

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Indiana Steel and Wire
2200 East Jackson Street
Muncie, Indiana 47307**

(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.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T035-6570-00048	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary steel wire and cable manufacturing source.

Responsible Official: Laurens S. Beyland
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
SIC Code: 3315, 3398, 3471, 3479
County Location: Delaware
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

(a) Hot dip galvanizing:

- (1) #1 Hot Dip Galvanizing Line rated at 1.79 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 6, exhausting at one (1) stack identified as S/V7; one (1) hot dip galvanizing kettle utilizing 0.06 tons of galfan (mixture of zinc and aluminum) per hour and identified as Unit 10, exhausting at two (2) stacks identified as S/V13 and S/V14; one (1) hot dip galvanizing kettle utilizing 0.11 tons of zinc per hour and identified as Unit 11, exhausting at one (1) stack identified as S/V15; and a steel wire petroleum based charcoal wipe.
- (2) #2 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 3 exhausting at one (1) stack identified as S/V3; one (1) hot dip galvanizing kettle utilizing 0.14 tons of zinc per hour and identified as Unit 8, exhausting at one (1) stack identified as S/V11; and a steel wire petroleum based charcoal wipe.
- (3) #3 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 4 exhausting at one (1) stack identified as S/V4; one (1) hot dip galvanizing kettle utilizing 0.14 tons of zinc per hour and identified as Unit 9, exhausting at one (1) stack identified as S/V12; and a steel wire petroleum based charcoal wipe.

- (b) One (1) Electrogalvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 5, exhausting at two (2) stacks identified as S/V5 and S/V6; and one (1) zinc electroplating station.

- (c) #3 Oil Tempering Line rated at 1.75 tons of steel wire per hour, including one (1) quench oil tank identified as Unit 7 exhausting at three (3) stacks identified as S/V 8, S/V 9 and S/V10.
- (d) Two (2) natural gas fired boilers identified as Boiler 1, constructed in 1955 with a maximum heat input rate of 26 million British thermal units (MMBtu) per hour, and Boiler 3, constructed in 1975 with a maximum heat input rate of 33.5 MMBtu per hour. Each boiler has the capability of firing No. 2 distillate oil as an alternative fuel, and each boiler exhausts to one (1) stack respectively identified as S/V1 and S/V2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Asbestos abatement projects regulated by 326 IAC 14-10.
- (c) Pebble lime storage silo with a 30 ton storage capacity, with particulate matter controlled by a baghouse, exhausting at one (1) stack.
- (d) One (1) electric arc furnace (EAF) with a maximum melt capacity of 100 pounds of metal per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) 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 Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

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

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

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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

B.6 Severability [326 IAC 2-7-5(5)]

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

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

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or

- (3) Denial of a permit renewal application.
- (b) 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.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

- (5) Any insignificant activity that has been added without a permit revision; and
- (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, 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;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (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, OAM, 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 Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 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 materials of substantial economic value.

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

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination

[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, 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 in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

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

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

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

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

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

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
- (2) The Permittee, *and* IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM, 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 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

The total source potential to emit of volatile organic compounds (VOC), particulate matter (PM), PM with an aerodynamic diameter less than or equal to 10 microns (PM-10), oxides of nitrogen (NO_x), and sulfur dioxide (SO₂) are each less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

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

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

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

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

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

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

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements;
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement 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, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, 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 written request for records to the Permittee, the Permittee shall furnish the records to the within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (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, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Hot dip galvanizing:
- (1) #1 Hot Dip Galvanizing Line rated at 1.79 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 6, exhausting at one (1) stack identified as S/V7; one (1) hot dip galvanizing kettle utilizing 0.06 tons of galfan (mixture of zinc and aluminum) per hour and identified as Unit 10, exhausting at two (2) stacks identified as S/V13 and S/V14; one (1) hot dip galvanizing kettle utilizing 0.11 tons of zinc per hour and identified as Unit 11, exhausting at one (1) stack identified as S/V15; and a steel wire petroleum based charcoal wipe.
 - (2) #2 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 3 exhausting at one (1) stack identified as S/V3; one (1) hot dip galvanizing kettle utilizing 0.14 tons of zinc per hour and identified as Unit 8, exhausting at one (1) stack identified as S/V11; and a steel wire petroleum based charcoal wipe.
 - (3) #3 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 4 exhausting at one (1) stack identified as S/V4; one (1) hot dip galvanizing kettle utilizing 0.14 tons of zinc per hour and identified as Unit 9, exhausting at one (1) stack identified as S/V12; and a steel wire petroleum based charcoal wipe.
- (b) One (1) Electrogalvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 5, exhausting at two (2) stacks identified as S/V5 and S/V6; and one (1) zinc electroplating station.
- (c) #3 Oil Tempering Line rated at 1.75 tons of steel wire per hour, including one (1) quench oil tank identified as Unit 7 exhausting at three (3) stacks identified as S/V 8, S/V 9 and S/V10.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #1 Hot Dip Galvanizing Line shall not exceed 6.4 pounds per hour when operating at a process weight rate of 1.8 tons of steel wire per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #2 Hot Dip Galvanizing Line shall not exceed 7.4 pounds per hour when operating at a process weight rate of 2.3 tons of steel wire per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #3 Hot Dip Galvanizing Line shall not exceed 7.4 pounds per hour when operating at a process weight rate of 2.3 tons of steel wire per hour.
- (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as the #3 Oil Tempering Line shall not exceed 6.0 pounds per hour when operating at a process weight rate of 1.75 tons of steel wire per hour.

