignite by the American Society of Testing and Materials in ASTM D388-77, 90, 91, 95, or 98a, Standard Specification for Classification of Coals by Rank (IBR—see §60.17), coal refuse, and petroleum coke. Coal-derived synthetic fuels derived from coal for the purposes of creating useful heat, including but not limited to solvent refined coal, gasified coal, coal-oil mixtures, and coal-water mixtures, are also included in this definition for the purposes of this subpart.

*Coal refuse* means any by-product of coal mining or coal cleaning operations with an ash content greater than 50 percent (by weight) and a heating value less than 13,900 kilojoules per kilogram (kJ/kg) (6,000 Btu per pound (Btu/lb) on a dry basis.

*Cogeneration steam generating unit* means a steam generating unit that simultaneously produces both electrical (or mechanical) and thermal energy from the same primary energy source.

*Combined cycle system* means a system in which a separate source (such as a stationary gas turbine, internal combustion engine, or kiln) provides exhaust gas to a steam generating unit.

*Combustion research* means the experimental firing of any fuel or combination of fuels in a steam generating unit for the purpose of conducting research and development of more efficient combustion or more effective prevention or control of air pollutant emissions from combustion, provided that, during these periods of research and development, the heat generated is not used for any purpose other than preheating combustion air for use by that steam generating unit (i.e., the heat generated is released to the atmosphere without being used for space heating, process heating, driving pumps, preheating combustion air for other units, generating electricity, or any other purpose).

*Conventional technology* means wet flue gas desulfurization technology, dry flue gas desulfurization technology, atmospheric fluidized bed combustion technology, and oil hydrodesulfurization technology.

*Distillate oil* means fuel oil that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, “Standard Specification for Fuel Oils” (incorporated by reference—see §60.17).

*Dry flue gas desulfurization technology* means a sulfur dioxide (SO<sub>2</sub>) control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a dry powder material. This definition includes devices where the dry powder material is subsequently converted to another form. Alkaline reagents used in dry flue gas desulfurization systems include, but are not limited to, lime and sodium compounds.

*Duct burner* means a device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

*Emerging technology* means any SO<sub>2</sub> control system that is not defined as a conventional technology under this section, and for which the owner or operator of the affected facility has received approval from the Administrator to operate as an emerging technology under §60.48c(a)(4).

*Federally enforceable* means all limitations and conditions that are enforceable by the Administrator, including the requirements of 40 CFR Parts 60 and 61, requirements within any applicable State implementation plan, and any permit requirements established under 40 CFR 52.21 or under 40 CFR 51.18 and 40 CFR 51.24.

*Fluidized bed combustion technology* means a device wherein fuel is distributed onto a bed (or series of beds) of limestone aggregate (or other sorbent materials) for combustion; and these materials are forced upward in the device by the flow of combustion air and the gaseous products of combustion. Fluidized bed combustion technology includes, but is not limited to, bubbling bed units and circulating bed units.

*Fuel pretreatment* means a process that removes a portion of the sulfur in a fuel before combustion of the fuel in a steam generating unit.

*Heat input* means heat derived from combustion of fuel in a steam generating unit and does not include the heat derived from preheated combustion air, recirculated flue gases, or exhaust gases from other sources (such as stationary gas turbines, internal combustion engines, and kilns).

*Heat transfer medium* means any material that is used to transfer heat from one point to another point.

*Maximum design heat input capacity* means the ability of a steam generating unit to combust a stated maximum amount of fuel (or combination of fuels) on a steady state basis as determined by the physical design and characteristics of the steam generating unit.

*Natural gas* means (1) a naturally occurring mixture of hydrocarbon and nonhydrocarbon gases found in geologic formations beneath the earth's surface, of which the principal constituent is methane, or (2) liquefied petroleum (LP) gas, as defined by the American Society for Testing and Materials in ASTM D1835–86, 87, 91, or 97, "Standard Specification for Liquefied Petroleum Gases" (incorporated by reference—see §60.17).

*Noncontinental area* means the State of Hawaii, the Virgin Islands, Guam, American Samoa, the Commonwealth of Puerto Rico, or the Northern Mariana Islands.

*Oil* means crude oil or petroleum, or a liquid fuel derived from crude oil or petroleum, including distillate oil and residual oil.

*Potential sulfur dioxide emission rate* means the theoretical SO<sub>2</sub> emissions (nanograms per joule [ng/J], or pounds per million Btu [lb/million Btu] heat input) that would result from combusting fuel in an uncleaned state and without using emission control systems.

*Process heater* means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.

*Residual oil* means crude oil, fuel oil that does not comply with the specifications under the definition of distillate oil, and all fuel oil numbers 4, 5, and 6, as defined by the American Society for Testing and Materials in ASTM D396–78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils" (incorporated by reference—see §60.17).

*Steam generating unit* means a device that combusts any fuel and produces steam or heats water or any other heat transfer medium. This term includes any duct burner that combusts fuel and is part of a combined cycle system. This term does not include process heaters as defined in this subpart.

*Steam generating unit operating day* means a 24-hour period between 12:00 midnight and the following midnight during which any fuel is combusted at any time in the steam generating unit. It is not necessary for fuel to be combusted continuously for the entire 24-hour period.

*Wet flue gas desulfurization technology* means an SO<sub>2</sub> control system that is located between the steam generating unit and the exhaust vent or stack, and that removes sulfur oxides from the combustion gases of the steam generating unit by contacting the combustion gases with an alkaline slurry or solution and forming a liquid material. This definition includes devices where the liquid material is subsequently converted to another form. Alkaline reagents used in wet flue gas desulfurization systems include, but are not limited to, lime, limestone, and sodium compounds.

*Wet scrubber system* means any emission control device that mixes an aqueous stream or slurry with the exhaust gases from a steam generating unit to control emissions of particulate matter (PM) or SO<sub>2</sub>.

*Wood* means wood, wood residue, bark, or any derivative fuel or residue thereof, in any form, including but not limited to sawdust, sanderdust, wood chips, scraps, slabs, millings, shavings, and processed pellets made from wood or other forest residues.

[55 FR 37683, Sept. 12, 1990, as amended at 61 FR 20736, May 8, 1996; 65 FR 61752, Oct. 17, 2000; 71 FR 9884, Feb. 27, 2006]

**§ 60.48c Reporting and recordkeeping requirements.**

- (a) The Permittee of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include:
  - (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (g) The permittee of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The Permittee of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.
- (i) All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.
- (j) The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.

[55 FR 37683, Sept. 12, 1990, as amended at 64 FR 7465, Feb. 12, 1999; 65 FR 61753, Oct. 17, 2000; 71 FR 9886, Feb. 27, 2006]

## SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Insignificant Activities

- (a) Billet Conditioning
  - (1) One (1) dry grinding operation (ID# C3), constructed in 1989, with a maximum capacity of 1.6 tons per hour, emissions uncontrolled and exhausting through vent E6; and
  - (2) One (1) CMI grinder (ID# C5), constructed in 1985, with a maximum capacity of 1.60 tons per hour, voluntarily controlled by a voluntary baghouse (ID# E8a), and exhausting inside the building.
- (b) Continuous Bar Mill and Annealing
  - (1) One (1) CBM cut-off saw (ID# D2), constructed in 1990, with a maximum processing capacity of 5.14 tons of bars per hour, controlled by a voluntary baghouse (ID# E10), and exhausting through stack E10;
- (c) Continuous Draw Cell Line
  - (1) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and
  - (2) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].
- (d) Vacuum Arc Remelting
  - (1) Two (2) Vacuum Arc Remelting furnaces (ID# VAR1 & VAR2), approved for construction in 2007, each with a heat input capacity of 1680 Kilo Volt Amperes (kVA), each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, each controlled by a 50 horsepower (HP) vacuum mist eliminator (ID# VAR1-V & VAR2-V), and exhausting inside the building
  - (2) Two (2) natural gas-fired Hot Boxes (ID# HB1 & HB2), approved for construction in 2007, each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, with a maximum heat input capacity of 0.4 million British thermal units per hour, with emissions uncontrolled and exhausting inside the building;
- (e) One (1) dry belt polisher, approved for construction in 2008, with a maximum capacity of 2.64 tons of steel bar per hour, controlled by a dust collector, and exhausting inside the building.

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

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

#### D.5.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emission Limitations for Manufacturing Processes), the particulate matter (PM) emissions from the sawing operation and oxidizing operation shall not exceed the pounds per hour emission rate established by the equation:

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

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

Where:

P = process weight in tons/hr and  
E = rate of emission in pounds per hour.

#### D.5.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the dry grinding operation, CMI grinder, CBM cut-off saw, the vacuum arc remelting furnaces (VAR1 & VAR2), the hot boxes (HB1 & HB2), and the dry belt polisher shall not exceed the emission limits shown in the table below:

Operation	P (tons/hr)	Allowable Limits (lbs/hr)
Dry grinding	1.6	5.6
CMI grinder	1.6	5.6
CBM cut-off saw	5.14	12.3
VAR1 & VAR2	0.83	3.63
HB1 & HB2	0.83	3.63
Dry Belt Polisher	2.64	7.86

The pounds per hour limitations were calculated with the following equation:

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

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

Where:

P = process weight in tons/hr; and  
E = rate of emission in pounds per hour.

### Compliance Determination Requirements

#### D.5.3 Particulate Matter (PM)

In order to comply with Conditions D.5.1 and D.5.2, the baghouse for PM control shall be in operation and control emissions from the CMI grinder, CBM cut-off saw, and sawing operation at all times that the CMI grinder, CBM cut-off saw, and sawing operation are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
FESOP Permit No.: F003-23815-00011

**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 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: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
FESOP Permit No.: F003-23815-00011

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <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 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), 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 DATA SECTION**

**FESOP Quarterly Report**

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
FESOP Permit No.: F003-23815-00011  
Facility: Sourcewide  
Parameter: Annual Natural Gas Usage  
Limits: Less than 1500 million cubic feet (MMCF) per twelve consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Natural Gas Usage This Month (MMCF)	Natural Gas Usage Previous 11 Months (MMCF)	Natural Gas Usage 12 Month Total (MMCF)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

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

**QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Valbruna Slater Stainless, Inc  
 Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
 FESOP Permit No.: F003-23815-00011

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

<p>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, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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>	
<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 an Administrative Amendment to a  
Federally Enforceable State Operating Permit (FESOP)

**Source Description and Location**

**Source Name:** Valbruna Slater Stainless, Inc.  
**Source Location:** 2400 Taylor Street West, Fort Wayne, Indiana 46802  
**County:** Allen  
**SIC Code:** 3312  
**Operation Permit No.:** F 003-23815-00011  
**Operation Permit Issuance Date:** September 6, 2007  
**Administrative Amendment No.:** 003-34799-00011  
**Permit Reviewer:** Doug Logan

On August 4, 2014, the Office of Air Quality (OAQ) received an application from Valbruna Slater Stainless, Inc. related to administrative changes to an existing stationary stainless steel products processing plant.

