



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

### NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a  
Significant Revision to a  
Federally Enforceable State Operating Permit (FESOP)

for Magnesium Technologies Corporation., dba Rossborough in St. Joseph County

Significant Permit Revision No.: 141-40484-00185

The Indiana Department of Environmental Management (IDEM) has received an application from Magnesium Technologies Corporation., dba Rossborough, located at 205 State Road 104, Walkerton, IN 46574, for a significant revision of its FESOP issued on March 11, 2015. If approved by IDEM's Office of Air Quality (OAQ), this proposed revision would allow Magnesium Technologies Corporation., dba Rossborough to make certain changes at its existing source. Magnesium Technologies Corporation., dba Rossborough has applied to add five (5) new lime storage vessels to its operation.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, 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). The potential to emit regulated air pollutants will continue to be limited to less than the Title V and PSD major threshold levels. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

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

Walkerton-Lincoln Township Public Library  
406 Adams Street  
Walkerton, IN 46574

and

IDEM Northern Regional Office  
300 North Dr. Martin Luther King Jr. Boulevard, Suite 450  
South Bend, IN 46601-1295

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

#### 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 30<sup>th</sup> 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 SPR 141-40484-00185 in all correspondence.

**Comments should be sent to:**

Taylor Wade  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Taylor Wade or (317) 233-0868  
Or dial directly: (317) 233-0868  
Fax: (317) 232-6749 attn: Taylor Wade  
E-mail: [twade@idem.IN.gov](mailto:twade@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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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 12<sup>th</sup> floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Taylor Wade or my staff at the above address.



Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

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**Bruno L. Pigott**  
Commissioner

Mr. David Hostetler  
Magnesium Technologies Corporation dba Rossborough  
P.O. Box 175  
Walkerton, IN 46574

Re: 141-40484-00185  
Significant Revision to  
F141-34546-00185

Dear Mr. Hostetler:

Magnesium Technologies Corp., dba Rossborough was issued a Federally Enforceable State Operating Permit (FESOP) Renewal No. F141-34546-00185, on March 11, 2015, for a stationary magnesium processing and packaging operation located at 205 State Road 104, Walkerton, IN 46574. On September 18, 2018, the Office of Air Quality (OAQ) received an application from the source requesting to add . Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, the following emission units are approved for construction at the source:

Five (5) Lime Storage Vessels, identified as LSV3 through LSV 7, approved in 2018 for construction, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2.

Emission Unit	Year Constructed	Control	Stack
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this permit revision approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the

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rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the Significant Permit Revision into the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached the entire FESOP as revised.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Taylor Wade, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.

Sincerely,

Heath Hartley, Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Revised permit and Technical Support Document.

cc: File - St. Joseph County  
St. Joseph County Health Department  
U.S. EPA, Region 5  
Compliance and Enforcement Branch  
IDEM Northern Regional Office



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Commissioner

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

**Magnesium Technologies Corp., dba Rossborough**  
**205 State Road 104**  
**Walkerton, Indiana 46574**

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

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

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

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

Operation Permit No.: F141-34546-00185	
Master Agency Interest ID.: 14518	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 11, 2015  Expiration Date: March 11, 2025
Significant Permit Revision No.: 141-40484-00185	
Issued by:  Heath Hartley, Section Chief Permits Branch Office of Air Quality	Issuance Date:  Expiration Date: March 11, 2025

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## SECTION A

## SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary magnesium processing and packaging operation.

Source Address:	205 State Road 104, Walkerton, Indiana 46574
General Source Phone Number:	574-586-9559
SIC Code:	3341 (Secondary Nonferrous Metals)
County Location:	St Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State 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 2-8-3(c)(3)]

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

- (a) Three (3) Primary Magnesium Granulating lines, identified as MgL1, MgL2, and MgL3, constructed in 1994, consisting of one (1) chipper and two (2) grinders per line, with a maximum capacity of 1,000 pounds per hour per line, each equipped with a cyclone integral to the lines, identified as C1, C2, and C3, respectively, and exhausting to stacks C1, C2, and C3, respectively. Each cyclone has an exhaust air flow rate of 1,800 cfm.
- (b) Two (2) Lime Receiving Silos, identified as S1 and S2, constructed in 2002, with a combined capacity of 19,000 pounds per hour and each having a storage capacity of 150,000 pounds, each controlled by a dust collector for particulate control, identified as CF1 and CF2, respectively, and exhausting to stacks CF1 and CF2, respectively. Each dust collector has an exhaust air flow rate of 500 cfm.
- (c) Two (2) Lime Granulating and Screening Units, identified as LG1 and LG2, constructed in 2002, with a combined process capacity of 19,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-A, and exhausting to stack DF02-4-A. The dust collector has an exhaust air flow rate of 500 cfm.
- (d) Five (5) Pig Storage Hoppers for Granulated Lime, identified as PS1 – PS5, constructed in 2002, with a combined capacity of 19,000 pounds per hour, and each having a storage capacity of 200,000 pounds, controlled by one (1) dust collector for particulate control, identified as CF3, and exhausting to stack CF3. The dust collector has an exhaust air flow rate of 500 cfm.
- (e) Seven (7) Lime Storage Vessels, identified as LSV1 through LSV 7, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.



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Emission Unit	Year Constructed	Control	Stack
LSV1	1994	WB1	WB1
LSV2	1994	DF02-2	DF02-2
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2

- (f) One (1) Flow Lime Blending Unit, identified as BCL, constructed in 1998, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B. The dust collector has an exhaust air flow rate of 500 cfm.
- (g) One (1) enclosed vehicle loading operation, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B. The dust collector has an exhaust air flow rate of 500 cfm.

Particulate control, identified as DF02-4-B, is a common control for the Flow Lime Blending Unit, identified as BCL, and the enclosed vehicle loading operation.

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

This stationary source also includes the following insignificant activities:

- (a) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (b) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (1) One (1) 300 gallon above ground Diesel Fuel Tank (over the road diesel).
- (2) One (1) 500 gallon above ground Diesel Fuel Tank (off the road diesel tank) for yard trucks and forklifts.
- (c) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (1) Source maintenance activities.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (1) Source maintenance activities.
- (e) Closed loop heating and cooling systems.
- (1) Electric forced air heating and cooling systems.
- (f) Activities associated with the transportation and treatment of sanitary sewage, provided

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discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.

- (1) Enclosed subsurface septic system.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (h) On-site fire and emergency response training approved by the department.
  - (1) "No open flame" training conducted for local emergency response agencies.
- (i) A laboratory as defined in 326 IAC 2-7-1(21)(D).
  - (1) QA/QC physical analysis laboratory.
- (j) Other categories with emissions below insignificant thresholds:
  - (1) One (1) 13,000 gallon Liquefied Nitrogen Tank.
  - (2) Four (4) Argon Fire Suppression Systems using bottled Argon Cylinders.

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

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

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## SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F141-34546-00185, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

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

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

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

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

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

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

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

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

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

The Permittee shall implement the PMPs.

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

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

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

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

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northern 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  
Northern Regional Office phone: (574) 245-4870; fax: (574) 245-4877.

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

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

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

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

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

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(C) Corrective actions taken.

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

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

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

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

- 
- (a) All terms and conditions of permits established prior to F141-34546-00185 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
- (2) revised, or

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(3) deleted.