- (e) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

D.1.3 Visible Emissions Notations

- (a) Daily visible emission notations of each process line's exhaust stack(s) shall be performed during normal daylight operations when each facility is in operation and 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of daily visible emission notations of each process line's exhaust stack(s).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

There are no specific reporting requirements for these facilities.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (d) Two (2) natural gas fired boilers identified as Boiler 1, constructed in 1955 with a maximum heat input rate of 26 million British thermal units (MMBtu) per hour, and Boiler 3, constructed in 1975 with a maximum heat input rate of 33.5 MMBtu per hour. Each boiler has the capability of firing No. 2 distillate oil as an alternative fuel, and each boiler exhausts to one (1) stack respectively identified as S/V1 and S/V2.

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

D.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from each boiler during distillate oil fuel firing shall not exceed five tenths (0.5) pounds per MMBtu heat input.

D.2.2 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating), the PM emissions from each boiler shall not exceed eight tenths (0.8) pounds per MMBtu heat input, determined as the lesser of the value *Pt* computed with the following formula:

$$Pt = (C*a*h) / (76.5 * Q^{0.75} * N^{0.25})$$

where: *Pt* = pounds of PM emitted per MMBtu heat input (lb/MMBtu)
C = maximum ground level concentration at critical wind speed (50 µg/m³)
a = plume rise factor
h = stack height (ft)
Q = total source operating capacity (MMBtu/hr)
N = number of stacks

or eight tenths (0.8) pounds per MMBtu heat input.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test these facilities by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Sulfur Dioxide Emissions and Sulfur Content

Compliance with the SO₂ limit specified in Condition D.2.1 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-3-4, the Permittee shall demonstrate that the No 2 fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
- (1) Providing vendor analysis of fuel delivered, if accompanied by a certification;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
- (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

- (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (3) Compliance or noncompliance shall be determined using a calendar month average sulfur dioxide emission rate in pounds per million Btu, unless a shorter averaging time or alternate averaging methodology is specified for the source.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boilers using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-2.1.
- (c) A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

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

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of each boiler's exhaust stack shall be performed during normal daylight operations when the facilities are in operation, and burning No. 2 distillate fuel oil and 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

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

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (6) below. The fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
 - (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and

- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the Boiler 1 and Boiler 3 stack's exhaust when burning No. 2 distillate fuel oil.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.7 Reporting Requirements

Using the form provided the Permittee shall either:

- (a) Certify that natural gas was fired in Boiler 1 and Boiler 3 at all times during the reporting period; or
- (b) Report the number of days during the reporting period that an alternate fuel, as No.2 distillate oil, was burned.
- (c) This form shall be submitted with the Semi-annual Compliance Report required by Section C - General Reporting Requirements of this permit.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

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:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

This form consists of 2 pages Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A
Page 2 of 2

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

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

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

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel
From To

(can omit boiler affected if only one gas boiler at this plant)

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

Signature:

Printed Name:

Title/Position:

Date:

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

**PART 70 OPERATING PERMIT
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Technical Support Document (TSD) for a Part 70 Operating Permit and
Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Indiana Steel and Wire
Source Location: 2200 East Jackson Street, Muncie, IN 47307
County: Delaware
SIC Code: 3315, 3398, 3471, 3479
Operation Permit No.: T035-6570-00048
Permit Reviewer: Michael Hirtler/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Indiana Steel and Wire relating to the operation of a steel wire and cable manufacturing source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Hot dip galvanizing:
 - (1) #2 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 3 exhausting at one (1) stack identified as S/V3; one (1) hot dip galvanizing kettle utilizing 0.1 tons of zinc per hour and identified as Unit 8, exhausting at one (1) stack identified as S/V11; and a steel wire petroleum based charcoal wipe.
 - (2) #3 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 4 exhausting at one (1) stack identified as S/V4; and one (1) hot dip galvanizing kettle utilizing 0.1 tons of zinc per hour and identified as Unit 9, exhausting at one (1) stack identified as S/V12; and a steel wire petroleum based charcoal wipe.
- (b) One (1) Electrogalvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 5, exhausting at two (2) stacks identified as S/V5 and S/V6; and one (1) zinc electroplating station.
- (c) Two (2) natural gas fired boilers identified as Boiler 1, constructed in 1955 with a maximum heat input rate of 26 million British thermal units (MMBtu) per hour, and Boiler 2, constructed in 1975 with a maximum heat input rate of 33.5 MMBtu per hour. Each boiler has the capability of firing No. 2 distillate oil as an alternative fuel, and each boiler exhausts to one (1) stack respectively identified as S/V1 and S/V2.

Unpermitted Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

- (a) #1 Hot Dip Galvanizing Line rated at 1.79 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 6, exhausting at one (1) stack identified as S/V7; one (1) hot dip galvanizing kettle utilizing 0.06 tons of galfan (mixture of zinc and aluminum) per hour and identified as Unit 10, exhausting at two (2) stacks identified as S/V13 and S/V14; one (1) hot dip galvanizing kettle utilizing 0.06 tons of zinc per hour and identified as Unit 11, exhausting at one (1) stack identified as S/V15; and a steel wire petroleum based charcoal wipe.
- (b) #3 Oil Tempering Line rated at 1.75 tons of steel wire per hour, including one (1) quench oil tank identified as Unit 7 exhausting at three (3) stacks identified as S/V 8, S/V 9 and S/V10.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

All unpermitted emission units and pollution control equipment at the source are reviewed under the ENSR process.