**Existing Approvals**

The source was issued FESOP No. F003-23815-00011 on September 6, 2007. The source has since received the following approvals:

Permit Number	Issuance Date
Administrative Amendment No. 003-25324-00011	December 21, 2007
Administrative Amendment No. 003-26526-00011	June 18, 2008
Significant Permit Revision No. 003-31404-00011	May 24, 2012

**County Attainment Status**

The source is located in Allen County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. <sup>1</sup>
PM <sub>2.5</sub>	Unclassifiable or attainment effective April 5, 2005, for the annual PM <sub>2.5</sub> standard.
PM <sub>2.5</sub>	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM <sub>2.5</sub> standard.
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<sup>1</sup> Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM<sub>2.5</sub>**  
 Allen County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**  
 Allen 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**

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

**Status of the Existing Source**

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

This PTE table is from the ATSD Appendix A of SPR 003-31404-00011, issued on May 24, 2012.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Amendment (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
Passivation E3	7.88	7.88	7.88	0	<21.53	0	0	0	3.34	3.33 HF
Eight (8) Pre-Heat Charger Furnaces (B2a - B2h)	2.10	8.42	8.42	0.66	<75.0	6.09	<63.0	<90,547.7	2.09	1.99 Hexane
Four (4) Annealing Furnaces (B4a - B4d)	0.43	1.73	1.73	0.14		1.25			0.43	0.41 Hexane
One (1) Annealing Furnace (D3)	0.12	0.46	0.46	0.04		0.33			0.11	0.11 Hexane
Boiler #2	0.03	0.12	0.12	0.01		0.08			0.03	0.028 Hexane
Boiler #3	0.07	0.27	0.27	0.02		0.19			0.07	0.06 Hexane
CDC Boiler	0.08	0.33	0.33	0.03		0.24			0.08	0.079 Hexane
Seven (7) Heat Treat Furnaces	0.57	2.26	2.26	0.18		1.64			0.56	0.54 Hexane
Two (2) Hot Boxes	0.01	0.03	0.03	0.002		0.02			0.007	0.006 Hexane
Ingot Grinding	57.08	57.08	57.08	0	0	0	0	8.53	5.07 Chromium	
Dry Grinding C3	0.07	0.03	0.03	0	0	0	0	0.85	0.51 Chromium	

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Amendment (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
CMI Grinder C5	0.07	0.03	0.03	0	0	0	0	0	0.85	0.51 Chromium
CBM Cut-off Saw D2	4.73	4.73	4.73	0	0	0	0	0	0.99	0.43 Chromium
Insignificant Activity - VAR	3.27	2.85	2.85	0	0	0	0	0	0.66	0.46 Chromium
Insignificant Activity - Grinding, Machining, and Sawing	4.84	4.84	4.84	0	0	0	0	0	0	0
Insignificant Activity - Dry Belt Polisher	4.63	4.63	4.63	0	0	0	0	0	0.93	0.65 Chromium
<b>Total PTE of Entire Source</b>	<b>85.97</b>	<b>95.69</b>	<b>95.69</b>	<b>1.07</b>	<b>&lt;96.53</b>	<b>9.85</b>	<b>&lt;63.0</b>	<b>&lt;90,547.7</b>	<b>19.52</b>	<b>7.64 Chromium</b>
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000	NA	NA

\*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".

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Description of Proposed Amendment**

The Office of Air Quality (OAQ) has reviewed an application, submitted by Valbruna Slater Stainless, Inc. on August 4, 2014, relating to construction of a new heat treating furnace.

The following is a list of the new insignificant activity:

- (a) One (1) heat treat furnace, permitted in 2014, with a maximum capacity of 7.0 MMBtu/hr, using no controls,

The following is a list of the units removed from the source:

- (a) One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, voluntarily controlled by a mist eliminator (ID# E12), and exhausting through stack E12.

The source has provided additional information about the following insignificant activities:

- (a) Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of:
  - (1) Two (2) cold cleaner degreasers without remote solvent reservoirs, constructed after January 1, 1980 and before July 1, 1990. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]
  - (2) Five (5) cold cleaner degreasers with remote solvent reservoirs, constructed after January 1, 1980. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]

**Enforcement Issues**

There are no pending enforcement actions related to this amendment.

**Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

**Permit Level Determination – FESOP Amendment**

The following table is used to determine the appropriate permit level under 326 IAC 2-8-10 (Administrative Permit Amendments). This table reflects the PTE before controls of the proposed amendment. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Amendment (tons/year)							
	PM	PM10	PM2.5	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs
Heat Treat Furnace	5.71x10 <sup>-2</sup>	0.23	0.23	1.80x10 <sup>-2</sup>	3.01	0.17	2.52	5.67x10 <sup>-2</sup>
Cold cleaner degreasers	--	--	--	--	--	3.40	--	3.40x10 <sup>-3</sup>
<b>Total PTE of Proposed Amendment</b>	<b>5.71x10<sup>-2</sup></b>	<b>0.23</b>	<b>0.23</b>	<b>1.80x10<sup>-2</sup></b>	<b>3.01</b>	<b>3.57</b>	<b>2.52</b>	<b>6.01x10<sup>-2</sup></b>
negl. = negligible								

Note: The cold cleaner degreasers are insignificant activities previously named in the permit. PTE calculations are added because the units are subject to additional requirements under revisions to 326 IAC 8-3 adopted during the term of the permit.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4q18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) Pursuant to 326 IAC 2-8-10(a)(6)(D), this change to the permit is considered an administrative amendment because the permit is amended to incorporate or delete applicable requirements as a result of a change in applicability.
- (b) Pursuant to 326 IAC 2-8-10(a)(13), this change to the permit is considered an administrative amendment because the permit is amended to add an emissions unit or modification, subject to 326 IAC 2-1.1-3 (Exemptions), at the request of the Permittee.

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

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of 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 (chromium)
<del>Passivation E3</del>	<del>7.88</del>	<del>7.88</del>	<del>7.88</del>	0	<del>&lt;21.53</del>	0	0	0	3.34	<del>3.33 HF</del>
Eight (8) Pre-Heat Charger Furnaces (B2a – B2h)	2.10	8.42	8.42	0.66	<del>&lt;75.0</del>	6.09	<del>&lt;63.0</del>	<del>&lt;90,547.7</del>	2.09	1.99 Hexane
Four (4) Annealing Furnaces (B4a – B4d)	0.43	1.73	1.73	0.14		1.25			0.43	0.41 Hexane
One (1) Annealing Furnace (D3)	0.12	0.46	0.46	0.04		0.33			0.11	0.11 Hexane
Boiler #2	0.03	0.12	0.12	0.04		0.08			0.03	0.028 Hexane
Boiler #3	0.07	0.27	0.27	0.02		0.19			0.07	0.06 Hexane
CDC Boiler	0.08	0.33	0.33	0.03		0.24			0.08	0.079 Hexane
Seven (7) Heat Treat Furnaces	0.57	2.26	2.26	0.18		1.64			0.56	0.54 Hexane
Two (2) Hot Boxes	0.04	0.03	0.03	0.002		0.02			0.007	0.006 Hexane

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (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 (chromium)
<b>Natural Gas Combustion (excluding 7.0 MMBtu/hr heat treat furnace)<sup>1</sup></b>	3.34	13.35	13.35	1.05	75.00	9.66	63.00		3.31	2.46x10 <sup>-3</sup>
Ingot Grinding (ID #B1) <sup>2</sup>	<del>57.08</del> 44.53	<del>57.08</del> 44.53	<del>57.08</del> 44.53	0 --	0 --	0 --	0 --	0	<del>8.53</del> 6.76 <sup>3</sup>	<del>5.07</del> Chromium 3.96
<b>Insignificant Activities</b>										
Dry Grinding (ID #C3)	<del>0.07</del> 7.01x10 <sup>-2</sup>	0.03	0.03	0 --	0 --	0 --	0 --	0	0.85	0.51 Chromium
CMI Grinder (ID #C5)	<del>0.07</del> 7.01x10 <sup>-2</sup>	0.03	0.03	0 --	0 --	0 --	0 --	0	0.85	0.51 Chromium
CBM Cut-off Saw (ID #D2)	4.73	4.73	4.73	0 --	0 --	0 --	0 --	0	0.99	0.43 Chromium
Insignificant Activity – VAR	3.27	2.85	2.85	0	0	0	0	0	0.66	0.46 Chromium
Insignificant Activity – Grinding, & Machining, and Sawing	4.84 4.51	4.84 4.51	4.84 4.51	0 --	0 --	0 --	0 --	0	0 --	0 --
<b>Sawing</b>	0.33	0.33	0.33	--	--	--	--		--	--
Insignificant Activity – Dry Belt Polisher	4.63	4.63	4.63	0 --	0 --	0 --	0 --	0	0.93	0.65 Chromium
<b>VAR Furnaces</b>	0.25	0.25	0.25	--	--	--	--		2.45x10 <sup>-5</sup>	4.50x10 <sup>-6</sup>
<b>VAR Crucible Cleaning Station</b>	2.95	2.54	2.54	--	--	--	--		0.65	0.46
<b>VAR MIG Welding</b>	6.37x10 <sup>-2</sup>	6.37x10 <sup>-2</sup>	6.37x10 <sup>-2</sup>	--	--	--	--		6.58x10 <sup>-3</sup>	3.47x10 <sup>-3</sup>
<b>Natural Gas Combustion (7.0 MMBtu/hr heat treat furnace)</b>	5.71x10 <sup>-2</sup>	0.23	0.23	1.80x10 <sup>-2</sup>	3.01	0.17	2.52		5.67x10 <sup>-2</sup>	4.21x10 <sup>-5</sup>
<b>Degreasers</b>	--	--	--	--	--	3.40	--		6.80x10 <sup>-3</sup>	--
Total PTE of Entire Source	<del>85.97</del> 65.53	<del>95.69</del> 75.22	<del>95.69</del> 75.22	1.07	<del>96.53</del> 78.01	9.85 13.23	<del>63.0</del> 65.52	<del>90,547.7</del>	19.52 14.41	<del>7.64</del> 6.52 Chromium
Title V Major Source Thresholds	NA	100	100	100	100	100	100	400,000	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	400,000	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . ***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.										

**Notes:**

1. Combustion PTE revised based on natural gas heating value of 1,020 Btu/CF.
2. SPR 003-31404-00011 repeated a typographical error, previously corrected in AA 003-25324-00011 showing the capacity of the ingot grinding facility (ID# B1) as 13.163 tons/hr rather than the correct value of 10.27 tons/hr. This table is based on the corrected capacity.

3. HAP PTE for ingot grinding includes emissions of arsenic, cadmium, selenium, and lead from FESOP 003-23815-00011 that were not included in SPR 003-31404-00011.

