



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for Magnetics International Inc. in Porter County

Part 70 Operating Permit Renewal No.: T127-35710-00039

The Indiana Department of Environmental Management (IDEM) has received an application from Magnetics International Inc. located at 1111 N. State Rd. 149, Burns Harbor, IN 46304 for a renewal of its Part 70 Operating Permit issued on January 14, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Magnetics International Inc. to continue to operate its existing source.

This draft renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Westchester Public Library
200 West Indiana Avenue
Chesterton, IN 46304

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T127-35710-00039 in all correspondence.

Comments should be sent to:

Monica Dick
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-1243
Or dial directly: (317) 234-1243
Fax: (317) 232-6749 attn: Monica Dick
E-mail: mdick@idem.IN.gov

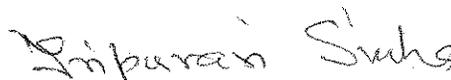
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

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>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Monica Dick of my staff at the above address.


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



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Michael R. Pence
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Carol S. Comer
Commissioner

Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

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

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

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

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

Operation Permit No.: T127-35710-00039	
Issued by:	Issuance Date:
Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Expiration Date:

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

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

Source Address:	1111 North State Road 149, Burns Harbor, Indiana 46304
General Source Phone Number:	219-763-1199
SIC Code:	2819 Industrial Inorganic Chemicals, NEC
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

This is an existing affected source under 40 CFR 63, Subpart CCC and consists of the following emission units and pollution control devices:

- (a) Two (2) Process Lines, installed in 1990 consisting of:
 - (1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers collector scrubbers operated in series. This system exhausts through the stack identified as S-1. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
 - (2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-2. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
- (b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons, each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks S-4 and S-5

respectively.

- (c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks, each tank has a capacity to store 31,150 gallons of either hydrochloric acid solution or non-HAP/non-VOC product. As a maximum capacity twelve (12) tanks store a hydrochloric acid solution and four (4) tanks store a non-HAP/non-VOC production. Each tank is attached to a common vent header, connected to a fume scrubber to control vapor loss and exhausts through a stack, identified as S-3.
- (d) One (1) HCl loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (e) One (1) Enrichment Facility, consisting of:
 - (1) One (1) processing tank with HCl emissions controlled by an acid fume scrubber and exhausts through stack EP002.
 - (2) One (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001.
- (f) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.
- (g) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.
- (h) One Iron Oxide Mill Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 127-35710-00039, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to 127-35710-00039 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-

- 5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if,

subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of

326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. 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 2-7-5][326 IAC 2-7-6]

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

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5][326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue

MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. 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 Part 70 permit.

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 2-7-5(3)(C)][326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(b) The address for report submittal is:

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

Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

This is an existing affected source under 40 CFR 63, Subpart CCC and consists of the following emission units and pollution control devices:

- (a) Two (2) Process Lines, installed in 1990 consisting of:
 - (1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers collector scrubbers operated in series. This system exhausts through the stack identified as S-1. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
 - (2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-2. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
- (b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons, each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks S-4 and S-5 respectively.
- (e) One (1) Enrichment Facility, consisting of:
 - (2) One (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) from the iron oxide production facility shall not exceed the following PM limits as specified below. The pound per hour limitation was calculated with the following equation:

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

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

- (a) At a process weight rate of 12 tons per hour for Roaster A Process Line, the allowable PM emission rate shall not exceed 21.7 pounds per hour.

- (b) At a process weight rate of 12 tons per hour for Roaster B Process Line the allowable PM emission rate shall not exceed 21.7 pounds per hour.
- (c) At a process weight rate of 1.8 tons per hour for each storage bin, the allowable PM emission rate shall not exceed 6.03 pounds per hour.

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

Pursuant to 326 IAC 6-2-4(a) (Particulate Emission Limitations for Sources of Indirect Heating), for Q less than 10 MM/Btu, the allowable particulate matter (PM) emissions from the Boiler shall not exceed 0.6 pounds of PM per million British thermal units.

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

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

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

D.1.4 Particulate Control [326 IAC 2-3] [326 IAC 2-7-6(1)]

In order for the control device to be an integral control, emissions from Roaster A and Roaster B shall be controlled by one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers collector scrubbers operated in series at all times that these units are in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or a voluntary indoor dust collector which vents indoors.
- (g) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or a voluntary indoor dust collector which vents indoors.
- (h) One Iron Oxide Mill Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or a voluntary indoor dust collector which vents indoors.

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

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

D.2. 1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate matter (PM) from the three packaging units, P-1, P-2, and P-3 shall not exceed 13.6 pounds per hour when operating at a process weight rate of 6.0 tons per hour.

The pound per hour limitation was calculated with the following equation:

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

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

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

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

SECTION E.1

NESHAP

Emissions Unit Description:

This is an existing affected source under 40 CFR 63, Subpart CCC and consists of the following emission units and pollution control devices:

- (a) Two (2) Process Lines, installed in 1990 consisting of:
 - (1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers collector scrubbers operated in series. This system exhausts through the stack identified as S-1. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
 - (2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-2. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
- (c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks, each tank has a capacity to store 31,150 gallons of either hydrochloric acid solution or non-HAP/non-VOC product. As a maximum capacity twelve (12) tanks store a hydrochloric acid solution and four (4) tanks store a non-HAP/non-VOC production. Each tank is attached to a common vent header, connected to a fume scrubber to control vapor loss and exhausts through a stack, identified as S-3.
- (d) One (1) HCl loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (e) One (1) Enrichment Facility, consisting of:
 - (1) One (1) processing tank with HCl emissions controlled by an acid fume scrubber and exhausts through stack EP002.

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

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

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

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCC.