There are no new emission units under ENSR during this review.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, including nineteen (19) natural gas fired steel wire heat treating furnaces, at a combined maximum heat input rate of 54.05 MMBtu per hour. This includes fifteen (15) steel wire heat treating furnaces on the steel wire process lines that utilize molten lead at a combined maximum usage rate of 85 pounds of lead per hour.
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (e) Closed loop heating and cooling systems.
- (f) Noncontact cooling tower systems with either of the following:
 - (1) Natural draft cooling towers not regulated under a NESHAP.
 - (2) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

- (h) Heat exchanger cleaning and repair.
- (i) Asbestos abatement projects regulated by 326 IAC 14-10.
- (j) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (k) Other emergency equipment as follows: stationary fire pumps.
- (l) Anode assembly process.
- (m) Dressing operations and handling of lead dross.
- (n) Leach plant.
- (o) Wastewater treatment system and wastewater treatment operations laboratory.
- (p) Groundwater remediation treatment system.
- (q) Hydrochloric acid storage tank.
- (r) Pebble lime storage silo with a 30 ton storage capacity, with particulate matter controlled by a baghouse, exhausting at one (1) stack.
- (s) Two (2) #2 fuel oil storage tanks, each with a capacity of 30,000 gallons.
- (t) Maintenance cleaning solvents.
- (u) Wire drawing electrical weld of wire.
- (v) Electroform laboratory.
- (w) Research laboratory plating line.
- (x) Atmosphere generators.
- (y) Cleaning of soap powders by vacuum truck.
- (z) Asphalt coating of steel wire.
- (aa) Cleaning house sulfuric acid exhaust.
- (bb) One (1) electric arc furnace (EAF) with a maximum melt capacity of 100 pounds of metal per hour.
- (cc) Two (2) propane storage tanks, each with a capacity of 30,000 gallons.

Existing Approvals

The source has been operating under the following approvals:

- (a) Registration No. 18-06-81-0152, issued January 22, 1981.

Equipment removed from source covered under Registration No. 18-06-81-0152, issued January 22, 1981:

- (a) Five (5) natural gas fired steel wire heat treating furnaces, including #3 patent anneal wire patenting process furnace, #3 patent anneal lead process furnace, #2 oil temper air process furnace, #2 oil temper lead process furnace, and the electroform lead process furnace.
- (b) Copper electroplating operations.
- (c) One (1) natural gas fired boiler, with the capability of firing No. 2 distillate oil as an alternative fuel, with a maximum heat input rate of 31 million British thermal units (MMBtu) per hour.

Part 70 permits consolidate all applicable air pollution control requirements into one permit, inclusive of applicable operating conditions contained in any approval listed above. This Part 70 permit includes provisions that ensure that compliance with these requirements can be determined.

Enforcement Issue

- (a) IDEM is aware that the unpermitted emission units and pollution control equipment listed above have been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

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

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

An administratively complete Part 70 permit application for the purposes of this review was received on October 29, 1996. Additional information was received on February 23, 1998.

A notice of completeness letter was mailed to Indiana Steel and Wire on October 29, 1996.

Emission Calculations

The total potential and allowable emissions for units covered under Enhanced New Source Review (ENSR) are as follows:

(1) #3 Oil Tempering Line:

Indiana Permit Allowable Emissions Definition for #3 Oil Tempering Line installed in 1977 (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable	Emissions	Potential	Emissions
	(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
PM	143.3*	26.1*	46.0	8.4
SO ₂	---	---	46.0	8.4
VOC	---	---	0	0
CO	---	---	0	0
NOx	---	---	0	0
Single HAP	---	---	0	0
Combination of HAPs	---	---	0	0

* Extrapolated from the pound per hour allowable limit determined at 326 IAC 6-3-2.

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See attached spreadsheets for detailed calculations (eight (8) pages).
- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of particulate matter (PM) are less than 25 tons per year, but greater than 25 pounds per day. Therefore, pursuant to 326 IAC 2-1, a registration is required.

(2) #1 Hot Dip Galvanizing Line:

Indiana Permit Allowable Emissions Definition for #1 Hot Dip Galvanizing Line installed in 1989 (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable	Emissions	Potential	Emissions
	(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
PM	145.4*	26.5*	53.5	9.8
SO ₂	---	---	0	0
VOC	---	---	0	0
CO	---	---	0	0
NOx	---	---	0	0
Single HAP	---	---	162.7	29.7
Combination of HAPs	---	---	162.7	29.7

* Extrapolated from the pound per hour allowable limit determined at 326 IAC 6-3-2.

- (a) Allowable emissions are determined from the applicability of rule 326 IAC 6-3. See attached spreadsheets for detailed calculations (eight (8) pages).
- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of particulate matter (PM) are less than 25 tons per year, but greater than 25 pounds per day. Therefore, pursuant to 326 IAC 2-1, a registration is required.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. However, the installation of this line pre-dates the permit requirement for HAPs and, therefore, a construction permit pursuant to 326 IAC 2-1 is not required.