The table below summarizes the potential to emit of the entire source after issuance of this amendment, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source after Issuance (tons/year)								
	PM	PM10*	PM2.5**	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Total HAPs	Worst Single HAP (chromium)
Natural Gas Combustion (excluding 7.0 MMBtu/hr heat treat furnace)	3.34	13.35	13.35	1.05	75.00	9.66	63.00	3.31	2.46x10 <sup>-3</sup>
Ingot Grinding (ID# B1)	44.53	44.53	44.53	--	--	--	--	6.76	3.96
Insignificant Activities									
Dry Grinding (ID# C3)	7.01x10 <sup>-2</sup>	3.15x10 <sup>-2</sup>	3.15x10 <sup>-2</sup>	--	--	--	--	0.85	0.51
CMI Grinder (ID# C5)	7.01x10 <sup>-2</sup>	3.15x10 <sup>-2</sup>	3.15x10 <sup>-2</sup>	--	--	--	--	0.85	0.51
CBM Cutoff Saw (ID# D2)	4.73	4.73	4.73	--	--	--	--	0.99	0.43
Grinding & Machining	4.51	4.51	4.51	--	--	--	--		
Sawing	0.33	0.33	0.33	--	--	--	--		
Dry Belt Polisher	4.63	4.63	4.63	--	--	--	--	0.93	0.65
VAR Furnaces	0.25	0.25	0.25	--	--	--	--	2.45x10 <sup>-5</sup>	4.50x10 <sup>-6</sup>
VAR Crucible Cleaning Station	2.95	2.54	2.54	--	--	--	--	0.65	0.46
VAR MIG Welding	6.37x10 <sup>-2</sup>	6.37x10 <sup>-2</sup>	6.37x10 <sup>-2</sup>	--	--	--	--	6.58x10 <sup>-3</sup>	3.47x10 <sup>-3</sup>
Natural Gas Combustion (7.0 MMBtu/hr heat treat furnace)	5.71x10 <sup>-2</sup>	0.23	0.23	1.80x10 <sup>-2</sup>	3.01	0.17	2.52	5.67x10 <sup>-2</sup>	4.21x10 <sup>-5</sup>
Degreasers	--	--	--	--	--	3.40	--	--	6.80x10 <sup>-3</sup>
<b>Total PTE of Entire Source</b>	<b>65.53</b>	<b>75.22</b>	<b>75.22</b>	<b>1.07</b>	<b>78.01</b>	<b>13.23</b>	<b>65.52</b>	<b>14.41</b>	<b>6.52</b>
Title V Major Source Thresholds	-	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> .									

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4q18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4q18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of

a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) FESOP Status

This amendment to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants and HAPs 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>Federal Rule Applicability Determination</b>
-------------------------------------------------

(a) New Source Performance Standards (NSPS)

(1) The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, and 326 IAC 12, are not included for this proposed amendment, since the heat treat furnace is not a steam generating unit.

(2) There are no other New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included for this proposed amendment.

(b) National Emission Standards for Hazardous Air Pollutants (NESHAP)

(1) The requirements of the National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63 7480, Subpart DDDDD and 326 IAC 20-95, are not included for this proposed amendment, because the source is not a major source of HAP emissions.

(2) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63 11193, Subpart JJJJJJ, are not included for this proposed amendment, because the heat treat furnace is not a boiler as defined in 40 CFR 63.11237.

(3) There are no other National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included for this proposed amendment.

(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.

<b>State Rule Applicability Determination</b>
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(a) 326 IAC 2-8-4 (FESOP)

This amendment 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). See PTE of the Entire Source After Issuance of the FESOP Amendment Section above.

(b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

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. See PTE of the Entire Source After Issuance of the FESOP Amendment Section above.

- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed amendment is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (f) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)  
The heat treat furnace does not use combustion for indirect heating, therefore 326 IAC 6-2-4 is not applicable to the proposed amendment.
- (g) 326 IAC 8-3 (VOC Rules: Organic Solvent Degreasing Operations)
  - (1) Pursuant to 326 IAC 8-3-1(c)(1)(B), cold cleaner degreasers without remote solvent reservoirs constructed after January 1, 1980 and before July 1, 1990 and cold cleaner degreasers with remote solvent reservoirs constructed after January 1, 1980 are subject to 326 IAC 8-3-2(a).  
  
Pursuant to 326 IAC 8-3-2(a) (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met:
    - (A) Equip the degreaser with a cover.
    - (B) Equip the degreaser with a device for draining cleaned parts.
    - (C) Close the degreaser cover whenever parts are not being handled in the degreaser.
    - (D) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
    - (E) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (C), (D), (F), and (G).
    - (F) Store waste solvent only in closed containers.

- (G) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (2) Pursuant to 326 IAC 8-3-8(a)(2), on and after January 1, 2015 cold cleaner degreasers at the source are subject to the following:
  - (A) Pursuant to 326 IAC 8-3-8(b)(2), no person shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
  - (B) Pursuant to 326 IAC 8-3-8(c)(2), the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations.
    - (i) The name and address of the solvent supplier.
    - (ii) The date of purchase.
    - (iii) The type of solvent purchased.
    - (iv) The total volume of the solvent purchased.
    - (v) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

Pursuant to 326 IAC 8-3-8(d), these records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

- (h) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

#### **Compliance Determination, Monitoring and Testing Requirements**

The existing compliance requirements will not change as a result of amendment. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP SPR No: F003-31404-00011, issued on May 24, 2012.

#### **Proposed Changes**

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

#### **Summary of IDEM Updates Throughout the Permit**

- (a) IDEM, OAQ has decided to remove all references to the source mailing address. IDEM, OAQ will continue to maintain records of the mailing address.
- (b) IDEM, OAQ has decided that the phrases "no later than" and "not later than" are clearer than "within" in relation to the end of a timeline. Therefore, all references to timelines have been revised to "no later than" or "not later than".
- (c) IDEM, OAQ has decided to clarify Section B - Certification to be consistent with the rule and to clarify that Section B - Certification only states what a certification must be.

- (d) Several of IDEM's Branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to Permit Administration and Development Section and the Permits Branch have been changed to Permit Administration and Support Section. References to Asbestos Section, Compliance Data Section, Air Compliance Section, and Compliance Branch have been changed to Compliance and Enforcement Branch.
- (e) IDEM, OAQ has added a new paragraph (b) to handle a future situation where the Permittee adds units that need preventive maintenance plans developed. IDEM has decided to clarify other aspects of Section B - Preventive Maintenance Plan.
- (f) IDEM, OAQ has decided that having a separate condition for the reporting of deviations is unnecessary. Therefore, Section B - Deviation from Permit Requirements and Conditions has been removed and the requirements of that condition have been added to Section C - General Reporting Requirements. Paragraph (d) of Section C - General Reporting Requirements has been removed because IDEM, OAQ already states the timeline and certification needs of each report in the condition requiring the report.
- (g) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule cites listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in Section B - Operational Flexibility. IDEM, OAQ has clarified the rule cites for the Preventive Maintenance Plan.
- (h) IDEM, OAQ has revised Section B - Duty to Provide Information by removing the statement that the submittal by the Permittee requires the certification by the "responsible official".
- (i) IDEM, OAQ is revising Section B - Emergency Provisions to delete paragraph (h). 326 IAC 2-8-4(3)(C)(ii) allows that deviations reported under an independent requirement do not have to be included in the Quarterly Deviation and Compliance Monitoring Report.
- (j) IDEM, OAQ has decided to state which rule establishes the authority to set a deadline for the Permittee to submit additional information. Therefore, Section B - Permit Renewal has been revised.
- (k) IDEM, OAQ has decided to reference 326 IAC 2 in Section B - Source Modification Requirement rather than the specific construction rule.
- (l) IDEM, OAQ has added 326 IAC 5-1-1 to the exception clause of Section C - Opacity, since 326 IAC 5-1-1 does list exceptions.
- (m) IDEM, OAQ has revised Section C - Incineration to more closely reflect the two underlying rules.
- (n) IDEM, OAQ has removed the first paragraph of Section C - Performance Testing due to the fact that specific testing conditions elsewhere in the permit will specify the timeline and procedures.
- (o) IDEM, OAQ has revised Section C - Compliance Monitoring. The reference to recordkeeping has been removed due to the fact that other conditions already address recordkeeping. The voice of the condition has been changed to clearly indicate that it is the Permittee that must follow the requirements of the condition. IDEM is changing the Section C - Compliance Monitoring Condition to clearly describe when new monitoring for new and existing units must begin.
- (p) IDEM, OAQ has removed Section C - Monitoring Methods. The conditions that require the monitoring or testing, if required, state what methods shall be used.
- (q) IDEM has clarified Section C - Instrument Specifications to indicate that the analog instrument must be capable of measuring the parameters outside the normal range.
- (r) IDEM, OAQ has revised Section C - Response to Excursions or Exceedances. The introduction sentence has been added to clarify that it is only when an excursion or exceedance is detected that the requirements of this condition need to be followed. The word "excess" was added to the last sentence of paragraph (a) because the Permittee only has to minimize excess emissions. The middle of paragraph (b) has been deleted as it was duplicative of paragraph (a). The phrase "or are returning" was added to subparagraph (b)(2) as this is an acceptable response assuming the operation or emission unit does return to normal or its usual manner of operation. The phrase "within

- the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable" was replaced with "normal or usual manner of operation" because the first phrase is just a limited list of the second phrase. The recordkeeping required by paragraph (e) was changed to require only records of the response because the previously listed items are required to be recorded elsewhere in the permit.
- (t) IDEM, OAQ has revised Section C - Actions Related to Noncompliance Demonstrated by a Stack Test. The requirements to take response steps and minimize excess emissions have been removed because Section C - response to Excursions or Exceedances already requires response steps related to exceedances and excess emissions minimization. The start of the timelines was revised from "the receipt of the test results" to "the date of the test". There was confusion if the "receipt" was by IDEM, the Permittee or someone else. Since the start of the timelines has been moved up, the length of the timelines was increased. The new timelines require action within a comparable timeline; and the new timelines still ensure that the Permittee will return to compliance within a reasonable timeframe.
- (u) The voice of paragraph (b) of Section C - General Record Keeping Requirements has been changed to clearly indicate that it is the Permittee that must follow the requirements of the paragraph. IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. IDEM has added "where applicable" to the lists in Section C - General Record Keeping Requirements to more closely match the underlining rule.
- (v) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
- (w) IDEM, OAQ has simplified the referencing in Section C - Compliance with 40 CFR 82 and 326 IAC 22-1.
- (x) On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at [http://www.supremecourt.gov/opinions/13pdf/12-1146\\_4g18.pdf](http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf)) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."  
The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification. Therefore, IDEM, OAQ has removed all GHG-related permit requirements.

#### Section A - Revisions

- (a) IDEM, OAQ has deleted paragraph (c) of Condition A.2 because the passivation system (ID #E3) was removed from the source.
- (b) IDEM, OAQ has added a new insignificant activity (g) to Condition A.3 and succeeding items were relettered
- (c) IDEM, OAQ has revised paragraph (dd), formerly (cc), in Condition A.3 to clarify the applicability of 326 IAC 8-3.
- (d) Section A has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

#### Section A has been revised as follows:

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

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The Permittee owns and operates a stationary stainless steel products processing plant.

Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: ~~P.O. Box 630, Fort Wayne, IN 46801~~  
General Source Phone Number: 260-434-2955  
SIC Code: 3312  
County Location: Allen  
Source Location Status: Attainment for all criteria pollutants  
Source Status: Federally Enforceable State Operating Permit Program  
Minor Source, under PSD Rule  
Minor Source, Section 112 of the Clean Air Act  
Not 1 of 28 Source Categories

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

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

(a) ...

~~(c) Cold Finishing~~

~~(1) One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, voluntarily controlled by a mist eliminator (ID# E12), and exhausting through stack E12;~~

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

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This stationary source also includes the following insignificant activities, as defined in [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(1)]:

(a) ...

(f) Seven (7) natural gas-fired heat treat furnaces with a maximum heat input capacity of 9.72 million Btu per hour, each;

**(g) One (1) natural gas-fired heat treat furnace with a maximum heat input capacity of 7.00 million Btu per hour;**

(gh) Continuous Draw Cell Line

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation;

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching;

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC;

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.003 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute [326 IAC 6-3-2]; and

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with

the intermediate and final alkaline cleaning operations [326 IAC 6-3-2].