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

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

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

The Permittee shall comply with the provisions 40 CFR Part 63, Subpart CCC (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 20-29, for the emission units listed above:

- (1) 40 CFR 63.1155
- (2) 40 CFR 63.1156
- (3) 40 CFR 63.1157
- (4) 40 CFR 63.1159
- (5) 40 CFR 63.1160
- (6) 40 CFR 63.1161
- (7) 40 CFR 63.1162
- (8) 40 CFR 63.1163
- (9) 40 CFR 63.1164
- (10) 40 CFR 63.1165
- (11) 40 CFR 63.1166
- (12) Table 1

E.1.3 Testing Requirements [326 IAC 2-1.1-11][40 CFR 63, Subpart CCC][326 IAC 20-29]

In order to demonstrate compliance with Condition E.1.2, the Permittee shall perform HCl testing of the control device for Roasters A and B utilizing methods as approved by the Commissioner and at least once every year or pursuant to 40 CFR 63.1162, according to an alternative schedule that is approved by IDEM, from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

Source Name: Magnetics International Inc.
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
Part 70 Permit No.: 127-35710-00039

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Magnetics International Inc.
Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
Part 70 Permit No.: 127-35710-00039

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Source Name: Magnetics International Inc.
 Source Address: 1111 North State Road 149, Burns Harbor, Indiana 46304
 Part 70 Permit No.: 127-35710-00039

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Magnetics International Inc.
Source Location:	1111 N. State Rd. 149, Burns Harbor, IN 46304
County:	Porter
SIC Code:	2819 Industrial Inorganic Chemicals, NEC
Permit Renewal No.:	T127-35710-00039
Permit Reviewer:	Monica Dick

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Magnetics International, Inc. relating to the operation of a stationary iron oxide and hydrochloric acid production facility. On April 14, 2015, Magnetics International Inc. submitted an application to the OAQ requesting to renew its operating permit. Magnetics International Inc. was issued its first Part 70 Operating Permit Renewal T127-28796-00039 on January 14, 2011.

Permitted Emission Units and Pollution Control Equipment

This is an existing affected source under 40 CFR 63, Subpart CCC and consists of the following emission units and pollution control devices:

- (a) Two (2) Process Lines, installed in 1990 consisting of:
 - (1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-1. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
 - (2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-2. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
- (b) Two (2) iron oxide storage bins, identified as Bin A and Bin B, with a process weight rate of 1.8 tons per hour each, with a storage capacity of 100 tons, each. Each bin is equipped with a baghouse to capture dust and exhaust through stacks S-4 and S-5 respectively.
- (c) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks, each tank has a capacity to store 31,150 gallons of either hydrochloric acid solution or non-HAP/non-VOC product. As a maximum capacity twelve (12) tanks store a hydrochloric

acid solution and four (4) tanks store a non-HAP/non-VOC production. Each tank is attached to a common vent header, connected to a fume scrubber to control vapor loss and exhausts through a stack, identified as S-3.

- (d) One (1) loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (e) One (1) Enrichment Facility, consisting of:
 - (1) One (1) processing tank with emissions controlled by an acid fume scrubber and exhausts through stack EP002.
 - (2) One (1) 4 MMBtu/hr natural gas boiler, constructed in 1994, exhausting through stack EP001.
- (f) One Iron Oxide Packaging Unit, constructed in 1991, identified as P-1, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.
- (g) One Iron Oxide Mill Packaging Unit, constructed in 1996, identified as P-2, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.
- (h) One Iron Oxide Mill Unit, constructed in 1996, identified as P-3, with a maximum capacity of 30,000 tons per year, venting to S-4, S-5 and/or an indoor dust collector which vents indoors.

Emission Units and Pollution Control Equipment Constructed and/or Operated without a Permit

There are no emission units or pollution control equipment constructed and/or operated without a permit.

Emission Units and Pollution Control Equipment Removed From the Source

There are no emission units or pollution control equipment removed from the source.

Insignificant Activities

There are no insignificant activities at the source.

Existing Approvals

Since the issuance of the Part 70 Operating Permit 127-28796-00039 on January 14, 2011, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Permit Modification No. 127-30573-00039, issued on November 3, 2011.
- (b) Significant Source Modification No. 127-30819-00039, issued on February 9, 2012.
- (c) Significant Permit Modification No. 127-30893-00039, issued on March 23, 2012.

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

Air Pollution Control Justification as an Integral Part of the Process

The applicant has submitted the following justification such that the: venturi scrubber and separator; and, packed bed water scrubbers be considered as an integral part of the two (2) iron oxide and hydrochloric acid production lines:

- (a) The venturi and separator serves a primary purpose other than pollution control.
- (b) The equipment has an overwhelming positive net economic effect.
- (c) The Water Scrubbers serve a primary purpose other than pollution control.
- (d) The process cannot operate without the equipment.

IDEM, OAQ has evaluated the justifications and agreed that the venturi, separator and packed bed scrubbers, will be considered as an integral part of the two (2) iron oxide and hydrochloric acid production lines. Therefore, the permitting level will be determined using the potential to emit for HCl, PM, PM10, PM2.5 after the packed bed scrubbers. An operating condition in the proposed permit will specify that this venturi, separator and packed bed scrubbers shall operate at all times when the two (2) iron oxide and hydrochloric acid production lines are in operation. This initial determination has been made under this Part 70 Operating Permit Renewal No. T127-35710-00039. See Appendix B of this document for detailed review of the air pollution control justification as an integral part of the process.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Porter County:

Pollutant	Designation
SO ₂	Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	On June 11, 2012, the U.S. EPA designated Porter County nonattainment, for the 8-hour ozone standard.
PM _{2.5}	Unclassifiable or attainment effective February 6, 2012, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
<p>¹Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area, including Porter County, for the 1-hour standard which was revoked effective June 15, 2005. The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Porter County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.</p> <p>²The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.</p>	

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Porter County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) **PM_{2.5}**
 Porter County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Porter County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	53.9
PM ₁₀	67.7
PM _{2.5}	67.7
SO ₂	0.2
NO _x	14.3
VOC	1.5
CO	22.8
Single HAP	47.3
Total HAP	47.6

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) 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) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀ and PM_{2.5} is less than 100 tons per year.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of single HAP and combined HAPs is less than 10 and 25 tons per year.

However, the source has opted to be a TV source.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2014 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	1
SO ₂	0
NO _x	14
VOC	1
CO	12

Part 70 Permit Conditions

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

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

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Roaster A & Roaster B	12.53	12.53	12.53	-	-	-	-	4.76	4.73
Burners for Roaster A & B	0.49	1.96	1.96	0.15	12.88	1.42	21.64	0.49	0.46
Storage Bins A & B	8.76	21.02	21.02	-	-	-	-	-	-
HCl Storage and Loading	-	-	-	-	-	-	-	1.19	1.19
FeO Packaging and Milling	8.0	8.0	8.0	-	-	-	-	-	-
Enrichment Facility Boiler	0.03	0.11	0.11	0.01	1.44	0.08	1.21	0.03	0.03
Enrichment Facility Process Tank	-	-	-	-	-	-	-	0.81	0.81
Total PTE of Entire Source	29.75	43.57	43.57	0.16	14.32	1.50	22.85	7.26	6.72
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	-	250	NA	NA
Emission Offset Thresholds	-	-	-	-	100	100	-	NA	NA
* 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 _{2.5} listed is direct PM _{2.5} .									