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

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

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

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

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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



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

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

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

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

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- (4) The Permittee notifies the:

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

and

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

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

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

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

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

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

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

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

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

---

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

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

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

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

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

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

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

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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.

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## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

(a) Pursuant to 326 IAC 2-8:

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

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

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

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

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

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

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

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Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

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

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

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

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

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

All required notifications shall be submitted to:

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

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MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

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

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

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

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- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

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

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

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

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

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

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

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

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

**C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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

**C.13 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]**

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

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

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

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

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

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

### **C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

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

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

Records of required monitoring information include the following, where applicable:

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

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be 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.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

- (b) The address for report submittal is:

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

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- (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.17 Compliance with 40 CFR 82 and 326 IAC 22-1**

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

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## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Three (3) Primary Magnesium Granulating lines, identified as MgL1, MgL2, and MgL3, constructed in 1994, consisting of one (1) chipper and two (2) grinders per line, with a maximum capacity of 1,000 pounds per hour per line, each equipped with a cyclone integral to the lines, identified as C1, C2, and C3, respectively, and exhausting to stacks C1, C2, and C3, respectively. Each cyclone has an exhaust air flow rate of 1,800 cfm.
- (b) Two (2) Lime Receiving Silos, identified as S1 and S2, constructed in 2002, with a combined capacity of 19,000 pounds per hour and each having a storage capacity of 150,000 pounds, each controlled by a dust collector for particulate control, identified as CF1 and CF2, respectively, and exhausting to stacks CF1 and CF2, respectively. Each dust collector has an exhaust air flow rate of 500 cfm.
- (c) Two (2) Lime Granulating and Screening Units, identified as LG1 and LG2, constructed in 2002, with a combined process capacity of 19,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-A, and exhausting to stack DF02-4-A. The dust collector has an exhaust air flow rate of 500 cfm.
- (d) Five (5) Pig Storage Hoppers for Granulated Lime, identified as PS1 – PS5, constructed in 2002, with a combined capacity of 19,000 pounds per hour, and each having a storage capacity of 200,000 pounds, controlled by one (1) dust collector for particulate control, identified as CF3, and exhausting to stack CF3. The dust collector has an exhaust air flow rate of 500 cfm.
- (e) Seven (7) Lime Storage Vessels, identified as LSV1 through LSV 7, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.

Emission Unit	Year Constructed	Control	Stack
LSV1	1994	WB1	WB1
LSV2	1994	DF02-2	DF02-2
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2

- (f) One (1) Flow Lime Blending Unit, identified as BCL, constructed in 1998, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B. The dust collector has an exhaust air flow rate of 500 cfm.
- (g) One (1) enclosed vehicle loading operation, rated at 16,000 pounds per hour, controlled by one (1) dust collector for particulate control, identified as DF02-4-B, constructed in 2002, and exhausting to stack DF02-4-B. The dust collector has an exhaust air flow rate of 500 cfm.

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Particulate control, identified as DF02-4-B, is a common control for the Flow Lime Blending Unit, identified as BCL, and the enclosed vehicle loading operation.

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

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

Unit	Control	Stack	PM (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	2.13
Lime Receiving Silo 1 (S2)	CF2	CF2	2.13
Lime Granulating and Screening Unit (LG1 )	DF02-4-A	DF02-4-A	0.16 combined
Lime Granulating and Screening Unit (LG2)			
Pig Storage Hoppers (PS1-PS5)	CF3	CF3	4.26 combined
Lime Storage Vessels (LSV1, LSV3, LSV 4, LSV 5)	WB1	WB1	1.74
Lime Storage Vessels (LSV2, LSV 6, LSV 7)	DF02-2	DF02-2	1.74
Flow Lime Blending Unit (BCL)	DF02-4-B	DF02-4-B	4.48 combined
Vehicle Loading			

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.2 FESOP, PSD Minor Limits [326 IAC 2-8-4] [326 IAC 2-2]

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

Unit	Control	Stack	PM10 (pounds per hour)	PM2.5 (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	1.065	1.065
Lime Receiving Silo 1 (S2)	CF2	CF2	1.065	1.065
Lime Granulating and Screening Unit (LG1 )	DF02-4-A	DF02-4-A	0.08 combined	0.08 combined
Lime Granulating and Screening Unit (LG2)				
Pig Storage Hoppers (PS1-PS5)	CF3	CF3	2.13 combined	2.13 combined
Lime Storage Vessels (LSV1, LSV3, LSV	WB1	WB1	0.90	0.90

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4, LSV 5)				
Lime Storage Vessels (LSV2, LSV 6, LSV 7)	DF02-2	DF02-2	0.90	0.90
Flow Lime Blending Unit (BCL)	DF02-4-B	DF02-4-B	2.29 combined	2.29 combined
Vehicle Loading				

Compliance with these limits, combined with the limited potential to emit PM<sub>10</sub> and PM<sub>2.5</sub> from all other emission units at the source, shall limit the source-wide total potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 not applicable.

#### D.1.3 Particulate [326 IAC 6.5-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), the particulate matter emissions from the magnesium granulating lines (MgL1, MgL2, and MgL3), lime receiving silos (S1 and S2), lime granulating and screening units (LG1 and LG2), pig storage hoppers (PS1 through PS5), lime storage vessels (LSV1 through LSV7), flow lime blending (BCL), and vehicle loading shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf) of exhaust air.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements [326 IAC 2-8-4(1)]

#### D.1.5 Testing Requirements [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, PM<sub>2.5</sub> testing of the cyclone C1, controlling Primary Magnesium Granulating Line 1 (MgL1), utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (b) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, PM<sub>2.5</sub> testing of the cyclone C2, controlling Primary Magnesium Granulating Line 2 (MgL2), utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (c) In order to demonstrate compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall perform PM, PM<sub>10</sub>, PM<sub>2.5</sub> testing of the cyclone C3, controlling Primary Magnesium Granulating Line 3 (MgL3), utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid compliance demonstration.
- (d) 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 obligations with regard to the performance testing required by this condition.

#### D.1.6 Particulate Control

- (a) In order to assure compliance with Conditions D.1.1, D.1.2 and D.1.3, cyclones (C1, C2 and C3) for magnesium granulating lines MgL1, MgL2, and MgL3 for particulate control, shall be in operation and control emissions from the magnesium granulating lines MgL1, MgL2, and MgL3 at all times the corresponding magnesium grinding line is in operation.

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- (b) In order to assure compliance with Conditions D.1.1, D.1.2 and D.1.3, the baghouses (CF1, CF2, DF02-4-A, CF3, WB1, DF02-2 and DF02-4-B) for particulate control shall be in operation and control emissions from the lime storage silos (S1, S2), the lime granulating and screening units (LG1, LG2), the pig storage hoppers (PS1–PS5), the lime storage vessels (LSV1 through LSV7), the flow lime blending (BCL), and vehicle loading at each time the lime storage silos, lime granulating and screening units, pig storage hoppers, lime storage vessels, flow lime blending, and vehicle loading are in operation, respectively.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**Compliance Monitoring Requirements [326 IAC 2-8-4][326 IAC 2-8-5(a)(1)]****D.1.7 Visible Emissions Notations**

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- (a) Visible emission notations of the cyclones (C1, C2, C3) and the dust collectors (CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

**D.1.8 Broken or Failed Bag Detection**

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

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emergency provisions of this permit (Section C- Response to Excursions or Exceedances).