See Appendix A of this document for detailed emissions calculations (eight (8) pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO ₂	greater than 100, less than 250
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
hydrochloric acid (HCl)	greater than 10
lead compounds	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of sulfur dioxide (SO₂) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the OAM 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	9.3
PM-10	9.3
SO ₂	0.1
VOC	44.8
CO	4.4
HAP (specify)	31.9
NO _x	15.6

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

Process/facility	Limited Potential to Emit (PTE) (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
#3 Oil Tempering Line	8.4	8.4	0.0	0.0	0.0	0.0	0.0	0.0
#1 Hot Dip Galvanizing Line	9.8	9.8	0.0	14.1	0.0	0.0	29.7	29.7
#2 Hot Dip Galvanizing Line	2.2	2.2	0.0	23.4	0.0	0.0	48.8	48.8
#3 Hot Dip Galvanizing Line	2.2	2.2	0.0	23.4	0.0	0.0	48.8	48.8
Electrogalvanizing Line	0.0	0.0	0.0	0.0	0.0	0.0	79.5	79.5
Boiler 1	1.6	1.6	56.9	0.3	4.0	16.2	0.0	0.0
Boiler 2	2.1	2.0	72.3	0.4	5.1	20.5	0.0	0.0
Natural Gas Fired Process Furnaces*	2.8	2.8	0.1	1.4	5.0	23.6	0.0	0.0
Electric Arc Furnace*	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0
Pebble Lime Storage Silo*	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions	31.1	31.0	129.3	63.0	14.1	60.3	206.8	206.8

* Insignificant Activities

County Attainment Status

The source is located in Delaware County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Delaware County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

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

Federal Rule Applicability

- (a) 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

Boiler 1, constructed in 1955 and rated at 26.0 MMBtu per hour heat input, and Boiler 2, constructed in 1975 and rated at 33.5 MMBtu per hour, are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.40c through 60.48c, Subpart Dc) because each facility was constructed prior to the rule applicability date of June 9, 1989.

- (b) 40 CFR Part 60, Subpart AA (Standards of Performance for Steel Plants: Electric Arc Furnaces Constructed After October 21, 1974, and On or Before August 17, 1983)

The electric arc furnace (EAF), rated at 100 pounds of metal melted per hour, is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.270 through 60.276, Subpart AA) because the source is not a steel plant.

- (c) 40 CFR Part 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984)

The two (2) 30,000 gallon No. 2 fuel oil storage tanks (insignificant activities) are not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b through 60.117b, Subpart Kb) because they were installed in 1955 and modified in 1973 when the tank contents were changed from the initially held No. 6 fuel oil to the current No. 2 fuel oil, and these dates are prior to the rule applicability date of July 23, 1984.

- (d) There are currently no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, applicable to this source. It is noted, however, that 40 CFR Part 63, Subpart CCC (National Emission Standards for Hazardous Air Pollutants for Steel Pickling Facilities - HCl Process) was issued as a proposed rule by the U. S. Environmental Protection Agency on September 18, 1997. In its proposed state, the rule is applicable to all new and existing steel pickling operations using an acid solution in which 50 percent or more by weight of the acid in solution is hydrochloric acid (HCl) and the source is a major HAP source. As proposed, the source would not be subject to the rule because it uses less than 50 percent HCl (by weight) in its pickling solution.

However, if rule applicability changes upon final promulgation and the source becomes subject to Subpart CCC, the source will comply with the rule requirements.

State Rule Applicability - Entire Source

326 IAC 2-1-3.4 (New Source Toxics Control)

Pursuant to 326 IAC 2-1-3.4 (New Source Toxics Control), any new process or production unit, which in and of itself emits or has the potential to emit (PTE) 10 tons per year of any HAP or 25 tons per year of the combination of HAPs, and is constructed or reconstructed after July 27, 1997, must be controlled using technologies consistent with Maximum Achievable Control Technology (MACT). The source was constructed in 1955, with additional equipment installed in 1977 and 1989. Both dates are prior to the July 27, 1997 rule applicability date. Therefore, the requirements of this rule do not apply to this source.

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

This steel wire and cable manufacturing source is not a major stationary source (i.e., it is a minor stationary source) because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of SO₂. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

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. Observances of visible emissions crossing property lines may be refuted by factual data expressed in 326 IAC 6-4-2 (1), (2), or (3).

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

Boiler 1, constructed in 1955 and rated at 26.0 million Btu per hour (MMBtu/hr) heat input, and Boiler 2, constructed in 1975 and rated at 33.5 MMBtu/hr heat input, are each subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county and existing and operating prior to September 21, 1983, shall limit particulate matter (PM) emissions according to the equation at 326 IAC 6-2-3 as follows:

$$Pt = (C*a*h) / (76.5* Q^{0.75} * N^{0.25})$$

where: Pt = pounds of PM emitted per MMBtu heat input (lb/MMBtu)
C = maximum ground level concentration at critical wind speed (50 $\mu\text{g}/\text{m}^3$)
a = plume rise factor
h = stack height (ft)
Q = total source operating capacity (MMBtu/hr)
N = number of stacks

For Boiler 1, which was constructed in 1955:

$$Pt = (50*0.67*66) / (76.5* 26^{0.75} * 1^{0.25}) = 2.51 \text{ lb/MMBtu}; \text{ however, pursuant to 326 IAC 6-2-3(d), Pt shall not exceed } 0.8 \text{ lb/MMBtu.}$$

For Boiler 2, which was constructed in 1975:

$$Pt = (50*0.67*66) / (76.5* (26+33.5)^{0.75} * 2^{0.25}) = 1.13 \text{ lb/MMBtu}; \text{ however, pursuant to 326 IAC 6-2-3(d), Pt shall not exceed } 0.8 \text{ lb/MMBtu.}$$

Boilers 1 and 2 shall comply with the allowable PM emission limit of 0.8 lb/MMBtu (see TSD Appendix A , pages 6 and 7 of 8, for detailed calculations).