- (hi) Vacuum Arc Remelting
  - (1) One (1) MIG Welding Station (ID# MWS), approved for construction in 2007, with a maximum capacity of four (4) welds and four (4) cuts per 24 hours, controlled by a baghouse (ID# MWS-1), and exhausting inside the building;
  - (2) Two (2) Vacuum Arc Remelting furnaces (ID# VAR1 & VAR2), approved for construction in 2007, each with a heat input capacity of 1680 Kilo Volt Amperes (kVA), each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, each controlled by a 50 horsepower (HP) vacuum mist eliminator (ID# VAR1-V & VAR2-V), and exhausting inside the building;
  - (3) Two (2) natural gas-fired Hot Boxes (ID# HB1 & HB2), approved for construction in 2007, each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, with a maximum heat input capacity of 0.4 million British thermal units per hour, with emissions uncontrolled and exhausting inside the building; and
  - (4) One (1) Crucible Cleaning Station (ID# CCS) constructed in 2007, with a maximum capacity of four (4) crucibles per 24 hours, controlled by a baghouse (ID# CCS-1), and exhausting inside the building.
- (ij) Electro slag remelt operation, identified as ESR;
- (jk) Combustion source flame safety purging start up;
- (kl) One (1) gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;
- (lm) One (1) petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;
- (mn) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
- (no) Refractory storage not requiring air pollution control equipment;
- (op) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
- (pq) Machining where an aqueous cutting coolant continuously floods the machining interface;
- (qr) Cleaners and solvents characterized as follows:
  - (1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 C (100 F); or
  - (2) having a vapor pressure equal to or less than 0.7 kilopascal; 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;

- (fs) Closed loop heating and cooling systems;
- (st) Forced and induced draft noncontact cooling tower system not regulated under a NESHAP;
- (tu) Quenching operations used with heat treating processes;
- (uv) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment;
- (vw) Heat exchanger cleaning and repair;
- (wx) Process vessel degassing and cleaning to prepare for internal repairs;
- (xy) Paved roads and parking lots with public access;
- (yz) 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;
- (zaa) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;
- (aabb) Furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;
- (bcc) A laboratory as defined in 326 IAC 2-7-1(21)(D);
- (eedd) ~~Safety clean parts washers for maintenance work;~~  
**Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of:**
  - (1) **Two (2) cold cleaner degreasers without remote solvent reservoirs, constructed after January 1, 1980 and before July 1, 1990. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]**
  - (2) **Five (5) cold cleaner degreasers with remote solvent reservoirs, constructed after January 1, 1980. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]**
- (deee) Noncontact cooling towers used with chiller systems (no chromates);
- (eeff) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations [326 IAC 6-3-2];
- (ffgg) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (gghh) One (1) dry belt polisher, approved for construction in 2008, with a maximum capacity of 2.64 tons of steel bar per hour, controlled by a dust collector, and exhausting inside the building.

**Section B and Section C - Revisions**

- (a) Section B and Section C have been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDE Updates Throughout the Permit."

**Section B and Section C have been revised as follows:**

...

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

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

...

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. ~~The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~ Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) ~~Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance~~ **A certification submitted shall contain required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:**
- (1) it contains a certification by an "authorized individual" of truth, accuracy, , as defined by 326 IAC 2-1.1-1(1), and completeness. This**
  - (2) the certification shall state states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.**
- (b) ~~One (1) certification shall be included, using~~ **The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.**
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
**Compliance and Enforcement Branch, Office of Air Quality**

**100 North Senate Avenue**  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require ~~thea~~ 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.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][~~326 IAC 2-8-5(a)(1)~~]

---

~~(a)~~ **A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:**

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

**The Permittee shall implement the PMPs.**

(b) If required by specific condition(s) in Section D of this permit **where no PMP was previously required**, the Permittee shall **prepare and maintain and implement** 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.

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

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

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

**The Permittee shall implement the PMPs.**

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

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

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

emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance ~~Section~~ **and Enforcement Branch**), or  
Telephone Number: 317-233-0178 (ask for **Office of Air Quality, Compliance ~~Section~~ **and Enforcement Branch**)  
Facsimile Number: 317-233-6865**

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

~~(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

...

~~B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]~~

~~(a) Deviations from any permit requirements (for emergencies see Section B – Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251~~

~~using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

~~(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.~~

~~B.16B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]~~

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

**B.4716 Permit Renewal [326 IAC 2-8-3(h)]**

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- (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(4042). The renewal application does require thea 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  
~~Permits Branch, Office of Air Quality~~  
~~400 North Senate Avenue~~  
**Permit Administration and Support Section, Office of Air Quality**  
**100 North Senate Avenue**  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

**B.4817 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]**

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- (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  
~~Permits Branch, Office of Air Quality~~  
~~400 North Senate Avenue~~  
**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 ~~shall be certified~~ **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.4918 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) ~~through (d)~~ **and (c)** without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:  
  
Indiana Department of Environmental Management  
~~Permits Branch, Office of Air Quality~~  
~~100 North Senate Avenue~~  
**Permit Administration and Support Section, Office of Air Quality**  
**100 North Senate Avenue**  
MC 61--53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and  
  
United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) ~~through (d)~~ **(1) and (c)**. The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) Emission Trades [326 IAC 2-8-15(~~eb~~)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(~~eb~~).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(~~dc~~)]  
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.2019** Source Modification Requirement [326 IAC 2-8-11.1]

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 ~~and~~ 326 IAC 2-8-11.1.

**B.2420** 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]

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...

**B.2221** Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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- (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  
~~Permits Branch, Office of Air Quality~~  
~~400 North Senate Avenue~~  
**Permit Administration and Support Section, Office of Air Quality**  
**100 North Senate Avenue**  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

~~The~~**Any such** application ~~which shall be submitted by the Permittee~~ does require ~~the~~ 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.2322** 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]

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- (a) The Permittee shall pay annual fees to IDEM, OAQ ~~within~~**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) ...

**B.2423** Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]

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...

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit any regulated pollutant, except particulate matter (PM) ~~and~~

~~greenhouse gases (GHGs), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.~~

- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
  - ~~(4) The potential to emit greenhouse gases (GHGs) from the entire source shall be limited to less than one hundred thousand (100,000) tons of CO<sub>2</sub>-equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period.~~
- (b) **The Pursuant to 326 IAC 2-2 (PSD)**, potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. ~~This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.~~
  - (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
  - (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

### C.3 Opacity [326 IAC 5-1]

---

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

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

...

### C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

...

### C.7 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 ~~by using ambient air quality modeling pursuant to 326 IAC 1-7-4.~~

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
~~Asbestos Section, Office of Air Quality~~  
~~100 North Senate Avenue~~  
**Compliance and Enforcement Branch, Office of Air Quality**  
**100 North Senate Avenue**  
MC 61-52-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Demolition and Renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the

demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) **Indiana Accredited 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 Accredited Licensed** Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

C.9 Performance Testing [326 IAC 3-6]

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~~(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.~~

- (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 Data Section, Office of Air Quality~~  
~~100 North Senate Avenue~~  
**Compliance and Enforcement Branch, Office of Air Quality**  
**100 North Senate Avenue**  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

...

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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- (a) **For new units:**  
**Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.**
- (b) **For existing units:**  
Unless otherwise specified in this permit, ~~for all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related~~ **allowed up to that equipment. If ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, that any monitoring equipment required by this permit cannot be installed and operated**

~~within~~ **no later than** ninety (90) days **after permit issuance**, 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 Branch, Office of Air Quality~~  
~~100 North Senate Avenue~~  
**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 ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

~~C.12~~ ~~Monitoring Methods~~ [326 IAC 3] [40 CFR 60] [40 CFR 63]

~~Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.~~

**C.12C.13** Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

**C.13 Risk Management Plan** [326 IAC 2-8-4] [40 CFR 68]

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

~~C.14~~ Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

~~(a)~~ ~~Upon detecting an excursion or~~ **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

~~and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions.~~ **The response** may include, but ~~are~~**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 ~~within the indicator range, designated condition,~~**normal** or ~~below the applicable emission limitation or standard, as applicable~~**usual manner of operation.**
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records; and/or
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall ~~maintain the following records:~~**record the reasonable response steps taken.**
- (1) ~~monitoring data;~~
  - (2) ~~monitor performance data, if applicable; and~~
  - (3) ~~corrective actions taken.~~

~~C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]~~

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

~~C.16~~**C.15** Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall ~~take appropriate response actions. The Permittee shall submit a description of these~~**its response actions to IDEM, OAQ, within thirty (30 no later than seventy-five (75) days of receipt after the date of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.**
- (b) A retest to demonstrate compliance shall be performed ~~within~~**no later than** one hundred ~~twenty (120)~~**eighty (180) days of receipt of after the original date of the test results.** Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred ~~twenty (120)~~**eighty (180) days** is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require ~~the~~ 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.4716 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, where applicable:**

- (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, where applicable:**

- (AA) The date, place, as defined in 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 within a reasonable time.

- (b) Unless otherwise specified in this permit, **for** all record keeping requirements not already legally required, **the Permittee** shall be implemented within **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.4817 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (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~~ **not later than** thirty (30) days ~~after~~ the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include ~~the~~ certification **that meets the requirements of 326 IAC 2-8-5(a)(1)** by an "authorized individual" as defined by 326 IAC ~~2-4-1-1(-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 required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to **submittal is:**

Indiana Department of Environmental Management  
Compliance ~~Data Section~~ 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 and ~~OES~~ on or before the date it is due.
- ~~(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.~~ **(d)** Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

~~C.4018~~ 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 ~~the~~ **applicable** standards for recycling and emissions reduction:

- ~~(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.~~
- ~~(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.~~
- ~~(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.~~

**Section D.1 - Revisions**

- (a) IDEM, OAQ has added natural gas-fired insignificant activities to the emissions unit description box to clarify that the FESOP limit on natural gas throughput includes the insignificant activities.
- (b) IDEM, OAQ has added a new insignificant activity (g) to the emissions unit description box and succeeding items were relettered
- (c) IDEM, OAQ has revised the number of heat treat furnaces in Condition D.1.2.
- (d) IDEM, OAQ has updated the language of Condition D.1.2 to match the current model.
- (e) IDEM, OAQ has updated the language of Condition D.1.4 to match the current model.
- (f) IDEM, OAQ has updated the language of Condition D.1.5 to match the current model.
- (g) Section D.1 has been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDE Updates Throughout the Permit."

**Section D.1 has been revised as follows:**

SECTION D.1                      EMISSIONS UNIT OPERATION CONDITIONS

--

Emissions Unit Description:

(a) Primary Mill

- (1) One (1) ingot grinding operation (ID# B1), constructed in 1988, with a maximum capacity of 10.27 tons per hour, controlled by a voluntary dust collection house ID# E4, and exhausting through vent E4;
- (2) Eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h), constructed in 1968, with a maximum combined preheat capacity of 10.27 tons per hour, with a maximum heat input capacity of 31.6 million Btu per hour, each, emissions uncontrolled and exhausting inside the building; and
- (3) Four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d), constructed in 1968, with a maximum combined annealing capacity of 10.27 tons per hour, with a maximum heat input capacity of 13.0 million Btu per hour, each, emissions uncontrolled and exhausting inside the building.

(b) Continuous Bar Mill and Annealing

- (1) One (1) natural gas-fired annealing furnace (ID# D3), constructed in 1990, with a maximum heat input capacity of 13.9 million Btu per hour, emissions uncontrolled, and exhausting inside the building.