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

#### D.1.9 Cyclone Failure Detection

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In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Section C Response to Excursions or Exceedances contains the Permittee's obligations with regard to the records required by this condition; failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.10 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of once per day visible emission notations of C1, C2, C3, CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) Section C General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.



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

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

Source Name: Magnesium Technologies Corp., dba Rossborough  
Source Address: 205 State Road 104, Walkerton, Indiana 46574  
FESOP Permit No.: F141-34546-00185

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Magnesium Technologies Corp., dba Rossborough  
Source Address: 205 State Road 104, Walkerton, Indiana 46574  
FESOP Permit No.: F141-34546-00185

**This form consists of 2 pages**

**Page 1 of 2**

- |  |
|--|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16</li></ul> |
|--|

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

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

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

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

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

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

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

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

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

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

Source Name: Magnesium Technologies Corp., dba Rossborough  
Source Address: 205 State Road 104, Walkerton, Indiana 46574  
FESOP Permit No.: F141-34546-00185

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

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This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

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

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

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

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

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

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

**Source Description and Location**

<b>Source Name:</b>	<b>Magnesium Technologies Corporation dba Rossborough</b>
<b>Source Location:</b>	<b>205 State Road 104, Walkerton, IN 46574</b>
<b>County:</b>	<b>St. Joseph</b>
<b>SIC Code:</b>	<b>3341 (Secondary Smelting and Refining of Nonferrous Metals)</b>
<b>Operation Permit No.:</b>	<b>F 141-34546-00185</b>
<b>Operation Permit Issuance Date:</b>	<b>March 11, 2015</b>
<b>Significant Permit Revision No.:</b>	<b>141-40484-00185</b>
<b>Permit Reviewer:</b>	<b>Taylor Wade</b>

**Existing Approvals**

The source was issued FESOP Renewal No. 141-34546-00185 on March 11, 2015. There have been no subsequent approvals issued.

**County Attainment Status**

The source is located in St. Joseph County.

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

- (a) Ozone Standards  
Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) PM<sub>2.5</sub>  
St. Joseph County has been classified as attainment for PM<sub>2.5</sub>. Therefore, direct PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

St. Joseph County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Fugitive Emissions**

Since this type of operation is not one (1) of the twenty-eight (28) listed source categories under 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B), and there is no applicable New Source Performance Standard or National Emission Standard for Hazardous Air Pollutants 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.

**Greenhouse Gas (GHG) Emissions**

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

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

**Source Status - Existing Source**

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

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Combined HAPs
Magnesium Granulating Line 1	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 2	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 3	4.38	4.38	4.38	-	-	-	-	-	-
Lime Storage Silo 1	9.33	4.66	4.66	-	-	-	-	-	-
Lime Storage Silo 2	9.33	4.66	4.66	-	-	-	-	-	-
Granulating and Screening	0.70	0.35	0.35	-	-	-	-	-	-
Pig Storage Hoppers	18.66	9.33	9.33	-	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Combined HAPs
Lime Storage Vessel 1	7.62	3.92	3.92	-	-	-	-	-	-
Lime Storage Vessel 2	7.62	3.92	3.92	-	-	-	-	-	-
Flow Lime Blending Unit	19.62	10.03	10.03	-	-	-	-	-	-
Closed Vehicle Loading				-	-	-	-	-	-
<b>Total PTE of Entire Source</b>	<b>86.02</b>	<b>50.02</b>	<b>50.02</b>	-	-	-	-	-	-
Title V Major Source Thresholds**	-	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

- (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 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).
- (c) These emissions are based on the TSD of Renewal No.: 141-34546-00185, issued on March 11, 2015.

#### Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Magnesium Technologies Corporation dba Rossborough on September 18, 2018 relating to adding five (5) new lime storage vessels to its operation. The following is a list of the new emission units:

- (a) Five (5) Lime Storage Vessels, identified as LSV3 through LSV 7, approved in 2018 for construction, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2.

Emission Unit	Year Constructed	Control	Stack
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2



### Bottleneck Throughput

The throughput to the vessels is bottlenecked by the output of the Flow Lime Blending Unit. Only one storage vessel can physically be loaded at a time. Therefore, the maximum combined throughput of the seven storage vessels is 16,000 pounds per hour.

### Enforcement Issues

There are no pending enforcement actions related to this revision.

### Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

### Permit Level Determination – FESOP Significant Permit Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8-11.1 (Permit Revisions). This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Combined HAPs
Lime Storage Vessel 3	77.09	77.09	77.09	-	-	-	-	-	-
Lime Storage Vessel 4	77.09	77.09	77.09	-	-	-	-	-	-
Lime Storage Vessel 5	77.09	77.09	77.09	-	-	-	-	-	-
Lime Storage Vessel 6	77.09	77.09	77.09	-	-	-	-	-	-
Lime Storage Vessel 7	77.09	77.09	77.09	-	-	-	-	-	-
<b>Total PTE of Revision</b>	<b>386.60</b>	<b>385.68</b>	<b>385.51</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<sup>1</sup> Under the Part 70 Permit program (40 CFR 70), PM <sub>10</sub> and PM <sub>2.5</sub> , not particulate matter (PM), are each considered as a "regulated air pollutant." <sup>2</sup> PM <sub>2.5</sub> listed is direct PM <sub>2.5</sub> . <sup>3</sup> Single highest source-wide HAP.									

Appendix A of this TSD reflects the potential emissions of the proposed revision in detail.

Pursuant to 326 IAC 2-8-11.1(f)(1)(E), this FESOP is being revised through a FESOP Significant Permit Revision because the proposed revision is not an Administrative Amendment or Minor Permit revision and the proposed revision involves the construction of new emission units involves a change in operation, where the PTE of any pollutant increases as indicated below with potential to emit greater than or equal to twenty-five (25) tons per year of the following pollutants:

- (i) PM, PM<sub>10</sub>, or direct PM<sub>2.5</sub>.

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Combined HAPs
Magnesium Granulating Line 1	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 2	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 3	4.38	4.38	4.38	-	-	-	-	-	-
Lime Storage Silo 1	9.33	4.66	4.66	-	-	-	-	-	-
Lime Storage Silo 2	9.33	4.66	4.66	-	-	-	-	-	-
Granulating and Screening	0.70	0.35	0.35	-	-	-	-	-	-
Pig Storage Hoppers	18.66	9.33	9.33	-	-	-	-	-	-
Lime Storage Vessel 1	7.62	3.92	3.92	-	-	-	-	-	-
<b>Lime Storage Vessel 3</b>				-	-	-	-	-	-
<b>Lime Storage Vessel 4</b>				-	-	-	-	-	-
<b>Lime Storage Vessel 5</b>				-	-	-	-	-	-
Lime Storage Vessel 2	7.62	3.92	3.92	-	-	-	-	-	-
<b>Lime Storage Vessel 6</b>				-	-	-	-	-	-
<b>Lime Storage Vessel 7</b>				-	-	-	-	-	-
Flow Lime Blending Unit	19.62	10.03	10.03	-	-	-	-	-	-
Closed Vehicle Loading				-	-	-	-	-	-
<b>Fugitive Emissions (Paved Roads)</b>	<b>1.15</b>	<b>0.23</b>	<b>0.06</b>	-	-	-	-	-	-
Total PTE of Entire Source	<b>87.18</b>	<b>50.25</b>	<b>50.08</b>	-	-	-	-	-	-
Title V Major Source Thresholds	-	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."  
<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>3</sup>Single highest source-wide HAP.