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2 (Process Operations), particulate matter (PM) from tempering and hot dip galvanizing of steel wire, and from the use of the electric arc furnace and the pebble lime storage silo (each as an insignificant activity) shall be limited according to the following:

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

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

Each process operation will comply with the allowable emission limit of 326 IAC 6-3-2 (see TSD Appendix A (eight (8) pages).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule requires all facilities with a potential to emit (PTE) twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide (SO₂) to comply with the emission limitations and test compliance methods stated in the rule. The PTE SO₂ from the 26.0 million Btu/hr boiler (Boiler 1) and the 33.5 million Btu/hr boiler (Boiler 2) is in excess of 25 tons per year for each boiler due to No. 2 fuel oil firing. Therefore, each facility shall be limited to 0.5 pounds SO₂ per million Btu heat input for distillate oil combustion.

This equates to a No. 2 fuel oil sulfur content limit of 0.5% (weight). Therefore, the sulfur content of the No. 2 fuel oil must be less than or equal to 0.5% in order to comply with this rule. The source will comply with this rule by using No. 2 fuel oil with a sulfur content of 0.5% or less (see TSD Appendix A, eight (8) pages for detailed calculations).

326 IAC 7-2-1 (Sulfur Dioxide Reporting Requirements)

This source is subject to 326 IAC 7-2-1 (Reporting Requirements). This rule requires the source to submit to the Office of Air Management (OAM) upon request records of sulfur content, heat content, fuel consumption, and sulfur dioxide emission rates for the combustion unit on a calendar-month average. The source will maintain records to be produced upon request by OAM.

326 IAC 8-1-6 (New Facilities; General VOC Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a PTE VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. Only the #1 Hot Dip Galvanizing and #3 Oil Tempering Lines were installed after the January 1, 1980 applicability date. However, neither these lines, nor any other facility at this source has a PTE VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 is not applicable to this source.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-1(e), *Applicability*, the requirements of 326 IAC 8-4-6 do not apply to gasoline dispensing facilities that have a monthly gasoline throughput of less than ten thousand (10,000) gallons per month and were in existence prior to July 1, 1989. The 500 gallon gasoline storage tank and dispensing operation was installed at the source prior to July 1, 1989 and the source dispenses well below 10,000 gallons of gasoline per month. Therefore, the requirements of 326 IAC 8-4-6 do not apply to this source.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources commencing operation after October 7, 1974 and prior to January 1, 1980, located anywhere in the state, with potential solvent VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source was constructed before 1974 and it does not have potential solvent VOC emissions at, or in excess of 100 tons per year; therefore, this rule does not apply.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, on and after October 1, 1995 stationary vessels used to store volatile organic liquids (VOL) must comply with the requirement of the rule if located in Clark, Floyd, Lake or Porter Counties. This rule is not applicable to this source since it is located in Delaware County.

No other rules pursuant to 326 IAC 8 apply to this source.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. The #3 Oil Tempering Line; #1, #2 and #3 Hot Dip Galvanizing Lines; Electrogalvanizing Line; and Boilers 1 and 2 have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emission notations of the process lines' exhaust stacks and boilers' exhaust stacks shall be performed during normal daylight operations when each facility is in operation. 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
 - (f) Compliance with these conditions will ensure compliance with 326 IAC 2-7 (Part 70), 326 IAC 5 (Visibility) and 326 IAC 6-3 (Process Operations).

These monitoring conditions are necessary because the steel wire oil tempering and galvanizing processes, and the two (2) boilers, must each operate properly to ensure compliance with 326 IAC 5 (Visibility), 326 IAC 6-2-3 (Particulate Emissions Limitations for Sources of Indirect Heating), 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.

- (b) See attached calculations for detailed air toxic calculations (see TSD Appendix A , eight (8) pages, for detailed calculations).

Conclusion

The operation of this steel wire and cable manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T035-6570-00048**.

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

Addendum to the
Technical Support Document for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Name: Indiana Steel and Wire
Source Location: 2200 East Jackson Street, Muncie, IN 47307
County: Delaware
SIC Code: 3315, 3398, 3471, 3479
Operation Permit No.: T035-6570-00048
Permit Reviewer: Michael Hirtler/EVP

On May 11, 1998, the Office of Air Management (OAM) had a notice published in the Muncie Star Press, Muncie, Indiana, stating that Indiana Steel and Wire (IS&W) had applied for a Part 70 Operating Permit to operate a stationary steel wire and cable manufacturing source. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

On May 5, 1998, Indiana Steel and Wire submitted comments on the proposed Part 70 Operating Permit. The summary of the comments and corresponding responses follows. The page number citations for any changes made to the Part 70 permit refer to the proposed or draft version of the permit. Due to the number of changes made, the revised Part 70 Operating Permit will have different page numbers. The revised Part 70 Operating Permit Table of Contents, pages 2 through 3, should be consulted for the new page numbers to the revised conditions described below.

Comment #1:

Change the Responsible Official shown in Condition A.1 from Assad Nahvi to Laurens S. Beyland, the current IS&W President.