**Insignificant Activities**

(c) **One (1) natural gas-fired boiler, identified as # 2, constructed in 1979, with a maximum heat input capacity of 3.5 million Btu per hour, exhausting through stack E15 [326 IAC 6-2-3];**

(d) **One (1) natural gas-fired boiler, identified as # 3, constructed in 1990, with a maximum heat input capacity of 8.0 million Btu per hour, exhausting through stack E16 [326 IAC 6-2-4];**

(e) **One (1) natural gas-fired boiler, identified as CDC boiler, constructed in 1998, with a maximum heat input capacity of 10.0 million Btu per hour, exhausting through CDC boiler stacks [326 IAC 6-2-4];**

(g) **One (1) natural gas-fired heat treat furnace with a maximum heat input capacity of 7.00 million Btu per hour;**

(i) Vacuum Arc Remelting

- (3) **Two (2) natural gas-fired Hot Boxes (ID# HB1 & HB2), constructed in 2007, each with a maximum capacity of two (2) ten thousand (10,000) pound ingots per 24 hours, with a maximum heat input capacity of 0.4 million British thermal units per hour, with emissions uncontrolled and exhausting inside the building.**

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

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

...

~~D.1.2 Part 70 Minor Limits FESOP~~ [326 IAC 2-8-4] [326 IAC 2-2]

~~In order to comply with the requirements of Pursuant to 326 IAC 2-8-4 (FESOP), and to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable, the Permittee shall comply with the following:~~

- (a) The natural gas usage of the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace three (3) boilers, seven (7) heat treat furnaces, and two (2) hot boxes shall be less than 1,500 million cubic feet of natural gas per twelve (12) consecutive month period, with compliance determined at the end of each month.
  - (i) The nitrogen oxides (NOx) emissions from natural gas combustion shall not exceed 100 pounds per million cubic feet (lb/MMcf).
  - (ii) The carbon monoxide (CO) emissions from natural gas combustion shall not exceed 84 pounds per million cubic feet (lb/MMcf).
- ~~(b) The combined CO<sub>2</sub>e emissions from combusting natural gas in the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace three (3) boilers, seven (7) heat treat furnaces, and two (2) hot boxes shall be less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~

~~Compliance with these the above limits, combined with the potential to emit NO<sub>x</sub> and CO and carbon dioxide equivalent emissions (CO<sub>2</sub>e) from all other emission units at the source, shall limit the source-wide total NO<sub>x</sub> and CO emissions to less than 100 tons per twelve (12) consecutive month period, each, the source-wide total greenhouse gas (GHG) emissions to less than 100,000 tons of carbon dioxide equivalent emissions (CO<sub>2</sub>e) per twelve (12) consecutive month period, and shall render the requirements of emissions from the entire source to less than 100 tons each of NO<sub>x</sub> and CO per twelve (12) consecutive month period and render 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.~~

Compliance Determination Requirements

~~D.1.3 CO<sub>2</sub>e Emissions~~

~~In order to comply with Condition D.1.2(b), the Permittee shall use the following equations to determine the tons of CO<sub>2</sub>e emitted per twelve (12) consecutive month period:~~

- ~~(a) Carbon Dioxide Equivalent (CO<sub>2</sub>e) emissions calculation:~~

$$\text{CO}_2 = \frac{G(\text{EG}_{\text{CO}_2})}{2,000 \text{ lbs/ton}}$$

$$\text{CH}_4 = \frac{G(\text{EG}_{\text{CH}_4})}{2,000 \text{ lbs/ton}}$$

$$\text{N}_2\text{O} = \frac{G(\text{EG}_{\text{N}_2\text{O}})}{2,000 \text{ lbs/ton}}$$

$$\text{CO}_{2e} = \sum [(\text{CO}_2 \times \text{CO}_2 \text{ GWP}) + (\text{CH}_4 \times \text{CH}_4 \text{ GWP}) + (\text{N}_2\text{O} \times \text{N}_2\text{O GWP})]$$

*Where:*

~~CO<sub>2</sub> = tons of CO<sub>2</sub> emissions for previous 12 consecutive month period  
CH<sub>4</sub> = tons of CH<sub>4</sub> emissions for previous 12 consecutive month period  
N<sub>2</sub>O = tons of N<sub>2</sub>O emissions for previous 12 consecutive month period  
CO<sub>2</sub>e = tons of CO<sub>2</sub>e equivalent emissions for previous 12 consecutive month period  
G = million cubic feet of natural gas used in previous 12 months  
EG<sub>CO<sub>2</sub></sub> = 120,000 pounds per million cubic feet of natural gas  
EG<sub>CH<sub>4</sub></sub> = 2.3 pounds per million cubic feet of natural gas  
EG<sub>N<sub>2</sub>O</sub> = 2.2 pounds per million cubic feet of natural gas~~

~~Global Warming Potentials (GWP)~~

~~Carbon dioxide (CO<sub>2</sub>) = 1  
Methane (CH<sub>4</sub>) = 21  
Nitrous oxide (N<sub>2</sub>O) = 310~~

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

D.1.43 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through ~~(32)~~ below. Records maintained for (1) through ~~(32)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the limits established in Conditions D.1.2.
- ~~(1) Calendar dates covered in the compliance determination period;~~
  - ~~(2) Actual natural gas usage each month; and~~
  - ~~(3) Carbon dioxide equivalent emission rates for natural gas used at the source per month.~~
- (b) ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit~~ **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.**

D.1.54 Reporting Requirements

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~~A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported~~ **not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.** The report ~~submitted by the Permittee does require the certification by the~~ **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).**

**Section D.3 - Revisions**

- (a) IDEM, OAQ has deleted the passivation system (ID# E3) from the emissions unit description box because the system has been removed.
- (b) IDEM, OAQ has added insignificant activity (dd) to the emissions unit description box.
- (c) IDEM, OAQ has added Conditions D.3.1, D.3.2, and D.3.3 to incorporate the requirements of 326 IAC 8-3.

**Section D.3 has been revised as follows:**

**SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

(c) — Cold Finishing

(1) — One (1) passivation system (ID# E3), constructed in 1993, with a maximum capacity of 4.0 tons of stainless steel bars per hour, controlled by a mist eliminator (ID# E12), and exhausting through stack E12;

**Insignificant Activities**

(dd) **Degreasing operations that do not exceed one hundred forty-five (145) gallons per twelve (12) months, except if subject to 326 IAC 20-6, consisting of:**

(1) **Two (2) cold cleaner degreasers without remote solvent reservoirs, constructed after January 1, 1980 and before July 1, 1990. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]**

(2) **Five (5) cold cleaner degreasers with remote solvent reservoirs, constructed after January 1, 1980. [326 IAC 8-3-2(a)] [326 IAC 8-3-8]**

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

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

~~D.3.1 Part 70 Minor Limit [326 IAC 2-8-4]~~

~~The passivation production for the passivation system shall be less than 35,000 tons of steel per 12 consecutive month period, with compliance determined at the end of each month, and the NOx emissions from the passivation system shall not exceed 1.23 pounds per ton of metal.~~

~~Compliance with the above limits and Condition D.1.2, will limit the source wide NOx emissions to less than 100 tons per twelve (12) consecutive month period, and will render 326 IAC 2-7 (Part 70) not applicable to the source.~~

~~D.3.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]~~

~~Pursuant to 326 IAC 6-3-2(e), (Particulate Emissions Limitations for Manufacturing Processes), the allowable particulate matter (PM) emissions from the passivation system shall not exceed the emission limits shown in the table below:~~

<b>Operation</b>	<b>Process Weight (tons/hr)</b>	<b>Allowable Limits (lbs/hr)</b>
Passivation System	4.0	10.4

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour was determined by use of the equation:~~

~~$E = 4.10 \times P^{0.67}$~~

~~Where:~~

~~P = process weight in tons/hr; and  
 E = rate of emission in pounds per hour.~~

**D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]**

**Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control and Equipment Operating Requirements), the Permittee shall:**

- (a) **Ensure the following control equipment and operating requirements are met:**
- (1) **Equip the degreaser with a cover.**
  - (2) **Equip the degreaser with a device for draining cleaned parts.**
  - (3) **Close the degreaser cover whenever parts are not being handled in the degreaser.**
  - (4) **Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.**
  - (5) **Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).**
  - (6) **Store waste solvent only in covered containers.**
  - (7) **Prohibit the dispose or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**

**D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]**

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**Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).**

~~Compliance Determination Requirements~~

~~D.3.3 Nitrogen Oxides (NO<sub>x</sub>)~~

---

~~The chemical suppression blanket for NO<sub>x</sub> emissions and the mist eliminator shall be in operation at all times the passivation system is in operation.~~

~~D.3.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]~~

---

~~A Preventative Maintenance Plan, in accordance with Section B—Preventive Maintenance Plan of this permit, is required for this facility and their control devices.~~

~~D.3.5 Testing requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]~~

~~Within sixty (60) days after the restart of the passivation system, the Permittee shall perform NO<sub>x</sub> testing on the passivation system utilizing methods as approved by the Commissioner. This testing shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C-Performance Testing.~~

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

~~D.3.6 Monitoring of Surface Tension of Each Passivation Bath~~

~~The Permittee shall maintain the surface tension of the passivation bath such that the surface tension does not exceed 24 dynes per centimeter. The Permittee shall take a reasonable response step if the surface tension is greater than 24 dynes per centimeter for any one reading 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.~~

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

~~D.3.7 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.3.6, the Permittee shall maintain daily records of the surface tension of the passivation bath. The Permittee shall include in its daily record when the record of the surface tension of the passivation bath is not taken and the reason for the lack of surface tension records, (e.g. the process did not operate that day).~~
- ~~(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.~~

**D.3.3 Record Keeping Requirements**

- (a) To document the compliance status with Condition D.3.2, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.**
- (1) The name and address of the solvent supplier.**
  - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).**
  - (3) The type of solvent purchased.**
  - (4) The total volume of the solvent purchased**
  - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).**
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.**

**Reporting Forms - Revisions**

- (a) IDEM, OAQ has decided to remove the last sentence dealing with the need for certification from the forms because the Conditions requiring the forms already address this issue.

- (b) The phrase "of this permit" has been added to the paragraph of the Quarterly Deviation and Compliance Monitoring Report to match the underlying rule.
- (c) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
- (d) IDEM, OAQ has deleted the Semi-Annual Natural Gas Fired Boiler Certification.
- (e) IDEM, OAQ has clarified the description in the FESOP Quarterly Report to indicate that the 7.00 MMBtu/hr heat treat furnace is not subject to the FESOP limit.
- (f) Reporting forms have been revised to incorporate the appropriate IDEM updates detailed above under "Summary of IDEM Updates Throughout the Permit."