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)								
	PM <sup>1</sup>	PM <sub>10</sub> <sup>1</sup>	PM <sub>2.5</sub> <sup>1, 2</sup>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Single HAP <sup>3</sup>	Combined HAPs
Magnesium Granulating Line 1	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 2	4.38	4.38	4.38	-	-	-	-	-	-
Magnesium Granulating Line 3	4.38	4.38	4.38	-	-	-	-	-	-
Lime Storage Silo 1	9.33	4.66	4.66	-	-	-	-	-	-
Lime Storage Silo 2	9.33	4.66	4.66	-	-	-	-	-	-
Granulating and Screening	0.70	0.35	0.35	-	-	-	-	-	-
Pig Storage Hoppers	18.66	9.33	9.33	-	-	-	-	-	-
Lime Storage Vessel 1	7.62	3.92	3.92	-	-	-	-	-	-
Lime Storage Vessel 3				-	-	-	-	-	-
Lime Storage Vessel 4				-	-	-	-	-	-
Lime Storage Vessel 5				-	-	-	-	-	-
Lime Storage Vessel 2	7.62	3.92	3.92	-	-	-	-	-	-
Lime Storage Vessel 6				-	-	-	-	-	-
Lime Storage Vessel 7				-	-	-	-	-	-
Flow Lime Blending Unit	19.62	10.03	10.03	-	-	-	-	-	-
Closed Vehicle Loading				-	-	-	-	-	-
Fugitive Emissions (Paved Roads)	1.15	0.23	0.06	-	-	-	-	-	-
Total PTE of Entire Source	<b>87.18</b>	<b>50.25</b>	<b>50.08</b>	-	-	-	-	-	-
Title V Major Source Thresholds	-	100	100	100	100	100	100	10	25
PSD Major Source Thresholds	250	250	250	250	250	250	250	-	-

<sup>1</sup>Under the Part 70 Permit program (40 CFR 70), PM<sub>10</sub> and PM<sub>2.5</sub>, not particulate matter (PM), are each considered as a "regulated air pollutant."  
<sup>2</sup>PM<sub>2.5</sub> listed is direct PM<sub>2.5</sub>.  
<sup>3</sup>Single highest source-wide HAP.

(a) FESOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants, and HAPs from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP).

(1) Criteria Pollutants

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

(A) PM<sub>10</sub> and PM<sub>2.5</sub>

In order to render the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permits) not applicable, the source shall comply with the following:

Unit	Control	Stack	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)
Lime Storage Vessels (LSV 1, LSV 3, LSV 4, LSV 5)	WB1	WB1	0.90	0.90
Lime Storage Vessels (LSV 2, LSV 6, LSV 7)	DF02-02	DF02-02	0.90	0.90

Compliance with these limits, combined with the limited potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> from all other emission units at this source, shall limit the source-wide total potential to emit of PM<sub>10</sub> and PM<sub>2.5</sub> to less than 100 tons per twelve (12) consecutive month period, each, and shall render the requirements of 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) PSD Minor Source – PM

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

Unit	Control	Stack	PM <sub>10</sub> (lb/hr)	PM <sub>2.5</sub> (lb/hr)
Lime Storage Vessels (LSV 1, LSV 3, LSV 4, LSV 5)	WB1	WB1	1.74	1.74
Lime Storage Vessels (LSV 2, LSV 6, LSV 7)	DF02-02	DF02-02	1.74	1.74

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

<b>Federal Rule Applicability Determination</b>
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Due to this proposed revision, federal rule applicability has been reviewed as follows:

**New Source Performance Standards (NSPS):**

- (a) The requirements of the New Source Performance Standard for Lime Manufacturing Plants, 40 CFR 60, Subpart HH and 326 IAC 12, are not included for this proposed revision, because this source operates a magnesium processing plant and is not a lime manufacturing plant as defined in 40 CFR 60.60.341.
- (b) The requirements of the New Source Performance Standard for Metallic Mineral Processing Plants, 40 CFR 60, Subpart LL and 326 IAC 12, are not included for this proposed revision, because this source operates a magnesium processing facility and magnesium is not included as a metallic mineral concentrate as defined in 40 CFR 60.381.
- (c) The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO and 326 IAC 12, are not included for this proposed revision, because this source operates a magnesium processing facility which is not one of the nonmetallic minerals or mixtures of nonmetallic minerals as defined in 40 CFR 60.671. U.S. EPA Region 3 Determination Control Number 0400016, authored by Michael Alushin and dated November 18, 2003, states "equipment used to process lime product is not subject to the New Source Performance Standards (NSPS) subpart OOO." Therefore, the lime processing is not subject to Subpart OOO.
- (d) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed revision.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants, 40 CFR 63.7080, Subpart AAAAA and 326 IAC 20-91, are not included for this proposed revision because this source does not operate a lime manufacturing plant as defined in 40 CFR 63.7143 and is not a major source of HAPs.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Primary Magnesium Refining, 40 CFR 63.9880, Subpart TTTTT, are not included for this proposed revision because this source is not a major source of HAPs.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Secondary Nonferrous Metals Processing Area Sources, 40 CFR 63.11462, Subpart TTTTTT are not included for this proposed revision because this source is not a secondary nonferrous metals processing facility as defined in 40 CFR 63.11472. A secondary nonferrous metals processing facility uses furnace melting operations to melt post-consumer nonferrous metal scrap to make products including bar, ingots, blocks, or metal powders.
- (h) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR Part 63), 326 IAC 14 and 326 IAC 20 included in the permit for this proposed revision.

**Compliance Assurance Monitoring (CAM):**

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

<b>State Rule Applicability Determination</b>
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- (a) 326 IAC 2-8-4 (FESOP)  
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-8 (FESOP). See PTE of the Entire Source After Issuance of the FESOP Revision Section above.
- (b) 326 IAC 2-2 (PSD) and 2-3 (Emission Offset)  
PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.
- (c) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, because the unlimited potential to emit of HAPs from the new units is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (d) 326 IAC 2-6 (Emission Reporting)  
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, LaPorte, or Lawrenceburg Township, Dearborn County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (e) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
  - (1) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (f) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
Due to this revision, the source is subject to the requirements of 326 IAC 6-4, because the paved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (g) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (h) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)  
Pursuant to 326 IAC 6-3-1(c), the lime storage vessels are not subject to the requirements of 326 IAC 6-3, because the lime storage vessels are subject to a particulate matter limitation specified

in 326 IAC 6.5 that is as stringent or more stringent than the particulate limitation established in IAC 326 6-3.

- (b) 326 IAC 6.5 (Particulate Emission Limitations Except Lake County)  
326 IAC 6.5 applies to sources or facilities located in Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne Counties. Sources specifically listed in the rule shall comply with the limitations in 326 IAC 6.5-2 through 326 IAC 6.5-10, as applicable. Sources not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10 shall comply with 326 IAC 6.5-1-2, if they have the potential to emit ten (10) tons or more of particulate matter (PM) and are not taking a limit of less than ten (10) tons of particulate matter (PM).