Response #1:

Condition A.1, page 4 of 37, is revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary steel wire and cable manufacturing source.

Responsible Official: ~~Assad Nahvi~~ **Laurens S. Beyland**
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
SIC Code: 3315, 3398, 3471, 3479
County Location: Delaware
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
 Minor Source under PSD Rules;
 Major Source, Section 112 of the Clean Air Act

Comment #2:

Condition A.2(a)(1). The permit should describe the hot dip galvanizing kettle for the #1 line as utilizing 0.11 tons of zinc per hour instead of 0.06 tons of zinc per hour. This utilization is consistent with the short term #1 line rating of 1.79 tons of steel wire per hour.

Condition A.2(a)(2). The permit should describe the hot dip galvanizing kettle for the #2 line as utilizing 0.14 tons of zinc per hour instead of 0.1 tons of zinc per hour. This utilization is consistent with the short term #2 line rating of 2.26 tons of steel wire per hour.

Condition A.2(a)(3). The permit should describe the hot dip galvanizing kettle for the #3 line as utilizing 0.14 tons of zinc per hour instead of 0.1 tons of zinc per hour. This utilization is consistent with the short term #3 line rating of 2.26 tons of steel wire per hour.

Condition A.2(d). The permit should describe Boiler 2 as Boiler 3, because IS&W refers to the boiler built in 1975 as Boiler 3. The previously designated Boiler 2, which was rated at 31 million British thermal units per hour and included as a registered unit in Registration No. 18-06-81-0152, issued January 22, 1981, has been taken out of service.

Condition D.1 and D.2 General Description: The same descriptive changes cited above should likewise be made to the facility descriptions provided in Conditions D.1 and D.2.

Response #2:

Condition A.2, page 4 of 37, and Sections D.1 and D.2, respectively pages 28 and 30 of 37, are revised to include the appropriate facility descriptions. Associated revisions to Appendix A to the TSD (emission rate computations, eight (8) pages) are also made and they are attached to this Addendum. Further, Condition D.1.1 is revised where applicable such that the allowable particulate matter emission rates are consistent with the revision to Appendix A to the TSD. The requested clarifications, which do not result in a modification to the existing equipment, are made as follows:

(a) Hot dip galvanizing:

- (1) #1 Hot Dip Galvanizing Line rated at 1.79 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 6, exhausting at one (1) stack identified as S/V7; one (1) hot dip galvanizing kettle utilizing 0.06 tons of galfan (mixture of zinc and aluminum) per hour and identified as Unit 10, exhausting at two (2) stacks identified as S/V13 and S/V14; one (1) hot dip galvanizing kettle utilizing ~~0.06~~ **0.11** tons of zinc per hour and identified as Unit 11, exhausting at one (1) stack identified as S/V15; and a steel wire petroleum based charcoal wipe.
- (2) #2 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 3 exhausting at one (1) stack identified as S/V3; one (1) hot dip galvanizing kettle utilizing ~~0.1~~ **0.14** tons of zinc per hour and identified as Unit 8, exhausting at one (1) stack identified as S/V11; and a steel wire petroleum based charcoal wipe.

- (3) #3 Hot Dip Galvanizing Line rated at 2.26 tons of steel wire per hour, including one (1) hydrochloric acid cleaning (pickling) tank identified as Unit 4 exhausting at one (1) stack identified as S/V4; one (1) hot dip galvanizing kettle utilizing ~~0.4~~ **0.14** tons of zinc per hour and identified as Unit 9, exhausting at one (1) stack identified as S/V12; and a steel wire petroleum based charcoal wipe.
- (d) Two (2) natural gas fired boilers identified as Boiler 1, constructed in 1955 with a maximum heat input rate of 26 million British thermal units (MMBtu) per hour, and Boiler ~~2~~ **3**, constructed in 1975 with a maximum heat input rate of 33.5 MMBtu per hour. Each boiler has the capability of firing No. 2 distillate oil as an alternative fuel, and each boiler exhausts to one (1) stack respectively identified as S/V1 and S/V2.

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #1 Hot Dip Galvanizing Line shall not exceed ~~6.4~~ **6.4** pounds per hour when operating at a process weight rate of 1.8 tons of steel wire per hour.
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #2 Hot Dip Galvanizing Line shall not exceed ~~7.4~~ **7.4** pounds per hour when operating at a process weight rate of 2.3 tons of steel wire per hour.
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as #3 Hot Dip Galvanizing Line shall not exceed ~~7.4~~ **7.4** pounds per hour when operating at a process weight rate of 2.3 tons of steel wire per hour.
- (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the facility identified as the #3 Oil Tempering Line shall not exceed 6.0 pounds per hour when operating at a process weight rate of 1.75 tons of steel wire per hour.
- (e) The pounds per hour limitations were calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

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

Comment #3:

Condition A.3: IS&W requests that the following statement be added to the condition:

The applicant identified various insignificant activities at the source and although those activities have no applicable federal requirements, they are authorized to be operated under this permit.

This provision would ensure that the insignificant activities referenced in the Title V permit application were reviewed and included in this permit.