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) 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.

Since the controls for the hydrochloric acid regeneration plant are considered integral to the process the PTE of the existing source has been revised. The PTE table includes the revised PTE.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (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). Therefore, the PSD Minor Limits from the permit have been removed.
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.

Since the controls for the Roasters A and B are considered integral to the process, the PTE of the existing source has been revised. The PTE table includes the revised PTE, which demonstrates emissions are less than major source for Emission Offset. Therefore the minor Emission Offset limits have been removed.

- (c) These emissions are based upon TSD Appendix A.
- (d) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source for Clean Air Act, Section 112.

Federal Rule Applicability

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

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the roasters, identified as Roaster A and Roaster B for PM10 and PM2.5 emissions, since the venturi, separator, absorber, and packed towers are inherent process equipment. The determination made for integral determination also satisfies the criteria for an inherent determination.

Therefore, the emissions from the roasters, identified as Roaster A and Roaster B are each less than the major source threshold.

All other emissions units have a potential to emit less than major source threshold.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) The emission units associated with the hydrochloric acid regeneration plant are still subject to the National Emission Standards for Hazardous Air Pollutants for National

Emission Standards for Hazardous Air Pollutants for Steel Pickling—HCl Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC), which is incorporated by reference as 326 IAC 20-29. The compliance date for the emission units was June 22, 2001. IDEM has calculated the source to be a minor source of HAPs. However, this source is still subject to the standard as once in always in source. The emission units associated with the hydrochloric acid regeneration plant including the emission units listed below are part of an existing hydrochloric acid regeneration plant. The emission units subject to this rule include the following:

- (A) Two (2) Process Lines, installed in 1990 consisting of:
 - (1) Roaster A - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-1, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-1. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
 - (2) Roaster B - an iron oxide and hydrochloric acid production system with a maximum processing rate of 12 tons per hour of ferrous chloride solution. This system consists of one (1) natural gas-fired spray roaster, identified as R-2, utilizing tangential firing and four (4) low-NO_x burners rated at 7.5 MMBtu/hr each, with a maximum heat input rate of 30 MMBtu/hr total; equipped with one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed tower collector scrubbers operated in series. This system exhausts through the stack identified as S-2. The one (1) venturi; one (1) separator; one (1) absorber; and two (2) packed towers are integral to the process.
- (C) One (1) tank farm identified as T-6, consisting of sixteen (16) storage tanks, each tank has a capacity to store 31,150 gallons of either hydrochloric acid solution or non-HAP/non-VOC product. As a maximum capacity twelve (12) tanks store a hydrochloric acid solution and four (4) tanks store a non-HAP/non-VOC production. Each tank is attached to a common vent header, connected to a fume scrubber to control vapor loss and exhausts through a stack, identified as S-3.
- (D) One (1) HCl loading and unloading station with emissions controlled by fume scrubber exhausting through stack, S-3
- (E) One (1) Enrichment Facility, consisting of:
 - (1) One (1) processing tank with HCl emissions controlled by an acid fume scrubber and exhausts through stack EP002.

The emission units listed above are subject to the following portions of 40 CFR 63, Subpart CCC:

- (1) 40 CFR 63.1155
- (2) 40 CFR 63.1156
- (3) 40 CFR 63.1157
- (4) 40 CFR 63.1159

- (5) 40 CFR 63.1160
- (6) 40 CFR 63.1161
- (7) 40 CFR 63.1162
- (8) 40 CFR 63.1163
- (9) 40 CFR 63.1164
- (10) 40 CFR 63.1165
- (11) 40 CFR 63.1166
- (12) Table 1

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

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is permitted as a Part 70 Operating Permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and NO_x is less than 25 tons per year; therefore, pursuant to 326 IAC 2-6-3(a)(2), an emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1 and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1).

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6.8 PM Limitation for Lake County

This source is not subject to 326 IAC 6.5 because it is not located in Lake County.

326 IAC 6-4 (Fugitive Dust Emission Limitations)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is not subject to the requirements of 326 IAC 6-5 because the amounts of fugitive particulate matter emissions from fugitive sources are less than 25 tons per year.

State Rule Applicability – Individual Facilities

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

All emission units were constructed before 1997, the applicability date of this rule. Therefore, the requirement of 326 IAC 2-4.1 does not apply to any emission unit.

326 IAC 6-2-4 (Particulate Emissions Limitations for Indirect Heating Facilities)

The enrichment facility boiler is subject to 326 IAC 6-2-4 (Particulate Emissions for Sources of indirect Heating) because the boiler was constructed in 1994.

Pursuant to this rule, the particulate matter emissions from enrichment facility boiler shall be limited as follows:

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

Where:

Pt = Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input; and
Q = Total source maximum operating capacity (MMBtu/hr).

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

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

Pursuant to 326 IAC 6-3-2, the allowable particulate matter (PM) from the magnetic powder production and packaging facilities shall not exceed the following PM limits as specified below. The pound per hour limitation was calculated with the following equation:

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

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

- (a) At a process weight rate of 12 tons per hour for Roaster A Process Line, the allowable PM emission rate shall not exceed 21.7 pounds per hour.
- (b) At a process weight rate of 12 tons per hour for Roaster B Process Line the allowable PM emission rate shall not exceed 21.7 pounds per hour.
- (c) At a process weight rate of 1.8 tons per hour for each storage bin, the allowable PM emission rate shall not exceed 6.03 pounds per hour.
- (d) At a process weight rate of 6 tons per hour for each packaging unit, P-1, P-2, and P-3, the allowable PM emission rate shall each not exceed 13.6 pounds per hour.

Roaster A, Roaster B, Storage Bin A, Storage Bin B, Packaging Unit P-1, Mill Packaging Unit P-2, and Mill Unit P-3 can each comply with the limit.

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The burners for Roasters A and B and the enrichment facility boiler are not subject to 326 IAC 326 IAC 7-1.1 because its SO₂ PTE is less than 25 tons/year or 10 pounds/hour.