**Reporting Forms have been revised as follows:**

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

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

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: ~~P.O. Box 630, Fort Wayne, IN 46801~~  
FESOP Permit No.: F003-23815-00011

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: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
Mailing Address: ~~P.O. Box 630, Fort Wayne, IN 46801~~  
FESOP Permit No.: F003-23815-00011

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

Date/Time Emergency started:
------------------------------

Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N 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: \_\_\_\_\_

~~A certification is not required for this report.~~

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION~~

~~FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)~~

**SEMI-ANNUAL  
 NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: \_\_\_\_\_ Valbruna Slater Stainless, Inc \_\_\_\_\_  
 Source Address: \_\_\_\_\_ 2400 Taylor Street West, Fort Wayne, Indiana 46802 \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ P.O. Box 630, Fort Wayne, IN 46801 \_\_\_\_\_  
 FESOP Permit No.: \_\_\_\_\_ F003-23815-00011 \_\_\_\_\_

<input type="checkbox"/> Natural Gas Only <input type="checkbox"/> Alternate Fuel burned From: _____ To: _____
----------------------------------------------------------------------------------------------------------------------

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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: \_\_\_\_\_ Valbruna Slater Stainless, Inc \_\_\_\_\_  
 Source Address: \_\_\_\_\_ 2400 Taylor Street West, Fort Wayne, Indiana 46802 \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ P.O. Box 630, Fort Wayne, IN 46801 \_\_\_\_\_  
 FESOP Permit No.: \_\_\_\_\_ F003-23815-00011 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Cold Finishing \_\_\_\_\_  
 Parameter: \_\_\_\_\_ Passivation System \_\_\_\_\_  
 Limit: \_\_\_\_\_ Less than 35,000 tons of steel per twelve consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month (tons)	Previous 11 Months (tons)	12-Month Total (tons)
Month 1			
Month 2			

Month 3			

~~\_\_\_\_\_  No deviation occurred in this quarter.~~

~~\_\_\_\_\_  Deviation/s occurred in this quarter.~~

~~\_\_\_\_\_ Deviation has been reported on: \_\_\_\_\_~~

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

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

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

FESOP Quarterly Report

Source Name: Valbruna Slater Stainless, Inc  
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
~~Mailing Address: P.O. Box 630, Fort Wayne, IN 46801~~  
FESOP Permit No.: F003-23815-00011  
Facility: Sourcewide  
Parameter: Annual Natural Gas Usage  
Limits: Less than 1500 million cubic feet (MMCF) per twelve consecutive month period.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	Natural Gas Usage This Month (MMCF)	Natural Gas Usage Previous 11 Months (MMCF)	Natural Gas Usage 12 Month Total (MMCF)
Month 1			
Month 2			
Month 3			

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: \_\_\_\_\_ Valbruna Slater Stainless, Inc \_\_\_\_\_  
 Source Address: \_\_\_\_\_ 2400 Taylor Street West, Fort Wayne, Indiana 46802 \_\_\_\_\_  
 Mailing Address: \_\_\_\_\_ P.O. Box 630, Fort Wayne, IN 46801 \_\_\_\_\_  
 FESOP Permit No.: \_\_\_\_\_ F003-23815-00011 \_\_\_\_\_  
 Facility: \_\_\_\_\_ Sourcewide \_\_\_\_\_  
 Parameter: \_\_\_\_\_ CO2e Emissions \_\_\_\_\_  
 Limits: \_\_\_\_\_ The combined CO2e emissions from combusting natural gas in the eight (8) preheat charge furnaces, four (4) annealing furnaces, one (1) annealing furnace three (3) boilers, seven (7) heat treat furnaces, and two (2) hot boxes shall be less than 100,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, using the equation found in Condition D.1.3. \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	CO2 Emissions This Month (tons)	CO2 Emissions Previous 11 Months (tons)	CO2 Emissions 12 Month Total (tons)
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

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

Signature: \_\_\_\_\_

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

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

Attach a signed certification to complete this report

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Valbruna Slater Stainless, Inc  
 Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802  
 Mailing Address: P.O. Box 630, Fort Wayne, IN 46801  
 FESOP Permit No.: F003-23815-00011

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

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

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

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

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

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

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

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

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

<b>Conclusion and Recommendation</b>
--------------------------------------

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 August 4, 2014.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Doug Logan at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5328 or toll free at 1-800-451-6027 extension 4-5328.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations  
PTE Summary**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Uncontrolled Potential to Emit (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
Natural Gas Combustion (excluding 7.0 MMBtu/hr heat treat furnace)	3.34	13.35	13.35	1.05	175.65	9.66	147.54
Ingot Grinding (ID# B1)	44.53	44.53	44.53	--	--	--	--
<b>Insignificant Activities</b>							
Dry Grinding (ID# C3)	7.01E-02	3.15E-02	3.15E-02	--	--	--	--
CMI Grinder (ID# C5)	7.01E-02	3.15E-02	3.15E-02	--	--	--	--
CBM Cutoff Saw (ID# D2)	4.73	4.73	4.73	--	--	--	--
Grinding & Machining	4.51	4.51	4.51	--	--	--	--
Sawing	0.33	0.33	0.33	--	--	--	--
Dry Belt Polisher	4.63	4.63	4.63	--	--	--	--
VAR Furnaces	0.25	0.25	0.25	--	--	--	--
VAR Crucible Cleaning Station	2.95	2.54	2.54	--	--	--	--
VAR MIG Welding	6.37E-02	6.37E-02	6.37E-02	--	--	--	--
Natural Gas Combustion (7.0 MMBtu/hr heat treat furnace)	5.71E-02	0.23	0.23	1.80E-02	3.01	0.17	2.52
Degreasers	--	--	--	--	--	3.40	--
<b>Total</b>	<b>65.53</b>	<b>75.22</b>	<b>75.22</b>	<b>1.07</b>	<b>178.65</b>	<b>13.23</b>	<b>150.07</b>

\* PM2.5 listed is direct PM2.5

Potential to Emit after Control (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
Natural Gas Combustion (excluding 7.0 MMBtu/hr heat treat furnace)	3.34	13.35	13.35	1.05	175.65	9.66	147.54
Ingot Grinding (ID# B1)	11.13	11.13	11.13	--	--	--	--
<b>Insignificant Activities</b>							
Dry Grinding (ID# C3)	7.01E-02	3.15E-02	3.15E-02	--	--	--	--
CMI Grinder (ID# C5)	7.01E-04	3.15E-04	3.15E-04	--	--	--	--
CBM Cutoff Saw (ID# D2)	4.73E-02	4.73E-02	4.73E-02	--	--	--	--
Grinding & Machining	0.45	0.45	0.45	--	--	--	--
Sawing	3.31E-02	3.31E-02	3.31E-02	--	--	--	--
Dry Belt Polisher	9.26E-02	9.26E-02	9.26E-02	--	--	--	--
VAR Furnaces	2.52E-03	2.52E-03	2.52E-03	--	--	--	--
VAR Crucible Cleaning Station	2.95E-03	2.54E-03	2.54E-03	--	--	--	--
VAR MIG Welding	6.37E-04	6.37E-04	6.37E-04	--	--	--	--
Natural Gas Combustion (7.0 MMBtu/hr heat treat furnace)	5.71E-02	0.23	0.23	1.80E-02	3.01	0.17	2.52
Degreasers	--	--	--	--	--	3.40	--
<b>Total</b>	<b>15.23</b>	<b>25.37</b>	<b>25.37</b>	<b>1.07</b>	<b>178.65</b>	<b>13.23</b>	<b>150.07</b>

\* PM2.5 listed is direct PM2.5

Potential to Emit after Issuance (tons/yr)							
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO
Natural Gas Combustion (excluding 7.0 MMBtu/hr heat treat furnace)	3.34	13.35	13.35	1.05	75.00	9.66	63.00
Ingot Grinding (ID# B1)	44.53	44.53	44.53	--	--	--	--
<b>Insignificant Activities</b>							
Dry Grinding (ID# C3)	7.01E-02	3.15E-02	3.15E-02	--	--	--	--
CMI Grinder (ID# C5)	7.01E-02	3.15E-02	3.15E-02	--	--	--	--
CBM Cutoff Saw (ID# D2)	4.73	4.73	4.73	--	--	--	--
Grinding & Machining	4.51	4.51	4.51	--	--	--	--
Sawing	0.33	0.33	0.33	--	--	--	--
Dry Belt Polisher	4.63	4.63	4.63	--	--	--	--
VAR Furnaces	0.25	0.25	0.25	--	--	--	--
VAR Crucible Cleaning Station	2.95	2.54	2.54	--	--	--	--
VAR MIG Welding	6.37E-02	6.37E-02	6.37E-02	--	--	--	--
Natural Gas Combustion (7.0 MMBtu/hr heat treat furnace)	5.71E-02	0.23	0.23	1.80E-02	3.01	0.17	2.52
Degreasers	--	--	--	--	--	3.40	--
<b>Total</b>	<b>65.53</b>	<b>75.22</b>	<b>75.22</b>	<b>1.07</b>	<b>78.01</b>	<b>13.23</b>	<b>65.52</b>

\* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

**Appendix A: Emissions Calculations  
Hazardous Air Pollutant Summary**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Uncontrolled Potential to Emit (tons/yr)												
Emission Unit	Natural Gas Combustion <sup>1</sup>	Ingot Grinding	Dry Grinding	CMI Grinder	CBM Cutoff Saw	Dry Belt Polisher	VAR Furnaces.	Crucible Cleaning Station	Welding & Cutting	Natural Gas Combustion <sup>2</sup>	Degreasers	Total HAP
<b>Organic HAPs</b>												
Benzene	3.69E-03	--	--	--	--	--	--	--	--	6.31E-05	--	0.00
Dichlorobenzene	2.11E-03	--	--	--	--	--	--	--	--	3.61E-05	--	0.00
Formaldehyde	0.13	--	--	--	--	--	--	--	--	2.25E-03	--	0.13
n-Hexane	3.16	--	--	--	--	--	--	--	--	5.41E-02	--	3.22
Toluene	5.97E-03	--	--	--	--	--	--	--	--	1.02E-04	3.40E-03	9.47E-03
<b>Inorganic HAPs</b>												
Lead	8.78E-04	0.10	--	--	0.28	--	--	--	--	1.50E-05	--	3.82E-01
Cadmium	1.93E-03	--	--	--	--	--	--	--	--	3.31E-05	--	1.97E-03
Chromium	2.46E-03	3.96	0.51	0.51	0.43	0.65	4.50E-06	0.46	3.47E-03	4.21E-05	--	6.52
Manganese	6.67E-04	2.20	4.91E-02	4.91E-02	4.50E-02	4.21E-02	--	2.95E-02	1.63E-03	1.14E-05	--	2.42
Nickel	3.69E-03	0.49	0.29	0.29	0.23	0.23	2.00E-05	0.16	1.48E-03	6.31E-05	--	1.69
Arsenic	--	3.60E-03	--	3.85E-03	9.46E-03	--	--	--	--	--	--	1.69E-02
Cadmium	--	1.80E-03	--	1.75E-03	4.28E-03	--	--	--	--	--	--	7.83E-03
Selenium	--	4.50E-04	--	2.80E-04	6.75E-04	--	--	--	--	--	--	1.41E-03
<b>Total Emissions</b>	<b>3.31</b>	<b>6.76</b>	<b>0.85</b>	<b>0.85</b>	<b>0.99</b>	<b>0.93</b>	<b>2.45E-05</b>	<b>0.65</b>	<b>6.58E-03</b>	<b>5.67E-02</b>	<b>3.40E-03</b>	<b>14.41</b>