Response #3:

The Part 70 permit application for this source included a completed Form GSD-10(a) for insignificant activities. A listing of the source's insignificant activities is contained in the original TSD to the permit. This listing serves as verification that the identified emission units and processes have been reviewed for inclusion in the permit. While no new activities have been identified as insignificant, several processes that do have applicable federal requirements were overlooked for inclusion in Condition A.3. Condition A.3, page 5 of 37, is revised to include these facilities and, in relation to the change to A.3, new Condition C.2 is added to the Part 70 permit as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source ~~does not currently have any~~ **also includes the following** insignificant activities **which are specifically regulated**, as defined in 326 IAC 2-7-1 (21) ~~that have applicable federal requirements~~:

- (a) **The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.**
- (b) **Asbestos abatement projects regulated by 326 IAC 14-10.**
- (c) **Pebble lime storage silo with a 30 ton storage capacity, with particulate matter controlled by a baghouse, exhausting at one (1) stack.**
- (d) **One (1) electric arc furnace (EAF) with a maximum melt capacity of 100 pounds of metal per hour.**

C.2 **Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Conditions C.2 through C.21 of the draft Part 70 permit have been renumbered accordingly. Additionally, during an OAM inspection of the plant at the beginning of 1998 a copper plating line was observed at the source. This line was listed on Form GSD-10(a) of the permit application as an insignificant activity; however, the source has since specified it has permanently discontinued using this line and it will sell the equipment if possible. The source is currently using hardware on the copper plating line to supply parts to other facilities at the source.

Comment #4:

Condition B.11 Annual Compliance Certification: To define when the first certification is due and what period is covered by this certification, IS&W requests that the following provision be added to the condition:

- (d) The Permittee's first certification shall be due July 1, 1999, and shall cover the period from the permit effective date through December 31, 1998.

Response #4:

Sections B and C of the Part 70 permit are designed to apply in a standard fashion to most sources subject to Part 70 permitting. OAM is not currently planning to include a source specific initial reporting requirement in Condition B.11. However, the applicant has correctly identified their first-time reporting period for compliance certification as the effective date of their Part 70 permit through the end of the calendar year (i.e., 1998, provided the permit is issued during this calendar year). This issue aside, OAM has decided to make the following changes to Condition B.11, page 7 of 37:

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
 - (5) Any insignificant activity that has been added without a permit revision; and**
 - ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment #5:

Condition B.12 Preventive Maintenance Plan: IS&W requests that this condition be deleted from the permit since the source does not have any control devices nor does it require a PMP.

Response #5:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- (a) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- (b) Implement the preventive maintenance plan; and,
- (c) Forward to the department upon request the preventive maintenance plan.

Rules 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. While the requirements of Condition B.12 may not currently apply to this source specifically, the potential for source modifications and equipment changes necessitates the condition. Therefore, the condition will not be deleted. This issue aside, OAM has decided to make the following changes to Condition B.12, page 8 of 37:

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

Comment #6:

Condition C.1(b): For the equipment covered under the Part 70 permit, this condition requires the source to obtain a PSD permit before any change or modification can occur that would cause a potential emissions increase to 250 tons per year. IS&W requests that this provision be removed. The condition incorrectly implies that the source is a synthetic minor, with potential emissions limited to less than the major source threshold of 250 tons per year. The source is a natural minor with potential emissions below 250 tons per year. IS&W also requests the condition be deleted since the permit should not supplant what the rule (i.e., 326 IAC 2-2, PSD) requires.

Response #6:

Condition C.1(b) is deleted from the permit. The source is a natural minor with respect to PSD applicability (i.e., potential emissions are less than the 250 ton per year PSD threshold, and it is not one of the 28 regulated source categories) and, pursuant to 326 IAC 2-2, Condition C.1(b) does not apply. Additionally, OAM has decided to make the following changes to Condition C.1, page 18 of 37:

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

~~(a)~~ The total source potential ~~emissions to emit~~ of volatile organic compounds (VOC), particulate matter (PM), PM with an aerodynamic diameter less than or equal to 10 microns (PM-10), oxides of nitrogen (NO_x), and sulfur dioxide (SO₂) are each less than 250 tons per ~~365 consecutive day period~~ **year**. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

~~(b)~~ Any change or modification which may increase potential emissions to 250 tons per ~~twelve (12) consecutive month period~~, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

Comment #7:

Condition C.6 Operation of Equipment: IS&W requests that this condition, which refers to the operation of air pollution control equipment, be deleted since IS&W does not operate any air pollution control equipment.

Response #7:

As noted in Response #4, it has been OAM's intention to standardize Sections B and C as much as possible. While Condition C.6 (now C.7) may not currently apply to this source specifically, the potential for source modifications and equipment changes necessitates the condition. Therefore, the condition will not be deleted. However, OAM has decided to make the following changes to Condition C.6 (now C.7), page 18 of 37:

C.67 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission unit vented to the control equipment is in operation. ~~as described in Section D of this permit.~~

Comment #8:

Condition C.9 Compliance Schedule: IS&W requests that Conditions C.9(a) and (b) be clarified to be more clear and consistent with applicable regulations because they suggest that IS&W will continue to comply with requirements that do not exist.

Response #8:

OAM has decided to make general changes to Condition C.9 (now C.10), page 19 of 37, which clarifies the condition as follows:

C.910 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements;** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

Comment #9:

Condition C.15 Compliance Monitoring Plan: IS&W requests that this condition be deleted. Condition C.15 requires IS&W to perform certain monitoring and develop a compliance response plan for each compliance monitoring condition in the permit. None of IS&W's facilities are big enough to warrant a compliance monitoring plan. None exceed the threshold set out in the IDEM guidance (i.e., May 1996 and subsequent related compliance monitoring guidance). As indicated in IS&W's application, no compliance monitoring plan should be required for any of IS&W's units.