Compliance Determination and Monitoring Requirements

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

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

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

(a) Testing Requirements

- (1) The PM/PM10 testing requirements for Roasters A and B have been removed because the integral control efficiency required to comply with PSD Limits are very low.
- (2) The PM/PM10/PM2.5 testing requirements for Storage Bins A and B have been removed from the permit, because the controls have not been included for complying with any limits.

This is a revision since the previous renewal.

(b) Control Device Monitoring

The PM/PM10/PM2 compliance monitoring requirements for the Roasters A and B, Storage Bins A and B, and Packaging and Milling have been removed from the permit, because of the following:

- (a) integral control efficiency needed for Roasters A and B is low;
- (b) the control devices have been tested several times; and
- (c) the control devices will be monitored continuously as per the NESHAP requirements.

The Compliance and Enforcement Branch's Section Chief Dave Cline has agreed to not test. There is no need to have duplicate testing.

The control device monitoring for the storage bins has been removed because these are voluntary controls.

This is a revision since the previous renewal.

Recommendation

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

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

An application for the purposes of this review was received on April 14, 2015.

Conclusion

The operation of this stationary iron oxide and hydrochloric acid production facility shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 127-35710-00039.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick 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) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (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: Emissions Calculations
Emission Summary**

Source Name: Magnetix International Inc.
Source Location: 1111 North SR 149, Burns Harbor, IN 46304
Permit Number: T127-35710-00039
Reviewer: Monica Dick

Unrestricted Potential to Emit without Integral Controls										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	HAPs		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	Worst Case	Single	Combined
Roaster A & Roaster B	125.27	125.27	125.27	-	-	-	-	HCl	47.30	47.59
Burners for Roasters A & B	0.49	1.96	1.96	0.15	12.88	1.42	21.64	Hexane	0.46	0.49
Storage Bins A & B	8.76	21.02	21.02	-	-	-	-	-	-	-
HCL Storage and Loading	-	-	-	-	-	-	-	HCl	1.19	1.19
FeO Packaging and Milling	32.11	32.11	32.11	-	-	-	-	-	-	-
Enrichment Facility Boiler	0.03	0.11	0.11	0.01	1.44	0.08	1.21	Hexane	0.03	0.03
Enrichment Facility Process Tank	-	-	-	-	-	-	-	HCl	0.81	0.81
Total Emissions	166.66	180.47	180.47	0.16	14.32	1.50	22.85	HCl	47.30	47.59

Unrestricted Potential to Emit with Integral Controls										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	HAPs		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	Worst Case	Single	Combined
Roaster A & Roaster B	12.53	12.53	12.53	-	-	-	-	HCl	4.73	4.76
Burners for Roasters A & B	0.49	1.96	1.96	0.15	12.88	1.42	21.64	Hexane	0.46	0.49
Storage Bins A & B	8.76	21.02	21.02	-	-	-	-	-	-	-
HCL Storage and Loading	-	-	-	-	-	-	-	HCl	1.19	1.19
FeO Packaging and Milling	32.11	32.11	32.11	-	-	-	-	-	-	-
Enrichment Facility Boiler	0.03	0.11	0.11	0.01	1.44	0.08	1.21	Hexane	0.03	0.03
Enrichment Facility Process Tank	-	-	-	-	-	-	-	HCl	0.81	0.81
Total Emissions	53.91	67.73	67.73	0.16	14.32	1.50	22.85	HCl	6.72	7.26

Limited Potential to Emit										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	HAPs* (tons/yr)		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	Worst Case	Single	Combined
Roaster A & Roaster B	12.53	12.53	12.53	-	-	-	-	HCl*	9.47	13.81
Burners for Roasters A & B	0.49	1.96	1.96	0.15	12.88	1.42	21.64	Hexane	0.46	0.49
Storage Bins A & B	8.76	21.02	21.02	-	-	-	-	-	-	-
HCL Storage and Loading	-	-	-	-	-	-	-	HCl*	1.19	1.19
FeO Packaging and Milling	32.1	32.1	32.1	-	-	-	-	-	-	-
Enrichment Facility Boiler	0.03	0.11	0.11	0.01	1.44	0.08	1.21	Hexane	0.03	0.03
Enrichment Facility Process Tank	-	-	-	-	-	-	-	HCl*	0.81	0.81
Total Emissions	53.91	67.73	67.73	0.16	14.32	1.50	22.85	HCl*	11.46	16.31

* Pursuant to 40 CFR 63.1157(b) HCl is limited to 25 ppmv and Cl is limited to 6ppmv from the collection of equipment and processes of an affected plant.

Controlled after Integral Controls										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	HAPs		
	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	(tons/yr)	Worst Case	Single	Combined
Roaster A & Roaster B	12.53	12.53	12.53	-	-	-	-	HCl	4.73	4.76
Burners for Roasters A & B	0.49	1.96	1.96	0.15	12.88	1.42	21.64	Hexane	0.46	0.49
Storage Bins A & B	0.44	1.05	1.05	-	-	-	-	-	-	-
HCL Storage and Loading	-	-	-	-	-	-	-	HCl	0.06	0.06
FeO Packaging and Milling	0.32	0.32	0.32	-	-	-	-	-	-	-
Enrichment Facility Boiler	0.03	0.11	0.11	0.01	1.44	0.08	1.21	Hexane	0.03	0.03
Enrichment Facility Process Tank	-	-	-	-	-	-	-	HCl	0.04	0.04
Total Emissions	13.80	15.97	15.97	0.16	14.32	1.50	22.85	HCl	4.83	5.37

Appendix A: Emissions Calculations
Roaster A and B Controlled by One Absorber and Two Water Scrubbers in Series
Roasters A & B

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Unrestricted Potential Emissions without Integral Controls (calculated)					
	Roaster A		Roaster B		Total Emissions (TPY)
	Emissions (lb/hr)	Emissions (TPY)	Emissions (lb/hr)	Emissions (TPY)	
PM/PM10/PM2.5	14.30	62.63	14.30	62.63	125.27
HCl	5.40	23.65	5.40	23.65	47.30
Total HAPs	5.43	23.80	5.43	23.80	47.59

Unrestricted Potential Emissions without Integral Controls (TPY) =
5/28/14 stack test results (lb/hr) * 1/(1 - 0.90) * conversion (8760 hr/yr) * conversion (1 ton/2000 lbs)