This source, located in Clark County, and has the potential to emit ten (10) tons or more of particulate matter (PM) and is not taking a limit of less than ten (10) tons of particulate matter (PM). Therefore, 326 IAC 6.5 applies and the requirements are included in the permit.

Therefore, pursuant to 6.5-1-2(a), PM emissions from the lime storage vessels shall not exceed seven hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

#### Compliance Determination and Monitoring Requirements

- (a) The Compliance Monitoring Requirements applicable to this proposed revision are as follows:

Emission Units	Control	Parameter	Frequency
Lime Storage Vessels LSV1, LSV3, LSV4, LSV5	Dust Collector (WB1)	Visible Emissions	Daily
Lime Storage Vessels LSV2, LSV6, LSV7	Dust Collector (DF02-2)	Visible Emissions	Daily

These monitoring conditions are necessary because the dust collectors for the lime storage vessels must operate properly to assure compliance with 326 IAC 2-2 (PSD) 326 IAC 6.5 (Particulate Emissions Limitations Except Lake County) and 326 IAC 2-8-4 (FESOP).

There are no other new or modified compliance requirements included with this revision.

#### Proposed Changes

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

- (1) IDEM OAQ has added new lime storage vessels in section A.2(e) and throughout section D.1
- (2) IDEM OAQ has revised the compliance monitoring requirements for the control units in sections D.1.7 and D.1.10.

#### Additional Changes

IDEM, OAQ made additional changes to the permit as described below in order to update the language to match the most current version of the applicable rule, to eliminate redundancy within the permit, and to provide clarification regarding the requirements of these conditions.

- (1) For this revision, IDEM OAQ has included IDEM's Master Agency Interest Identification (ID)

number of 14518 in the permit cover page signature box.

Operation Permit No.: F141-34546-00185 <b>Master Agency Interest ID.: 14518</b>	
Issued by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: March 11, 2015  Expiration Date: March 11, 2025

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

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

...

- (e) ~~Two (2) Lime Storage Vessels, identified as LSV1 and LSV2, constructed in 1994, with a combined capacity of 16,000 pounds per hour, and each having a storage capacity of 30,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.~~  
**Seven (7) Lime Storage Vessels, identified as LSV1 through LSV 7, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.**

Emission Unit	Year Constructed	Control	Stack
LSV1	1994	WB1	WB1
LSV2	1994	DF02-2	DF02-2
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

...

- (e) ~~Two (2) Lime Storage Vessels, identified as LSV1 and LSV2, constructed in 1994, with a combined capacity of 16,000 pounds per hour, and each having a storage capacity of 30,000 pounds, each controlled by one (1) of two (2) dust collectors for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.~~  
**Seven (7) Lime Storage Vessels, identified as LSV1 through LSV 7, constructed in 1994 and 2018, with a combined maximum throughput of 16,000 pounds per hour, and each having a storage capacity of 40,000 pounds or less, each controlled by dust collectors**



**for particulate control, identified as WB1 and DF02-2, constructed in 2002, and exhausting to stacks WB1 and DF02-2. Each dust collector has an exhaust air flow rate of 500 cfm.**

Emission Unit	Year Constructed	Control	Stack
LSV1	1994	WB1	WB1
LSV2	1994	DF02-2	DF02-2
LSV3	2018	WB1	WB1
LSV4	2018	WB1	WB1
LSV5	2018	WB1	WB1
LSV6	2018	DF02-2	DF02-2
LSV7	2018	DF02-2	DF02-2

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

#### D.1.1 PSD Minor Limit [326 IAC 2-2]

In order to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

Unit	Control	Stack	PM (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00
Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	2.13
Lime Receiving Silo 1 (S2)	CF2	CF2	2.13
Lime Granulating and Screening Unit (LG1 )	DF02-4-A	DF02-4-A	0.16 combined
Lime Granulating and Screening Unit (LG2)			
Pig Storage Hoppers (PS1-PS5)	CF3	CF3	4.26 combined
Lime Storage Vessels (LSV1, <b>LSV3, LSV 4, LSV 5</b> )	WB1	WB1	1.74
Lime Storage Vessels (LSV2, <b>LSV 6, LSV 7</b> )	DF02-2	DF02-2	1.74
Flow Lime Blending Unit (BCL)	DF02-4-B	DF02-4-B	4.48 combined
Vehicle Loading			

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than 250 tons per 12 consecutive month period, each, and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

#### D.1.2 FESOP Limit [326 IAC 2-2]

Pursuant to 326 IAC 2-8-4 and in order to render 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

Unit	Control	Stack	PM10 (pounds per hour)	PM2.5 (pounds per hour)
Magnesium Granulating Line 1 (MgL1)	C1	C1	1.00	1.00

Magnesium Granulating Line 2 (MgL2)	C2	C2	1.00	1.00
Magnesium Granulating Line 3 (MgL3)	C3	C3	1.00	1.00
Lime Receiving Silo 1 (S1)	CF1	CF1	1.065	1.065
Lime Receiving Silo 1 (S2)	CF2	CF2	1.065	1.065
Lime Granulating and Screening Unit (LG1 )	DF02-4-A	DF02-4-A	0.08 combined	0.08 combined
Lime Granulating and Screening Unit (LG2)				
Pig Storage Hoppers (PS1-PS5)	CF3	CF3	2.13 combined	2.13 combined
Lime Storage Vessels (LSV1, <b>LSV3, LSV 4, LSV 5</b> )	WB1	WB1	0.895	0.895
Lime Storage Vessels (LSV2, <b>LSV 6, LSV 7</b> )	DF02-2	DF02-2	0.895	0.895
Flow Lime Blending Unit (BCL)	DF02-4-B	DF02-4-B	2.29 combined	2.29 combined
Vehicle Loading				

Compliance with these limits, combined with the limited potential to emit PM10 and PM2.5 from all other emission units at the source, shall limit the source-wide total potential to emit of PM10 and PM2.5 to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Program) and 326 IAC 2-2 not applicable.

#### D.1.3 Particulate [326 IAC 6.5-2]

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County), the particulate matter emissions from the magnesium granulating lines (MgL1, MgL2, and MgL3), lime receiving silos (S1 and S2), lime granulating and screening units (LG1 and LG2), pig storage hoppers (PS1 through PS5), lime storage vessels (LSV1 ~~and LSV2~~ **through LSV 7**), flow lime blending (BCL),

#### D.1.6 Particulate Control

...

- (b) In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouses (CF1, CF2, DF02-4-A, CF3, WB1, DF02-2 and DF02-4-B) for particulate control shall be in operation and control emissions from the lime storage silos (S1, S2), the lime granulating and screening units (LG1, LG2), the pig storage hoppers (PS1–PS5), the lime storage vessels (LSV1, ~~LSV2~~ **through LSV 7**), the flow lime blending (BCL), and vehicle loading at each time the lime storage silos, lime granulating and screening units, pig storage hoppers, lime storage vessels, flow lime blending, and vehicle loading are in operation, respectively.