Potential to Emit after Issuance (tons/yr)												
Emission Unit	Natural Gas Combustion <sup>1</sup>	Ingot Grinding	Dry Grinding	CMI Grinder	CBM Cutoff Saw	Dry Belt Polisher	VAR Furnaces	Crucible Cleaning Station	Welding & Cutting	Natural Gas Combustion <sup>2</sup>	Degreasers	Total HAP
<b>Organic HAPs</b>												
Benzene	3.69E-03	--	--	--	--	--	--	--	--	6.31E-05	--	3.75E-03
Dichlorobenzene	2.11E-03	--	--	--	--	--	--	--	--	3.61E-05	--	2.14E-03
Formaldehyde	0.13	--	--	--	--	--	--	--	--	2.25E-03	--	0.13
n-Hexane	3.16	--	--	--	--	--	--	--	--	5.41E-02	--	3.22
Toluene	5.97E-03	--	--	--	--	--	--	--	--	1.02E-04	3.40E-03	9.47E-03
<b>Inorganic HAPs</b>												
Lead	8.78E-04	0.10	--	--	0.28	--	--	--	--	1.50E-05	--	0.38
Cadmium	1.93E-03	--	--	--	--	--	--	--	--	3.31E-05	--	1.97E-03
Chromium	2.46E-03	3.96	0.51	0.51	0.43	0.65	4.50E-06	0.46	3.47E-03	4.21E-05	--	6.52
Manganese	6.67E-04	2.20	4.91E-02	4.91E-02	4.50E-02	4.21E-02	--	2.95E-02	1.63E-03	1.14E-05	--	2.42
Nickel	3.69E-03	0.49	0.29	0.29	0.23	0.23	2.00E-05	0.16	1.48E-03	6.31E-05	--	1.69
Arsenic	--	3.60E-03	--	3.85E-03	9.46E-03	--	--	--	--	--	--	1.69E-02
Cadmium	--	1.80E-03	--	1.75E-03	4.28E-03	--	--	--	--	--	--	7.83E-03
Selenium	--	4.50E-04	--	2.80E-04	6.75E-04	--	--	--	--	--	--	1.41E-03
<b>Total Emissions</b>	<b>3.31</b>	<b>6.76</b>	<b>0.85</b>	<b>0.85</b>	<b>0.99</b>	<b>0.93</b>	<b>2.45E-05</b>	<b>0.65</b>	<b>6.58E-03</b>	<b>5.67E-02</b>	<b>3.40E-03</b>	<b>14.41</b>

Notes:

1. Excluding 7.0 MMBtu/hr heat treat furnace
2. New 7.0 MMBtu/hr heat treat furnace

**Appendix A: Emission Calculations  
Administrative Amendment Summary**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Uncontrolled Potential to Emit of New Emissions Units (tons/year)								
Emission Unit	PM	PM10	PM2.5 *	SO <sub>2</sub>	NOx	VOC	CO	Total HAPs
Heat Treat Furnace (7.0 MMBtuhr)	5.71E-02	0.23	0.23	1.80E-02	3.01	0.17	2.52	5.67E-02
Degreasers	--	--	--	--	--	3.40	--	3.40E-03
<b>Total</b>	<b>5.71E-02</b>	<b>0.23</b>	<b>0.23</b>	<b>1.80E-02</b>	<b>3.01</b>	<b>3.57</b>	<b>2.52</b>	<b>6.01E-02</b>

\* PM2.5 listed is direct PM2.5

**Appendix A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

**Natural Gas Combustion Units**

<b>Emission Unit</b>	<b>ID</b>	<b>Heat Input Capacity (MMBtu/hr)</b>
Preheat Charge Furnace	B2a	31.6
Preheat Charge Furnace	B2b	31.6
Preheat Charge Furnace	B2c	31.6
Preheat Charge Furnace	B2d	31.6
Preheat Charge Furnace	B2e	31.6
Preheat Charge Furnace	B2f	31.6
Preheat Charge Furnace	B2g	31.6
Preheat Charge Furnace	B2h	31.6
Annealing Furnace	B4a	13.0
Annealing Furnace	B4b	13.0
Annealing Furnace	B4c	13.0
Annealing Furnace	B4d	13.0
Annealing Furnace	D3	13.9
<b>Insignificant Activities</b>		
Boiler	#2	3.5
Boiler	#3	8.0
CDC Boiler		10.0
Heat Treat Furnace		9.72
Hot Box (HB1)		0.4
Hot Box (HB2)		0.4
<b>Total</b>		<b>409.0</b>

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

includes all of the units listed on page 4

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr	Limited Throughput MMCF/yr
409.0	1020	3512.9	1500

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	3.34	13.35	13.35	1.05	175.65	9.66	147.54
Limited Emission in tons/yr					75.00		63.00

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
 PM2.5 emission factor is filterable and condensable PM2.5 combined.  
 \*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
 MMBtu = 1,000,000 Btu  
 MMCF = 1,000,000 Cubic Feet of Gas  
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

Emission Factor in lb/MMcf	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	3.69E-03	2.11E-03	0.13	3.16	5.97E-03	3.31

Emission Factor in lb/MMcf	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	8.78E-04	1.93E-03	2.46E-03	6.67E-04	3.69E-03	9.63E-03
					<b>Total HAPs</b>	<b>3.31</b>
					<b>Worst HAP</b>	<b>3.16</b>

Methodology is the same as above.

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

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

**MM BTU/HR <100**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
7.0	1020	60.1

	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	5.71E-02	0.23	0.23	1.80E-02	3.01	0.17	2.52

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.  
PM2.5 emission factor is filterable and condensable PM2.5 combined.  
\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.  
MMBtu = 1,000,000 Btu  
MMCF = 1,000,000 Cubic Feet of Gas  
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu  
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**HAPS Calculations**

	HAPs - Organics					
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	Total - Organics
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	6.31E-05	3.61E-05	2.25E-03	5.41E-02	1.02E-04	<b>5.66E-02</b>

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	Total - Metals
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	1.50E-05	3.31E-05	4.21E-05	1.14E-05	6.31E-05	<b>1.65E-04</b>
	<b>Total HAPs</b>					<b>5.67E-02</b>
	<b>Worst HAP</b>					<b>5.41E-02</b>

Methodology is the same as above.

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

**Appendix A: Emission Calculations  
Primary Mill**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Capacity (tons ingot/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)		
Ingot Grinding (ID# B1)	10.27	PM	0.99	44.53	11.13	Dust Collection House	75.00%		
		PM10	0.99	44.53	11.13		75.00%		
		PM2.5	0.99	44.53	11.13		75.00%		
		SO2	0	0	0				
		NOx	0	0	0				
		VOC	0	0	0				
		CO	0	0	0				
		<b>Hazardous Air Pollutants</b>							
		chromium	8.80E-02	3.96	0.99		75.00%		
		manganese	4.90E-02	2.20	0.55		75.00%		
		nickel	9.00E-03	0.49	0.49				
		arsenic	8.00E-05	3.60E-03	3.60E-03				
		cadmium	4.00E-05	1.80E-03	1.80E-03				
selenium	1.00E-05	4.50E-04	4.50E-04						
lead	2.30E-03	0.10	0.10						

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

AP-42 and NEDS Source Classification Codes and Emission Factor Listing - PM10 do not provide emission factors for SCC # 3-03-009-12 but the source has accepted a conservative estimate of 0.99 lb/ton processed (ref. F003-23815-00011)

**Appendix A: Emission Calculations  
Insignificant Activities  
Billet Conditioning**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Capacity (tons/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)	
Dry Grinding (ID# C3)	1.6	PM	1.00E-02	7.01E-02	7.01E-02	none	0.0%	
		PM10	4.50E-03	3.15E-02	3.15E-02	none	0.0%	
		PM2.5	4.50E-03	3.15E-02	3.15E-02	none	0.0%	
		<b>Hazardous Air Pollutants</b>						
		chromium	7.30E-02	0.51	0.51	0.51	none	0.0%
		manganese	7.00E-03	4.91E-02	4.91E-02	4.91E-02	none	0.0%
nickel	4.10E-02	0.29	0.29	0.29	none	0.0%		

Process	Capacity (tons/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)	
CMI Grinder (ID# C5)	1.6	PM	1.00E-02	7.01E-02	7.01E-04	baghouse	99.00%	
		PM10	4.50E-03	3.15E-02	3.15E-04	baghouse	99.00%	
		PM2.5	4.50E-03	3.15E-02	3.15E-04	baghouse	99.00%	
		<b>Hazardous Air Pollutants</b>						
		chromium	7.30E-02	5.12E-01	5.12E-03	5.12E-03	baghouse	99.00%
		manganese	7.00E-03	4.91E-02	4.91E-04	4.91E-04	baghouse	99.00%
		nickel	4.10E-02	2.87E-01	2.87E-03	2.87E-03	baghouse	99.00%
		arsenic	5.50E-04	3.85E-03	3.85E-03	3.85E-03		
cadmium	2.50E-04	1.75E-03	1.75E-03	1.75E-03				
selenium	4.00E-05	2.80E-04	2.80E-04	2.80E-04				

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission Factor based on FIRE 6.01 SCC# 3-04-003-60

**Appendix A: Emission Calculations  
Insignificant Activities  
Continuous Bar Mill**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Capacity (tons/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)		
CBM cut-off saw (ID# D2)	5.14	PM	0.21	4.73	4.73E-02	Baghouse	99.00%		
		PM10	0.21	4.73	4.73E-02		99.00%		
		PM2.5	0.21	4.73	4.73E-02		99.00%		
		<b>Hazardous Air Pollutants</b>							
		chromium	1.90E-02	4.28E-01	4.28E-03	Baghouse	99.00%		
		manganese	2.00E-03	4.50E-02	4.50E-04	Baghouse	99.00%		
		nickel	1.00E-02	2.25E-01	2.25E-03	Baghouse	99.00%		
		arsenic	4.20E-04	9.46E-03	9.46E-03				
		cadmium	1.90E-04	4.28E-03	4.28E-03				
		selenium	3.00E-05	6.75E-04	6.75E-04				
lead	1.23E-02	2.77E-01	2.77E-01						

**Methodology**

Uncontrolled Emissions = Capacity (tons/hr)\*Emission Factor (lb/ton)\*8760hrs/yr \*1ton/2000lb

Controlled Emissions = Uncontrolled Emissions\*(1- Control Efficiency)

Emission factor from stack testing in November 1995, observed and approved by IDEM

**Appendix A: Emission Calculations  
Insignificant Activities**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Pollutant	Inlet Grain Loading (gr/dscf)	Air Flow Rate (scfm)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)
Grinding and Machining Operation	PM	0.03	4000	4.51	0.45	baghouse	90.00%
	PM10	0.03	4000	4.51	0.45	baghouse	90.00%
	PM2.5	0.03	4000	4.51	0.45	baghouse	90.00%

Process	Pollutant	Inlet Grain Loading (gr/dscf)	Air Flow Rate (scfm)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)
Sawing Operation	PM	0.003	2942	0.33	0.03	baghouse	90.00%
	PM10	0.003	2942	0.33	0.03	baghouse	90.00%
	PM2.5	0.003	2942	0.33	0.03	baghouse	90.00%

**Methodology**

Uncontrolled Emissions (tons/yr) = Controlled Emissions (tons/yr) / (1 - Control Efficiency (%))

Controlled Emissions (tons/yr) = Grain Loading (gr/dscf) \* Air Flow Rate (scfm) \* 60 (min/hr) \* 1/7,000 (lb/gr) \* 8,760 (hr/yr) \* 1/2,000 (ton/lb)

**Appendix A: Emission Calculations  
Insignificant Activities**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Capacity (tons/hr)	Pollutant	Emission Factor (lb/ton produced)	Uncontrolled PTE (tons/yr)	Controlled Emissions (tons/yr)	Type of Control	Control Efficiency (%)	
Dry Belt Polisher	2.64	PM*	4.00E-01	4.63	0.093	baghouse	98.00%	
		PM10*	4.00E-01	4.63	0.093	baghouse	98.00%	
		PM2.5*	4.00E-01	4.63	0.093	baghouse	98.00%	
		<b>Hazardous Air Pollutants</b>						
		Chromium**	5.64E-02	0.65	0.013	baghouse	98.00%	
		Manganese**	3.64E-03	0.04	0.001	baghouse	98.00%	
Nickel**	2.00E-02	0.23	0.005	baghouse	98.00%			

**Methodology**

No AP-42 emission factor available for stainless steel polishing, therefore; the emission factors were provided by source (0.3636 lb/ton).