Unrestricted Potential Emissions with Integral Controls					
	Roaster A		Roaster B		Total Emissions (TPY)
	Emissions (lb/hr)	Emissions (TPY)	Emissions (lb/hr)	Emissions (TPY)	
PM	1.43	6.26	1.43	6.26	12.53
PM10	1.43	6.26	1.43	6.26	12.53
PM2.5	1.43	6.26	1.43	6.26	12.53
HCl	0.54	2.37	0.54	2.37	4.73
Cl	0.003	0.01	0.003	0.01	0.03
Total HAPs		0.01		2.38	4.76

40 CFR 63.1157(b) HCl and Cl Limit					
HCl (Single HAP)	1.08	4.74	1.08	4.74	9.47
Cl (Single HAP)	0.495	2.17	0.495	2.17	4.34
Total HAPs		2.17		6.90	13.81

Controlled Emissions after Integral Controls					
	Roaster A		Roaster B		Total Emissions (TPY)
	Emissions (lb/hr)	Emissions (TPY)	Emissions (lb/hr)	Emissions (TPY)	
PM	1.43	6.26	1.43	6.26	12.53
PM10/PM2.5	1.43	6.26	1.43	6.26	12.53
HCl (Single HAP)	0.54	2.37	0.54	2.37	4.73
Cl (Single HAP)	0.003	0.01	0.003	0.01	0.03
Total HAPs		0.01		2.38	4.76

Notes:

The integral controls are the venturi, separator, absorber, and packed towers.

Methodology:

Unrestricted Potential Emissions with Integral Controls and Controlled Emissions after Integral Control (TPY) =

5/28/14 stack test results (lb/hr) * conversion (8760 hr/yr) * conversion (1 ton/2000 lbs)

40 CFR 63.1157(b) HCl and Cl Limit - HCl Emission lbs/hr =

5/28/14 stack test results (lb/hr) * 25 ppm (NESHAP Limit) / 5/28/14 stack test results ppm

40 CFR 63.1157(b) HCl and Cl Limit -

Emissions (TPY) = Emissions lbs/hr * conversion (8760 hr/yr) * conversion (1 ton/2000 lbs)

Total emission TPY = Roaster A Emissions (TPY) + Roaster B Emissions (TPY)

Total HAPs (TPY) = HCl + Cl

Assumptions:

Roaster B emission are equal to Roaster A emission

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

Roasters A & B each with 30 MMBtu per hour natural gas burners

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Heat Input Capacity	HHV	Potential Throughput
MMBtu/hr	MMBtu	MMCF/yr
60.0	1020	515.3

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	50 **see below	5.5	84
Potential Emission in tons/yr	0.49	1.96	1.96	0.15	12.88	1.42	21.64

*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	5.411E-04	3.092E-04	1.932E-02	4.638E-01	8.760E-04	4.848E-01

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	1.288E-04	2.834E-04	3.607E-04	9.791E-05	5.411E-04	1.412E-03

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.

Total HAPs	0.49
Worst HAP	0.46

**Appendix A: Emissions Calculations
Iron Oxide Storage Bins Controlled by Baghouse
Storage Bins A and B**

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Unrestricted Potential Emissions					
	Iron Oxide Storage Bin A		Iron Oxide Storage Bin B		Uncontrolled Total Storage Bin Emissions (TPY)
	Potential Emissions (lb/hr)	Potential Emissions (TPY)	Potential Emissions (lb/hr)	Potential Emissions (TPY)	
PM	1.00	4.38	1.00	4.38	8.76
PM10/PM2.5	2.40	10.51	2.40	10.51	21.02

326 IAC 6-3-2 Limit					
	Iron Oxide Storage Bin A		Iron Oxide Storage Bin B		Total Storage Bin Limit (TPY)
	Limit (lb/hr)	Limit (TPY)	Limit (lb/hr)	Limit (TPY)	
PM	6.03	26.41	6.03	26.41	52.82
PM10/PM2.5	NA	NA	NA	NA	NA

		Iron Oxide Storage Bin A		Iron Oxide Storage Bin B		Controlled Total Storage Bin Emissions (TPY)
		Controlled Emissions (lb/hr)	Controlled Emissions (TPY)	Controlled Emissions (lb/hr)	Controlled Emissions (TPY)	
Filterable PM	stack test data	0.05	0.22	0.05	0.22	0.44
Condensable PM	5/28/14	0.07	0.31	0.07	0.31	0.61
	PM	0.05	0.22	0.05	0.22	0.44
	PM10/PM2.5	0.12	0.53	0.12	0.53	1.05

The 326 IAC 6-3-2 limit is 6.03 lb/hr. The storage bin complies with the PM limit without controls.
The storage bins will comply with the PSD limit at a control efficiency of less than 20%.

Assumes Storage Bin B emission are equal to Storage Bin A emission

Methodology

PM is equal to filterable PM.

PM10 and PM2.5 is equal to filterable PM plus condensable PM

Unrestricted Potential Emissions without Integral Controls PM (lb/hr) = Controlled Emissions lb/hr / (1.0 - 0.95 control efficiency)

**Appendix A: Emission Calculations
HCL Storage and Loading Controlled by Fume Scrubber
Hazardous Air Pollutants (HAPs)**

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Hazardous Air Pollutants (HAPs) Emissions From Storage Tanks (Working and Breathing Losses) Using source specific emission calculations

Number of Tanks	Storage Tank ID	Product Stored*	Tank Type	Tank Color/Shade	Tank Dimensions (feet)	Maximum Liquid Volume (gallons)	Product Throughput* (gallons/yr)	HAP Working Losses (lbs/yr)	HAP Standing Losses (lbs/yr)	Total HAP Losses (lbs/yr)	HAP Working Losses (tons/yr)	HAP Standing Losses (tons/yr)	Total Losses (tons/yr)
5	RA tanks 1, 2, 3, 4, 5,	18% HCl Solution	AST/ Vertical	yellow	38 x 12	31,150	15,886,500	0	1,888.43	1,888.43	0.00	0.94	0.94
1	FA tank #1	36% HCl Solution	AST/ Vertical	yellow	38 x 12	31,150	62,300	0	62.79	62.79	0.00	0.03	0.03
6	WPL tanks 1, 2, 3, 4, 5, and 6	Mixed solution FeCl2 : 21%, HCl : 2.5%, Rest water	AST/ Vertical	yellow	38 x 12	31,150	16,821,000	0	420.83	420.83	0.00	0.21	0.21
4	tanks 1, 2, 3, and 4	Non-HAP/Non-VOC Product	AST/ Vertical	yellow	38 x 12	31,150	12,709,200	0	0	0	0.00	0.00	0.00
16												Total:	1.19