#### D.1.7 Visible Emissions Notations

- (a) Visible emission notations of the cyclones (C1, C2, C3) and the dust collectors (CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B) stack exhausts shall be performed once ~~every four hours~~ **per day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

#### D.1.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain records of once ~~every four (4) hours~~ **per day** visible emission notations of C1, C2, C3, CF1, CF2, DF02-4-A, CF3, WB1, DF02-2, and DF02-4-B stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

<b>Conclusion and Recommendation</b>
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Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 18 2018.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 141-40484-00185. The staff recommends to the Commissioner that this FESOP Significant Permit Revision be approved.

<b>IDEM Contact</b>
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- (a) If you have any questions regarding this permit, please contact Taylor Wade, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 233-0868 or (800) 451-6027, and ask for Taylor Wade or (317) 233-0868.
- (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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

Appendix A: Emission Calculations  
Summary of Potential to Emit

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit	Identifier	Unlimited Potential to Emit (tons/year)									
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAP	Worst-Case Individual HAP
Magnesium Granulating Line 1	MgL1	4,380	4,380	4,380	-	-	-	-	-	-	-
Magnesium Granulating Line 2	MgL2	4,380	4,380	4,380	-	-	-	-	-	-	-
Magnesium Granulating Line 3	MgL3	4,380	4,380	4,380	-	-	-	-	-	-	-
Lime Storage Silo 1	S1	91.54	91.54	91.54	-	-	-	-	-	-	-
Lime Storage Silo 2	S2	91.54	91.54	91.54	-	-	-	-	-	-	-
Granulating and Screening	LG1 and LG2	14.11	14.11	14.11	-	-	-	-	-	-	-
Pig Storage Hoppers	PS1-PS5	91.54	91.54	91.54	-	-	-	-	-	-	-
Lime Storage Vessel 1	LSV1	77.09	77.09	77.09	-	-	-	-	-	-	-
Lime Storage Vessel 3	LSV3	77.09	77.09	77.09	-	-	-	-	-	-	-
Lime Storage Vessel 4	LSV4	77.09	77.09	77.09							
Lime Storage Vessel 5	LSV5	77.09	77.09	77.09							
Lime Storage Vessel 2	LSV2	77.09	77.09	77.09							
Lime Storage Vessel 6	LSV6	77.09	77.09	77.09							
Lime Storage Vessel 7	LSV7	77.09	77.09	77.09							
Flow Lime Blending Unit	BCL	77.09	77.09	77.09	-	-	-	-	-	-	-
Closed Vehicle Loading	-	21.37	21.37	21.37	-	-	-	-	-	-	-
Paved Roads		1.15	0.23	0.06							
Total		14,067.96	14,067.04	14,066.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Emission Unit	Identifier	Limited Potential to Emit (tons/year)									
		PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHG as CO2e	Total HAP	Worst-Case Individual HAP
Magnesium Granulating Line 1	MgL1	4.38	4.38	4.38	-	-	-	-	-	-	-
Magnesium Granulating Line 2	MgL2	4.38	4.38	4.38	-	-	-	-	-	-	-
Magnesium Granulating Line 3	MgL3	4.38	4.38	4.38	-	-	-	-	-	-	-
Lime Storage Silo 1	S1	9.33	4.66	4.66	-	-	-	-	-	-	-
Lime Storage Silo 2	S2	9.33	4.66	4.66	-	-	-	-	-	-	-
Granulating and Screening	LG1 and LG2	0.70	0.35	0.35	-	-	-	-	-	-	-
Pig Storage Hoppers	PS1-PS5	18.66	9.33	9.33	-	-	-	-	-	-	-
Lime Storage Vessel 1	LSV1	7.62	3.92	3.92	-	-	-	-	-	-	-
Lime Storage Vessel 3	LSV3				-	-	-	-	-	-	-
Lime Storage Vessel 4	LSV4				-	-	-	-	-	-	-
Lime Storage Vessel 5	LSV5				-	-	-	-	-	-	-
Lime Storage Vessel 2	LSV2				-	-	-	-	-	-	-
Lime Storage Vessel 6	LSV6	7.62	3.92	3.92	-	-	-	-	-	-	-
Lime Storage Vessel 7	LSV7				-	-	-	-	-	-	-
Flow Lime Blending Unit	BCL	19.62	10.03	10.03	-	-	-	-	-	-	-
Closed Vehicle Loading	-				-	-	-	-	-	-	-
Paved Roads	-	1.15	0.23	0.06	-	-	-	-	-	-	-
Total	-	87.18	50.25	50.08	0.00	0.00	0.00	0.00	0.00	-	0.00

Note: the Flow Lime Blending Unit, BCL, and Closed Vehicle Loading both emit to the same control device and same exhaust stack. Therefore the limits for the units are a combined limit.

Note: Lime Storage Vessels (LSV1, LSV3, LSV4 and LSV5) all emit to the same control device and exhaust stack. Therefore, the limits for the units are a combined limit.

Note: Lime Storage Vessels (LSV2, LSV6 and LSV7) all emit to the same control device and exhaust stack. Therefore, the limits for the units are a combined limit.

## Appendix A Page 2 of 9

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

[illegible]

Appendix A: Emission Calculations  
Granulating Lines (MgL1, MgL2, MgL3)

Company Name: Magnesium Technologies Corp., dba Rossborough  
 Address: 205 State Road 104, Walkerton, Indiana 46574  
 Permit Number: 141-40484-00185  
 Permit Reviewer: Taylor Wade

Emission Unit ID	Annual Operating Hours	Capacity (lbs/hr)	Cyclone Efficiency	PM PTE (lb/hr)	PM PTE (tons/yr)	Uncontrolled PTE (tons/yr)
MgL1	8,760	1,000	99.9%	1.00	4.38	4,380
MgL2	8,760	1,000	99.9%	1.00	4.38	4,380
MgL3	8,760	1,000	99.9%	1.00	4.38	4,380

Cyclones have been determined to be integral to the process for the magnesium granulating lines.

Therefore, the potential to emit is calculated after control efficiency for 326 IAC 2-7 purposes.

Assumed all of the capacity is emitted as particulate emissions.

Assumed PM = PM10 = PM2.5 for PTE

Uncontrolled PTE is used for determining PSD applicability.

PTE = potential to emit

Methodology

PM PTE (lbs/hr) = Capacity (lbs/hr) \* (1 - Cyclone Efficiency)

PM PTE (tons/yr) = PM PTE (lbs/hr) \* 8,760 hrs/yr \* (1 ton/2,000 lbs)

Uncontrolled PTE (tons/yr) = Capacity (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Appendix A: Emission Calculations  
Lime Storage Silos (S1 and S2)

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit ID	Annual Operating Hours	Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	PM PTE (lbs/hr)	PM PTE (tons/yr)	Control Efficiency	Controlled PM Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	PM PSD Minor Limit (lbs/hr)	PM PSD Minor Limit (tons/yr)	PM10 Limit (lbs/hr)	PM10 Limit (tons/yr)
Unloading Material (SCC 3-05-016-15)												
S1	8760	9.5	2.2	20.9	91.542	99%	0.21	0.92	2.13	9.33	1.065	4.6647
S2	8760	9.5	2.2	20.9	91.542	99%	0.21	0.92	2.13	9.33	1.065	4.6647

Emission Factors from AP-42, Chapter 11.17 Fifth Edition, Table 11.17-4 (E rating)

Assumed PM = PM10 = PM2.5 for PTE

PTE = potential to emit

PM PTE (lb/hr) = Capacity (tons/hr) \* Emission Factor (lbs-PM/ton processed)