\*Abrasive from polishing belt will contribute an additional 10% of PM/PM10/PM2.5.  $0.3636 * 10\% + 0.3636 = 0.39996$  lb/ton

Uncontrolled (ton/yr) = Rate (tons/hr) \* Ef (lb/ton) \* 8,760 (hr/yr) \* 1/2,000 (ton/hr)

Controlled (ton/yr) = Uncontrolled (ton/yr) \* (1- % Control Efficiency)

According to source, 15-5 PH Stainless Steel contains 15.5% Chromium, 5.5% Nickel, and 1.00% Manganese. The polishing belts do not contribute any additional metal HAPs.

\*Metal HAPs emission factors (lb/ton) = 0.3636 (lb/ton) \* % Metal HAP

**Appendix A: Emission Calculations  
Vacuum Arc Remelting Furnaces**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Process	Uncontrolled Particulate Emissions (lb/hr)	Uncontrolled Particulate Emissions (ton/yr)	Controlled Particulate Emissions (lb/hr)	Controlled Particulate Emissions (ton/yr)	Uncontrolled Chromium (tons/yr)	Uncontrolled Nickel (tons/yr)	Controlled Chromium (tons/yr)	Controlled Nickel (tons/yr)
Vacuum Arc Remelting Furnaces (VAR1 & VAR2)	0.058	0.25	0.0006	0.0025	4.50E-06	2.00E-05	4.55E-08	2.02E-07

**Methodology**

\* Emission data for the VAR-Vacuum exhausts were provided by the source.  
 Uncontrolled Emissions = (Amount collected lbs/hr)/Control Efficiency = lb/hr  
 Controlled Emissions = (Uncontrolled emission rate lbs/hr) x (1-control efficiency) = lb/hr  
 Assumes 99% control efficiency

**Appendix A: Emission Calculations  
Vacuum Arc Remelting Process  
Crucible Cleaning Station**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Controlled emissions from a 24" crucible = 4.00 lbs PM / crucible  
 Max. Number of Crucibles per day = 4  
 Controlled emissions = 4 lbs x 4 crucibles = 16 lbs/day  
 Uncontrolled emissions = (4 lbs x 4 crucibles)/24 hr = (16 lbs/24 hrs)/99% = 0.673 lb/hr  
 Annual uncontrolled = uncontrolled emissions lb/hr x 8760hrs/yr x ton/2000 lb = 2.95 tons/yr

**Table 1 - Emission Factors for Abrasives**

Abrasive	Emission Factor (EF)	
	lb PM / lb abrasive	lb PM10 / lb PM
Steel Shot	0.004	0.86

Potential to Emit Before Control			
EF = PM emission factor for actual abrasive from Table 1 =	0.004	lb PM/ lb abrasive	
PM10 emission factor ratio for actual abrasive from Table 1 =	0.86	lb PM10 / lb PM	
	<b>PM</b>	<b>PM10</b>	<b>Units</b>
<b>Potential to Emit (before control) =</b>	<b>0.673</b>	<b>5.791E-01</b>	<b>lb/hr</b>
=	<b>16.16</b>	<b>13.90</b>	<b>lb/day</b>
=	<b>2.95</b>	<b>2.54</b>	<b>ton/yr</b>

Potential to Emit After Control			
	<b>PM</b>	<b>PM10</b>	<b>Units</b>
<b>Emission Control Device Efficiency =</b>	<b>99.9%</b>	<b>99.9%</b>	<b>Units</b>
<b>Potential to Emit (after control) =</b>	<b>6.7E-04</b>	<b>5.8E-04</b>	<b>lb/hr</b>
=	<b>1.616E-02</b>	<b>1.390E-02</b>	<b>lb/day</b>
=	<b>2.949E-03</b>	<b>2.537E-03</b>	<b>ton/yr</b>

Potential to Emit (before control)					
	<b>HAP Composition</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>	<b>Units</b>
		15.50%	1.00%	5.50%	
=		0.104	0.007	0.037	lb/hr
=		2.505	0.162	0.889	lb/day
=		0.457	0.029	0.162	ton/yr

Highest single HAP = Chromium = 0.457 tons/yr      Total HAPS (PTE) = 0.649

Potential to Emit (after Control)					
	<b>HAP Composition</b>	<b>Chromium</b>	<b>Manganese</b>	<b>Nickel</b>	<b>Units</b>
		15.50%	1.00%	5.50%	
=		1.0E-04	6.7E-06	3.7E-05	lb/hr
=		2.5E-03	1.6E-04	8.9E-04	lb/day
=		4.6E-04	2.9E-05	1.6E-04	ton/yr

**METHODOLOGY**

Emission Factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)  
 Controlled emission Rate (tons/year) = [Uncontrolled Emission Rate (lb/hour)] x [8760 hours/year] x [ton/2000 lb]  
 Controlled Emission Rate(lb/hr) = [Uncontrolled Emission Rate (lb/hour)] \* [1 - control efficiency]  
 Uncontrolled Emission Rate = (Amount collected lb/hr)/Control Efficiency = lb/hr

Emission data provided by source. Data from identical VAR process at another site.  
 Source will be processing 15-5 stainless in the VAR crucible cleaning station. Steel shot of the following percent composition will be used. Percentages provided by the shot manufacturer : 1% Mn, 15.50% Cr, 5.50% Nickel.

**Appendix A: Emission Calculations  
Welding and Thermal Cutting**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

Welding wire / year = 13140 lb wire/yr  
 Maximum Potential Throughput (wire)= 6.57 tons wire/year  
 Max. Electrode Consumption/hour = 1.5 lbs wire/hr

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS*				UNCONTROLLED EMISSIONS				HAPS (lbs/hr)	CONTROLLED EMISSIONS				HAPS (lbs/hr)	
			(lb pollutant/lb electrode)				(lbs/hr)					(lbs/hr)					
			PM=PM10=PM2.5	Mn	Ni	Cr	PM=PM10=PM2.5	Mn	Ni	Cr		PM=PM10=PM2.5	Mn	Ni	Cr		
WELDING																	
Metal Inert Gas (MIG)(carbon steel)	1	1.5	0.0032	0.000245	0.000226	0.000528	0.005	0.0004	0.0003	0.000792	0.001	4.8E-5	3.7E-6	3.4E-6	7.9E-6	1.5E-5	
	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS				EMISSIONS				HAPS (lbs/hr)	EMISSIONS				HAPS (lbs/hr)
				(lb pollutant/1,000 inches cut, 1" thick)**				(lbs/hr)					(lbs/hr)				
				PM=PM10=PM2.5	Mn	Ni	Cr	PM=PM10=PM2.5	Mn	Ni	Cr		PM=PM10=PM2.5	Mn	Ni	Cr	
Oxyacetylene	1	1	1	0.1622	0.0005	0.0001	0.0003	0.010	4.9E-6	4.9E-10	1.5E-13	4.9E-6	9.7E-5	4.9E-8	4.9E-12	1.5E-15	4.9E-8
<b>EMISSION TOTALS</b>																	
Potential Emissions lbs/hr								0.015	0.0004	0.0003	0.0008	0.002	1.5E-4	3.7E-6	3.4E-6	7.9E-6	1.5E-5
Potential Emissions lbs/day								0.349	0.0089	0.0081	0.0190	0.036	0.0035	0.0001	0.0001	0.0002	3.6E-4
Potential Emissions tons/year								0.064	0.0016	0.0015	0.0035	0.007	6.4E-4	1.6E-5	1.5E-5	3.5E-5	6.6E-5

**METHODOLOGY**

Maximum Throughput = (welds/day) x (Wt. of Wire/weld) x (365 days/year)

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

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

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

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000

Emission data provided by source.

**Appendix A: Emissions Calculations  
Insignificant Degreaser**

**Company Name:** Valbruna Slater Stainless, Inc.  
**Address City IN Zip:** 2400 Taylor Street West, Fort Wayne, IN 46802  
**AA No.:** 003-34799-00011  
**Reviewer:** Doug Logan  
**Date:** 9/26/2014

In order for the degreaser to qualify as an insignificant activity under the listing in 326 IAC 2-7-1(21)(J)(vi)(DD), the source shall use solvents "the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months".

The source provided an MSDS for Safety-Kleen Premium Solvent, product codes 6605 and 6616, the following PTE is based on the following conservative estimates:

The solvent has a maximum density of 6.7 lb/gal.  
 The solvent used in the degreaser contains 100% VOC and up to 0.1% HAP (toluene)  
 HAP content from Table 3 to Subpart Mmmm of Part 63, CASRN 64742-47-8.

**Uncontrolled Potential Emissions (per each degreaser)**

6.7	lb/gal x	100	% VOC x	145	gal/yr ÷	2000	lb/ton =	0.49	tons VOC per year
				0.49	tpy VOC x	0.1	% HAP =	4.86E-04	tons HAP per year
<b>Total for</b>	<b>7</b>	<b>units</b>	x		0.49 tons VOC/yr per unit =		<b>3.40</b>	<b>tons VOC/yr</b>	
			x		4.86E-04 tons HAP/yr per unit =		<b>3.40E-03</b>	<b>tons HAP/yr (toluene)</b>	



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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**Michael R. Pence**  
*Governor*

**Thomas W. Easterly**  
*Commissioner*

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Jonathan Hacker  
Valbruna Slater Stainless, Inc.  
2400 Taylor Street W  
Fort Wayne, IN 46801

DATE: October 3, 2014

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

SUBJECT: Final Decision  
Administrative Amendment  
003-34799-00011

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:  
Tiziano Briozzo – General Manager  
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 6/13/2013

# Mail Code 61-53

IDEM Staff	GHOTOPP 10/3/2014 Valbruna Slater Stainless, Inc 003-34799-00011 Final		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Jonathan Hacker Valbruna Slater Stainless, Inc 2400 Taylor St W Fort Wayne IN 46801 (Source CAATS) via confirmed delivery										
2		Tiziano Briozzo General Manager Valbruna Slater Stainless, Inc 2400 Taylor St W Fort Wayne IN 46801 (RO CAATS)										
3		Daniel & Sandy Trimmer 15021 Yellow River Road Columbia City IN 46725 (Affected Party)										
4		Duane & Deborah Clark Clark Farms 6973 E. 500 S. Columbia City IN 46725 (Affected Party)										
5		The Traxmor Family 745 Talor St Fort Wayne IN 46802 (Affected Party)										
6		Mr. Howard Traxmor 745 Taylor St Fort Wayne IN 46802 (Affected Party)										
7		Fort Wayne City Council and Mayors Office 200 E Berry Street Ste 120 Fort Wayne IN 46802 (Local Official)										
8		Mr. Jeff Coburn Plumbers & Steamfitters, Local 166 2930 W Ludwig Rd Fort Wayne IN 46818-1328 (Affected Party)										
9		Allen Co. Board of Commissioners 200 E Berry Street Ste 410 Fort Wayne IN 46802 (Local Official)										
10		Fort Wayne-Allen County Health Department 200 E Berry St Suite 360 Fort Wayne IN 46802 (Health Department)										
11												
12												
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