Controlled Emissions		
Emissions Control	Efficiency	Loading and Unloading (tpy)
Acid Fume Scrubber	95%	0.06

*The throughput for each tank was provided by the Permittee. Product Throughput (gallons/yr) = Identical Tanks (No.) x Product Throughput (gallons/year)

Basis of Calculations

36% HCl vent vapor composition

Mol wt. of HCl	36.46				
Mol. Wt. of Water	18				
Mol. Wt. of dry air	28.97				
Temp.	10 deg C	50 deg F			
		mole%	Mass	mass%	
Vapor pr of HCl	56.4 mmHg	7.42	270.57	9.17	
Vapor pr of water	1.5 mmHg	0.20	3.55	0.12	
Air	702.1 mmHg	92.38	2676.29	90.71	
Total	760 mmHg	100	2950.42	100	
Av mol wt of vapor	29.50				

WPL vent vapor composition

Mol wt. of HCl	36.46				
Mol. Wt. of Water	18				
Mol. Wt. of dry air	28.97				
Temp.	80 deg C	176 deg F			
		mole%	Mass	mass%	
Vapor pr of HCl	1.4 mmHg	0.18	6.72	0.28	
Vapor pr of water	336.57 mmHg	44.29	797.14	33.04	
Air	422.03 mmHg	55.53	1608.71	66.68	
Total	760 mmHg	100.00	2412.57	100.00	
av mol wt of vapor	24.13				

WPL composition

FeCl2	: 21 %
HCl	: 2.5 %
Water	: 76.5 %

18% HCl vent vapor composition

Mol wt. of HCl	36.46				
Mol. Wt. of Water	18				
Mol. Wt. of dry air	28.97				
Temp.	80 deg C	176 deg F			
		mole%	Mass	mass%	
Vapor pr of HCl	8.6 mmHg	1.13	41.26	1.62	
Vapor pr of water	248 mmHg	32.63	587.37	23.06	
Air	503.4 mmHg	66.24	1918.88	75.32	
Total	760 mmHg	100.00	2547.51	100.00	
av mol wt of vapor	25.48				

Venting conditions

B. FA tanks	
No of tanks	1
Capacity of each tank	31,150.00 gallons
turnover per year each tank	2
Total volume displacement	62,300.00 gallons/year
Vapor release	62,300.00 gallons/year
	8,328.30 ft3/year
	235.80 actual m3/year
	235.80 Nm3/year
	310.58 kg/year
HCl release from FA	684.70 lbs/year

C. WPL tanks	
No of tanks	1
Capacity of each tank	31,150.00 gallons
turnover per year each tank	90
Total volume displacement	2,803,500.00 gallons/year
Vapor release	2,803,500.00 gallons/year
	374773.44 ft3/year
	10610.85 actual m3/year
	10610.85 Nm3/year
	11428.30 kg/year
	25194.66 lbs/year
HCl release from WPL tank	70.14 lbs/year

A. RA tanks	
No of tanks	1
Capacity of each tank	31,150.00 gallons
turnover per year each tank	102
Total volume displacement	3,177,300.00 gallons/year
Vapor release	3,177,300.00 gallons/year
	424,743.23 ft3/year
	12,025.63 actual m3/year
	9,301.43 Nm3/year
	10,578.33 kg/year
	23,320.84 lbs/year
HCl release from RA tank	377.69 lbs/year

**Appendix A: Emissions Calculations
Bagging and Milling Process**

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North State Road 149
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Emission Unit Description	Inlet grain (gr/acf)	Outlet grain (gr/acf)	Flow Rate (acfm)	Operating Hours (hr/yr)	PM/PM ₁₀ /PM _{2.5}		
					Unrestricted Potential Emissions* (ton/yr)	Control Efficiency (%)	Controlled Potential Emissions (ton/yr)
Bagging P-1 or P-2	3.0	0.03	666	2500	21.4	99%	0.2
P-3 Milling Unit Loading	3.0	0.03	666	1250	10.7	99%	0.1
Total:					32.1		0.3

The 326 IAC 6-3-2 limit is 13.6 lb/hr. The bagging and milling process complies with the PM limit without controls.

METHODOLOGY

The source has a bottleneck of 30,000 tons/yr, each bag fill of 1 ton takes 5 min. Therefore, total operating time is 2500 hrs/yr.

P-3 will run half the time of Bagging Units (1250 hrs).

*Uncontrolled Potential Emissions (tons/yr) = Inlet Gran (gr/acf) * Flow Rate (acfm) * 1 lb/7000 gr * 60 min/hr * 2500 hrs/yr * 1 ton/2000 lbs

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

One four (4) MMBtu per hour Boiler associated with

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Heat Input Capacity MMBtu/hr	HHV MMBtu MMscf	Potential Throughput MMCF/yr
3.3	1020	28.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.0	0.1	0.1	0.0	1.4	0.1	1.2

*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	3.019E-05	1.725E-05	1.078E-03	2.587E-02	4.887E-05	2.705E-02

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	7.187E-06	1.581E-05	2.012E-05	5.462E-06	3.019E-05	7.877E-05

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.