PM PTE (tons/hr) = PM PTE (lb/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Controlled PM Emissions (lbs/hr) = PM PTE (lbs/hr) \* (1 - Control Efficiency)

Controlled PM Emissions (tons/yr) = PM PTE (tons/hr) \* (1 - Control Efficiency)

PM PSD Minor Limit (tons/yr) = PM PSD Minor Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

PM10 Limit (tons/yr) = PM2.5 Limit (tons/yr) = PM10 Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Appendix A: Emission Calculations  
Granulated Screening (LG1 and LG2)

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit ID	Annual Operating Hours	Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	PM PTE (lbs/hr)	PM PTE (tons/yr)	Control Efficiency	Controlled PM Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	PM PSD Minor Limit (lbs/hr)	PM PSD Minor Limit (tons/yr)	PM10 Limit (lbs/hr)	PM10 Limit (tons/yr)
Crushing Material (SCC 3-05-020-05)												
LG1	8760	4.75	0.039	0.185	0.811	99%	0.0019	0.0081				
LG2	8760	4.75	0.039	0.185	0.811	99%	0.0019	0.0081				
Screening Material (SCC 3-05-020-021)												
LG1	8760	4.75	0.3	1.43	6.24	99%	0.014	0.062				
LG2	8760	4.75	0.3	1.43	6.24	99%	0.014	0.062				
<b>Total</b>				<b>3.22</b>	<b>14.11</b>		<b>0.032</b>	<b>0.14</b>	<b>0.16</b>	<b>0.70</b>	<b>0.08</b>	<b>0.35</b>

Emission Factors from AP-42, Chapter 11.19.2 Fifth Edition, Table 11.19.2-2 (referred to by AP-42 Chapter 11.17 as more recent and representative for crushing, grinding, and screening operations.) (both E ratings)

Assumed PM = PM10 = PM2.5 for PTE

PTE = potential to emit

PM PTE (lb/hr) = Capacity (tons/hr) \* Emission Factor (lbs-PM/ton processed)

PM PTE (tons/hr) = PM PTE (lb/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Controlled PM Emissions (lbs/hr) = PM PTE (lbs/hr) \* (1 - Control Efficiency)

Controlled PM Emissions (tons/yr) = PM PTE (tons/hr) \* (1 - Control Efficiency)

PM PSD Minor Limit (tons/yr) = PM PSD Minor Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

PM10 Limit (tons/yr) = PM2.5 Limit (tons/yr) = PM10 Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)



Appendix A: Emission Calculations  
Pig Storage (PS1 - PS5)

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit ID	Annual Operating Hours	Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	PM PTE (lbs/hr)	PM PTE (tons/yr)	Control Efficiency	Controlled PM Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	PM PSD Minor Limit (lbs/hr)	PM PSD Minor Limit (tons/yr)	PM10 Limit (lbs/hr)	PM10 Limit (tons/yr)
Conveying Materials SCC 3-05-016-15									(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
PS1	8,760	1.9	2.2	4.18	18.31	99%	0.042	0.18				
PS2	8,760	1.9	2.2	4.18	18.31	99%	0.042	0.18				
PS3	8,760	1.9	2.2	4.18	18.31	99%	0.042	0.18				
PS4	8,760	1.9	2.2	4.18	18.31	99%	0.042	0.18				
PS5	8,760	1.9	2.2	4.18	18.31	99%	0.042	0.18				
<b>Total</b>		<b>9.5</b>		<b>20.90</b>	<b>91.54</b>		<b>0.21</b>	<b>0.92</b>	<b>4.26</b>	<b>18.66</b>	<b>2.13</b>	<b>9.33</b>

Emission Factors from AP-42, Chapter 11.17 Fifth Edition, Table 11.17-4 (E rating)  
Assumed PM = PM10 = PM2.5 for PTE

PTE = potential to emit

PM PTE (lb/hr) = Capacity (tons/hr) \* Emission Factor (lbs-PM/ton processed)

PM PTE (tons/yr) = PM PTE (lb/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Controlled PM Emissions (lbs/hr) = PM PTE (lbs/hr) \* (1 - Control Efficiency)

Controlled PM Emissions (tons/yr) = PM PTE (tons/yr) \* (1 - Control Efficiency)

PM PSD Minor Limit (tons/yr) = PM PSD Minor Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

PM10 Limit (tons/yr) = PM2.5 Limit (tons/yr) = PM10 Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Appendix A: Emission Calculations  
Lime Storage Vessels

Company Name: Magnesium Technologies Corp., dba Rossborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit ID	Control ID	Bottleneck Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	PM PTE (lbs/hr)	PM PTE (tons/yr)	Control Efficiency	Controlled PM Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	PM PSD Minor Limit (lbs/hr)	PM PSD Minor Limit (tons/yr)	PM10/PM 2.5 Limit (lbs/hr)	PM10/PM 2.5 Limit (tons/yr)
Conveying Material SCC 3-05-016-05									(lbs/hr)	(tons/yr)	(lbs/hr)	(tons/yr)
LSV1	WB1	8	2.2	17.6	77.09	99%	0.18	0.77	1.74	7.62	0.90	3.92
LSV3		8	2.2	17.6	77.09	99%	0.18	0.77				
LSV4		8	2.2	17.6	77.09	99%	0.18	0.77				
LSV5		8	2.2	17.6	77.09	99%	0.18	0.77				
LSV2		8	2.2	17.6	77.09	99%	0.18	0.77				
LSV6	DF02-2	8	2.2	17.6	77.09	99%	0.18	0.77	1.74	7.62	0.90	3.92
LSV7		8	2.2	17.6	77.09	99%	0.18	0.77				

Emission Factors from AP-42, Chapter 11.17 Fifth Edition, Table 11.17-4  
Assumed PM = PM10 = PM2.5 for PTE

PM PTE (lb/hr) = Capacity (tons/hr) \* Emission Factor (lbs-PM/ton processed)  
PM PTE (tons/hr) = PM PTE (lb/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)  
Controlled PM Emissions (lbs/hr) = PM PTE (lbs/hr) \* (1 - Control Efficiency)  
Controlled PM Emissions (tons/yr) = PM PTE (tons/hr) \* (1 - Control Efficiency)  
PM PSD Minor Limit (tons/yr) = PM PSD Minor Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)  
PM10 Limit (tons/yr) = PM2.5 Limit (tons/yr) = PM10 Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Appendix A: Emission Calculations  
Lime Blending and Loading

Company Name: Magnesium Technologies Corp., dba Rosssborough  
Address: 205 State Road 104, Walkerton, Indiana 46574  
Permit Number: 141-40484-00185  
Permit Reviewer: Taylor Wade

Emission Unit ID	Annual Operating Hours	Capacity (tons processed per hour)	Emission Factor (lbs of PM per ton of material processed)	PM PTE (lbs/hr)	PM PTE (tons/yr)	Control Efficiency	Controlled PM Emissions (lbs/hr)	Controlled PM Emissions (tons/yr)	PM PSD Minor Limit (lbs/hr)	PM PSD Minor Limit (tons/yr)	PM10 Limit (lbs/hr)	PM10 Limit (tons/yr)
Conveying Material SCC 3-05-016-15												
BCL	8,760	8	2.2	17.60	77.09	99%	0.18	0.77				
Loading Material SCC 3-05-016-026												
Closed Vehicle Loading	8,760	8	0.61	4.88	21.37	99%	0.049	0.21				
Total									4.48	19.62	2.29	10.03

Emission Factors from AP-42, Chapter 11.17 Fifth Edition, Table 11.17-4 (E rating for BCL and D rating for loading)

Assumed PM = PM10 = PM2.5 for PTE

PTE = potential to emit

PM PTE (lb/hr) = Capacity (tons/hr) \* Emission Factor (lbs-PM/ton processed)

PM PTE (tons/hr) = PM PTE (lb/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

Controlled PM Emissions (lbs/hr) = PM PTE (lbs/hr) \* (1 - Control Efficiency)

Controlled PM Emissions (tons/yr) = PM PTE (tons/hr) \* (1 - Control Efficiency)

PM PSD Minor Limit (tons/yr) = PM PSD Minor Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

PM10 Limit (tons/yr) = PM2.5 Limit (tons/yr) = PM10 Limit (lbs/hr) \* Annual Operating Hours \* (1 ton/2,000 lbs)

**Appendix A: Emission Calculations**  
**Fugitive Dust Emissions - Paved Roads**

Appendix A Page 9 of 9

**Company Name:** Magnesium Technologies Corp., dba Rossborough  
**Source Address:** 205 State Road 104, Walkerton, Indiana 46574  
**Permit Number:** 141-40484-00185  
**Reviewer:** Taylor Wade

**Paved Roads at Industrial Site**

The following calculations determine the amount of emissions created by paved roads, based on 8,760 hours of use and AP-42, Ch 13.2.1 (1/2011).

Vehicle Information (provided by source)

Type	Maximum number of vehicles per day	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	10.0	1.0	10.0	39.0	390.0	500	0.095	0.9	345.6
Vehicle (leaving plant) (one-way trip)	10.0	1.0	10.0	39.0	390.0	500	0.095	0.9	345.6
<b>Totals</b>			<b>20.0</b>		<b>780.0</b>			<b>1.9</b>	<b>691.3</b>

Average Vehicle Weight Per Trip = 39.0 tons/trip  
Average Miles Per Trip = 0.09 miles/trip

Unmitigated Emission Factor,  $E_f = [k * (sL)^{0.91} * (W)^{1.02}]$  (Equation 1 from AP-42 13.2.1)

	PM	PM10	PM2.5	
where k =	0.011	0.0022	0.00054	lb/VMt = particle size multiplier (AP-42 Table 13.2.1-1)
W =	39.0	39.0	39.0	tons = average vehicle weight (provided by source)
sL =	9.7	9.7	9.7	g/m <sup>2</sup> = silt loading value for paved roads at iron and steel production facilities - Table 13.2.1-3)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E * [1 - (p/4N)]$  (Equation 2 from AP-42 13.2.1)

Mitigated Emission Factor,  $E_{ext} = E_f * [1 - (p/4N)]$   
where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.1-2)  
N = 365 days per year

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	3.650	0.730	0.1792	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	3.337	0.667	0.1638	lb/mile

Process	Mitigated PTE of PM (Before Control) (tons/yr)	Mitigated PTE of PM10 (Before Control) (tons/yr)	Mitigated PTE of PM2.5 (Before Control) (tons/yr)
Vehicle (entering plant) (one-way trip)	0.58	0.12	0.03
Vehicle (leaving plant) (one-way trip)	0.58	0.12	0.03
<b>Totals</b>	<b>1.15</b>	<b>0.23</b>	<b>0.06</b>

**Methodology**

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] \* [Maximum trips per day (trip/day)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/day) = [Maximum trips per day (trip/day)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per day (trip/day)]  
Unmitigated PTE (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Unmitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (Before Control) (tons/yr) = [Maximum one-way miles (miles/yr)] \* [Mitigated Emission Factor (lb/mile)] \* (ton/2000 lbs)  
Mitigated PTE (After Control) (tons/yr) = [Mitigated PTE (Before Control) (tons/yr)] \* [1 - Dust Control Efficiency]

**Abbreviations**

PM = Particulate Matter  
PM10 = Particulate Matter (<10 um)  
PM2.5 = Particulate Matter (<2.5 um)  
PTE = Potential to Emit



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

November 29, 2018

Mr. David Hostetler  
Magnesium Technologies corporation dba Rossborough  
P. O. Box 175  
Walkerton, IN 46574

Re: Public Notice  
Magnesium Technologies Corporation  
dba Rossborough  
Permit Level: FESOP-Significant Revision  
Permit Number: 141-40484-00185

Dear Mr. Hostetler:

Enclosed is a copy of your draft FESOP – Significant Revision, 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 South Bend Tribune in South Bend, Indiana publish the abbreviated version of the public notice no later than December 3, 2018. 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 Walkerton Lincoln Township Public Library, 406 Adams Street in Walkerton, Indiana 46574-1296. 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 Taylor Wade 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 3-0868 or dial (317) 233-0868.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permits Branch  
Office of Air Quality

Enclosures  
PN Applicant Cover Letter 1/9/2017



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Governor

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Commissioner

### ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 29, 2018

South Bend Tribune  
225 West Colfax Avenue  
South Bend, IN 46626

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Magnesium Technologies Corporation, dba Rossborough, St. Joseph 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 December 3, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 Vicki Biddle at 800-451-6027 and ask for extension 3-6867 or dial 317-233-6867.

Sincerely,

*Vicki Biddle*

Vicki Biddle  
Permit Branch  
Office of Air Quality

Permit Level: FESOP – Significant Permit Revision  
Permit Number: 141-40484-00185

Enclosure

PN Newspaper Letter 8/22/2018



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

November 29, 2018

To: Walkerton Lincoln Township Public Library

From: Jenny Acker, Branch Chief  
Permits Branch  
Office of Air Quality

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

**Applicant Name: Magnesium Technologies Corporation  
dba Rossborough**

**Permit Number: 141-40484-00185**

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 1/9/2017



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

### Notice of Public Comment

**November 29, 2018**

**Magnesium Technologies Corporation, dba Rossborough  
141-40484-00185**

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](mailto: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 Letter 1/9/2017



# Mail Code 61-53

IDEM Staff	VBIDDLE 11/29/2018 Magnesium Technologies Corp. dba Rossborough 141-40484-00185 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:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Dave Hostetler Magnesium Technologies Corp dba Rossborough PO Box 175 Walkerton IN 465740175 (Source CAATS)										
2		Mr. Wayne Falda South Bend Tribune 255 W Colfax Ave South Bend IN 46626 (Affected Party)										
3		Walkerton Lincoln Twp Public Library 406 Adams St. Walkerton IN 46574-1296 (Library)										
4		Walkerton Town Council 510 Roosevelt Rd. Walkerton IN 56574 (Local Official)										
5		St. Joseph County Board of Commissioners 227 West Jefferson Blvd, South Bend IN 46601 (Local Official)										
6		Mark Espich St. Joseph County Health Department 227 W Jefferson Blvd South Bend IN 46601 (Health Department)										
7		Matt Thomas GHD Services, Inc. 6520 Corporate Drive Indianapolis IN 46278 (Consultant)										
8		Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)										
9		Mr. Roger Schneider The Goshen News 114 S. Main St Goshen IN 46526 (Affected Party)										
10												
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12												
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