Total HAPs	0.03
Worst HAP	0.03

Appendix A: Emissions Calculations
Enrichment Facility Including One (1) Process Tank Controlled by an Acid Fume Scrubber

Company Name: Magnetics International Inc.
Address City IN Zip: 1111 North SR 149, Burns Harbor, IN 46304
Permit ID: T127-35710-00039
Reviewer: Monica Dick

Uncontrolled HCl Emissions

$$4.17 \frac{\text{lb-mole}}{\text{flow (hr)}} * 0.0012 \frac{\text{lb-mole HCl}}{\text{lb-mole}} = 0.005 \frac{\text{HCl lb-moles}}{\text{hr}}$$

$$0.005 \frac{\text{HCl lb-moles}}{\text{hr}} * 36.44 \frac{\text{lbs}}{\text{lb-mole HCl}} = 0.18 \frac{\text{HCl lbs}}{\text{hr}}$$

$$0.18 \frac{\text{HCl lbs}}{\text{hr}} * 8760 \frac{\text{hrs}}{\text{yr}} / 2000 \frac{\text{lbs}}{\text{hr}} = \mathbf{0.81 \frac{\text{HCl tons}}{\text{yr}}}$$

Controlled HCl Emissions

$$0.81 \frac{\text{Uncontrolled HCl tons}}{\text{yr}} * (100\% \text{ percent} - 95\% \text{ percent efficient}) = \mathbf{0.04 \frac{\text{HCl tons}}{\text{yr}}}$$

Indiana Department of Environmental Management
Office of Air Quality

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

Air Pollution Control Justification as an Integral Part of the Process

The applicant has submitted the following justification such that the: venturi scrubber and separator; and, packed bed water scrubbers be considered as an integral part of the two (2) iron oxide and hydrochloric acid production lines:

- (a) The venturi and separator serves a primary purpose other than pollution control.

The venturi, and separator are integral parts of the total operation. Once the roaster temperature is reached at a set temperature, ferrous chloride solution (FCS) is pumped to the separator and recirculated through the venturi scrubber. The liquid from the separator is continuously fed to the venturi scrubber in order to quench the incoming hot off-gases from the roaster and to concentrate the FCS in the separator. Once the concentrated FCS reaches the equilibrium concentration, it is fed into the roaster in the form of a fine mist like spray.

The primary purpose of the venturi scrubber and the separator is to recuperate the heat from the off gases coming out of the roaster and use that heat to concentrate the incoming FCS by evaporating water. The hot gases from the roaster enters the venturi and is quenched and the liquid concentrates. The liquid vapor equilibrium mixture leaves through the bottom port of venturi and enters the separator where the liquid and vapor is separated because of its relative density and its angular momentum. The liquid is collected at the bottom of the separator and the gas leaves through the top port of the separator and on to the packed bed scrubbers.

The venturi and separator also serve a secondary purpose of collecting suspended fine iron oxide particulate matter produced in the reactor and carried over with the off-gas from the roaster. The oxide particles are collected because of the adhesion with the high surface area of liquid which is generated in the venturi. The oxide particles reacts with the free hydrochloric acid in the FCS and produces ferric chloride. Therefore, the particulate matter entrained in the off-gas, which leaves the venturi and eventually from the separator, will be dramatically reduced due to production of ferric chloride that results in an increased iron content of the FCS that is introduced to the roaster.

Particulate collection is also effected in the absorber and water scrubbers. This equipment consists of packed columns which create high contact surface area not only for absorption of soluble gasses in the liquid, which is continuously being recirculated with a spray at the top of packed bed, but also has ability to collect fine suspended particles, entrained in the off-gas, which are present downstream from the venturi and separator.

- (b) The equipment has an overwhelming positive net economic effect.

The venturi and separator are integral parts of the total operation. FCS is first introduced to the venturi and separator prior to being sprayed into the roaster where the chemical reaction takes place. The primary function of the venturi is to function as a heat recovery device by quenching the hot gases from the roaster and concentration of the raw material feed. Operation of the process without the venturi and separator would result in the destruction of downstream process vessels which are constructed from fiberglass with a maximum temperature limit of 203 °F.

The process cannot operate without the venturi but **if** the process could be operated without the venturi there would be no concentration of the incoming raw material feed. The incoming feed is typically concentrated by approximately 25% prior to being sprayed into the roaster. Without concentration the process would require a 25% increase in natural gas consumption. The following equation calculates the increase in annual costs for natural gas if the roaster could operate without a venturi.

The particulate matter captured by the venturi and separator that would otherwise remain entrained in the gas stream results in the production of ferric chloride due to the reaction with hydrochloric acid. The ferric chloride, when reacted in the spray roaster, results in the production of iron oxide. The iron oxide produced from the reaction of ferric chloride can be estimated at 10% of the total iron oxide produced. At an estimated value of \$100 per ton the value of the iron oxide produced from the generation of ferric chloride would equate to approximately \$135,000 per year.

Density of water	8.345 lbs/gallon
Heat of evaporation of water	990 BTU/lbs
Cost of MMBTU	\$3.76
Plant capacity	45 gpm
Volume reduction	25%
Water evaporation	11.25 gpm
Heat required for evaporation	92942.44 BTU/min
	5.58 MMBT/U
Estimated operating hours	7884 hours/year
Total cost savings	\$165,300 per hour

The following table captures cost estimates for one venturi, and one separator.

Equipment Cost (Venturi & Separator)			
	Pricing	Qty	Total Cost
Venturi scrubber	\$75,000	1	\$75,000
Separator	\$75,000	1	\$75,000
Pump	\$8,500	1	\$8,500
Piping & Controls (each)	\$5,000	4	\$20,000
Installation	\$20,000	1	\$20,000
			\$198,500

- (c) The Water Scrubbers serve a primary purpose other than pollution control.

These collector scrubbers are an integral part of the total operation and capture a significant amount of HCl that is incorporated into the finished product. If the scrubbers were not a part of the process a significant amount of HCl that would have otherwise been captured would be emitted into the atmosphere. Every pound of HCl captured in our process is directly proportionate to the amount of HCl that would be otherwise purchased had the acid not been produced, captured and incorporated in the final product to satisfy the total customer's requirements. HCl is provided to customers based on 100% contractual supply agreements. Meaning, the facility is contractual bound to provide 100% of the customer's HCl requirements. If the facility did not supply the material then the material would have to be purchased on the market and supplied to the customer.

The scrubbers do have a positive effect on total plant emissions but primarily the function is to capture HCl for incorporation into our finished product. Based on the current

operation it is anticipated that 185 pounds of HCl is captured by the two scrubbers. This would equate to 584 pounds per hour of 32% concentration HCl--on an annual basis 2,558 tons. In recent history, 32% HCl ranges in price from \$100 to \$150 per ton. Using \$125 per ton as an average market value for the HCl, the scrubbers produce HCl with a market value of \$320,000 annually.

The following table captures cost estimates for the purchase and installation of two (2) scrubbers.

Equipment Cost (Scrubbers):

	Pricing	Quantity	Total Cost
Scrubbers (each)	\$50,000	2	\$100,000
Pumps (each)	\$850	4	\$34,000
Piping & Controls (each)	\$20,000	2	\$40,000
Foundations (each)	\$10,000	2	\$20,000
Installation	\$20,000	1	<u>\$20,000</u>
			\$214,000

Cost Savings Analysis

Venturi, Separator and Scrubbers

Capital Cost CI	=	\$412,500 (Total)
Interest	=	7% EPA Default
Equipment Life	=	20 years
Capital Recovery Factor (CRF)	=	0.09
Annualized Cost for Capital Recovery	=	\$37,125 Cost per year

Direct Annual Cost (DC)

Operating labor		
Operator (2 hrs x 360 days x \$20/hr)	=	\$14,400
Supervisor (15% of Operator Cost)	=	\$2,160
Maintenance		
Labor (2 hrs x 360 days x \$20/hr)	=	\$14,400
Material (100% of labor Cost)	=	\$14,400
Utilities		
Fan	=	\$8,500
Pump	=	\$5,000
Total direct Annual Cost	=	\$58,860

Indirect Annual Cost (IC)

Administrative Charges (0.02 x CI)	=	\$8,250
Property tax (0.01 x CI)	=	\$4,125
Insurance (0.01 x CI)	=	\$4,125
Overhead (0.6 x Labor & Material)	=	\$17,280
Total Indirect Annual Cost	=	\$33,780

Total Annual Operating Cost (CR + DC + IC) = \$129,765

HCl Captured in the scrubbers	=	2558 tons per year
Cost of HCl Material	=	\$125 cost per ton
Cost of HCl Captured	=	\$320,000 cost per year

Heat required for evaporation	=	5.58 MMBTU/h
Estimated Operating Hours	=	7884 h/year

Total Cost Savings	=	\$165,310 per year
Iron Oxide	=	2,980,100 lbs./year
Tons	=	1,354 metric tons
Price per Ton	=	\$100
Cost of Material Captured	=	\$135,461/year

As seen from the: cost of the material recovered; total cost savings; and, the cost of the equipment, the result overwhelmingly demonstrates that the venturi, separator and packed bed scrubbers are integral parts of the process and are necessary for cost effective operation of the two (2) iron oxide and hydrochloric acid production lines.

- (d) The process cannot operate without the equipment.

The venturi, separator and packed bed scrubbers do not operate independent of the operation. The venturi, separator and packed bed scrubbers are interlocked with the operations therefore the roasters cannot operate without this equipment being on-line. The venturi functions as a heat recovery device by quenching the hot gases from the roaster and concentration of the raw material feed. If the process could operate without the venturi the hot gases from the process would destroy the process vessels and/or results in a 25% increase in natural gas consumption. The packed bed scrubbers captures a significant amount of HCl that is incorporated into the finished product and if they were not a part of the process a significant amount of HCl would be lost and then HCl would need to be purchased to incorporate into the final product to satisfy the customer's requirements.

IDEM, OAQ has evaluated the justifications and agreed that the venturi, separator and packed bed scrubbers, will be considered as an integral part of the two (2) iron oxide and hydrochloric acid production lines. Therefore, the permitting level will be determined using the potential to emit for HCl, PM, PM10, PM2.5 after the packed bed scrubbers. An operating condition in the proposed permit will specify that this venturi, separator and packed bed scrubbers shall operate at all times when the two (2) iron oxide and hydrochloric acid production lines are in operation.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 9, 2015

Franz Mullings
Magnetics International Corporation
1111 N. SR 149
Burns Harbor, Indiana 46304

Re: Public Notice
Magnetics International Corporation
Permit Level: Title V – Permit Renewal
Permit Number: 127-35710-00039

Dear Mr. Mullings:

Enclosed is a copy of your draft Title V – Permit Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Vidette Times in Munster, Indiana publish the abbreviated version of the public notice no later than February 11, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Westchester Public Library, 200 West Indiana Avenue in Munster, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Monica Dick, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-1243 or dial (317) 234-1243.

Sincerely,

Vicki Biddle

Vicki Biddle
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

February 8, 2016

Vidette Times
601 West 45th Street
Munster, Indiana 46304

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Magnetics International Inc., Porter County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than Thursday, February 11, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call «admincontact» at 800-451-6027 and ask for extension 3-6867 or dial 317-23«extension».

Sincerely,

Vicki Biddle

Vicki Biddle
Permit Branch
Office of Air Quality

Permit Level: Title V - Renewal
Permit Number: 127-35710-00039

Enclosure

PN Newspaper.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

February 9, 2016

To: Westchester Public Library

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: Magnetics International Inc.
Permit Number: Title V – Permit Renewal

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 8/27/2015



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100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

February 9, 2016
Magnetics International Corporation
127-35710-00039

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 8/27/2015



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD DRAFT INDIANA AIR PERMIT

February 9, 2016

A 30-day public comment period has been initiated for:

Permit Number: 127-35710-00039
Applicant Name: Magnetics International Incorporation
Location: Burns Harbor, Porter County, Indiana

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:

<http://www.in.gov/ai/appfiles/idem-caats/>

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 8/27/2015

Mail Code 61-53

IDEM Staff	VBIDDLE 2/9/2016 Magnetics International Incorporated 127-35710-00039 DRAFT			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Franz Mullings Magnetics International Incorporated 1111 N SR 149 Burns Harbor IN 46304 (Source CAATS)										
2		Michael Sieckmann VP Magnetics International Incorporated 661 Andersen Dr, Foster Plz #7 Pittsburgh PA 15220 (RO CAATS)										
3		Westchester Public Library 200 W Indiana Ave Chesterton IN 46304-3122 (Library)										
4		Porter County Board of Commissioners 155 Indiana Ave, Ste 205 Valparaiso IN 46383 (Local Official)										
5		Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 (Health Department)										
6		Shawn Sobocinski 5950 Old Porter Rd Aprt 306 Portage IN 46368-1558 (Affected Party)										
7		Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 (Affected Party)										
8		Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 (Affected Party)										
9		Mark Coleman 8 Turret Rd. Portage IN 46368-1072 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 (Affected Party)										
11		James Grabovac 22 Deer Trail Ogden Dunes IN 46368 (Affected Party)										
12		Burns Harbor Town Council 1240 N. Boo Rd Burns Harbor IN 46304 (Local Official)										
13		Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party)										
14		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
15		Donald Kuschel 1111 North State Road 149 Burns Harbor IN 46304 (Source & addl contact)										

Total number of pieces Listed by Sender 15	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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