Response #9:

In the May 14, 1996 Compliance Monitoring Guidance, IDEM specified the criteria used to determine when submission (by the applicant) of a compliance monitoring plan (CMP) are required. According to the guidance, a CMP is required:

1. Whenever a unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
2. The unit is subject to a NSPS or NESHAP; or
3. The unit has a device to control emissions and the allowable emissions exceed 10 pounds per hour; or
4. The unit does not have a control device and it has actual emissions exceeding 25 tons per year.

As correctly cited by IS&W, none of the facilities found in Section D of the permit meet the above criteria. However, the CMP requirement of Condition C.15, page 22 of 37, is comprised not only of the compliance monitoring and determination requirements contained in Section D, but it also includes the preventive maintenance plan (if applicable), the compliance response plan (if applicable), and the Record Keeping and Reporting Requirements of Sections C and D. Even if facility specific requirements of Section D do not apply, general record keeping and reporting (Section C) requirements do apply to every Part 70 source. With the exception of citation additions to the condition heading, no changes are made to Condition 15.

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5~~(3)~~]
[326 IAC 2-7-6] [326 IAC 1-6]

Comment #10:

Condition C.16 Actions Related to Noncompliance Demonstrated by a Stack Test: IS&W requests that this condition be deleted. Condition C.16 sets forth a variety of requirements that IS&W must follow when a stack test exceeds the applicable limits. These actions are not set out in the regulations, and therefore IS&W requests that Condition C.16 be deleted.

Response #10:

The specific regulatory requirement for Actions Related to Noncompliance Demonstrated by a Stack Test is the citation used for the entire Corrective Actions and Response Steps section. The rules cited are 326 IAC 2-7-5 and 326 IAC 2-7-6. The provision is also consistent with the Compliance Monitoring Plan provisions and the reporting of deviations. Condition C.16, page 23 of 37, will remain in the permit and it is changed to read as follows:

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-7-5]**
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment #12:

Condition C.18 Monitoring Data Availability: This condition sets out times in which sampling and performance tests should be conducted. IS&W believes that no compliance monitoring conditions should apply to its operations and therefore requests that Condition C.18 be deleted.

Response #12:

Condition C.18, page 24 of 37, as stated pertains to all observations, sampling, maintenance procedures, and record keeping requirements of the permit. The source is correct that performance testing and sampling are not currently applicable; nonetheless, a request by OAM for performance testing or sampling could be made if it is necessary for the source to demonstrate compliance with an applicable requirement. Additionally, conditions of this permit do require record keeping. Therefore, Condition C.18 will remain in the permit.

Comment #13:

Condition C.19(a) General Record Keeping Requirements: This condition requires the source to produce records less than three (3) years in age within one (1) hour of a verbal request from OAM. IS&W requests that it be allowed more than one hour to respond to a verbal request from IDEM for three year old data. IS&W believes the condition should require the information to be available within a reasonable period of time.

Response #13:

OAM has decided to make the following changes to Condition C.19(a), page 25 of 37:

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]~~[326 IAC 2-7-5]~~[326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request~~ of an IDEM, OAM representative, for a minimum of three (3) years. ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the within a reasonable time.**

Comment #14:

Condition C.19(c)(4): This provision states that IS&W must maintain certain records of preventive maintenance. IS&W does not operate any control devices and therefore requests that Condition C.19(c)(4) be deleted.

Response #14:

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- (a) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- (b) Implement the preventive maintenance plan; and,
- (c) Forward to the department upon request the preventive maintenance plan.

Rules 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits). IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only for:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and

- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or
- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

In most cases, the requirement to maintain a preventive maintenance plan and perform compliance monitoring has followed the same guidelines as specified above. While the requirements of Condition C.19(c)(4), page 25 of 37, may not currently apply to this source specifically, the potential for source modifications and equipment changes necessitates the condition. Therefore, the condition will not be deleted.

Comment #15:

Condition C.20(a) General Reporting Requirements: IS&W requests that the compliance reporting required by this condition be changed from a quarterly submission to a semi-annual submission since the applicable regulation requires semi-annual reporting.

Condition C.20(e): IS&W requests that the clause stating that failure to take response steps is a deviation be deleted. IS&W believes that no compliance monitoring should be required and therefore requests that this clause be deleted.

Response #15:

Because there are no facility specific Section D quarterly reporting requirements, general reporting pursuant to Condition C.20(a), page 25 of 37, will be revised to semi-annually. Further, OAM has decided to make the following changes to Condition C.20, page 25 of 37, including a clarification to condition (e):

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a ~~Quarterly~~ **Semi-annual Compliance Monitoring Report**. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.

- (d) Unless otherwise specified in this permit, any ~~quarterly~~ **semi-annual** report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 16:

Condition D.1.2 Volatile Organic Compounds: IS&W requests that this condition be deleted since the permitting rule establishes when approval is required. If a change occurs requiring such approval, then IS&W will obtain the approval pursuant to 326 IAC 2-1. It is noted that the potential emissions for all three lines equal approximately 21.3 tons per year, or an approximate 8 tons per year for the hot dip galvanizing line. 326 IAC 8-1-6 would not apply to the #3 tempering line because it was built in 1978, prior to the January 1, 1980 applicability date of 326 IAC 8-1-6.

Response 16:

Source applicability to state VOC emission limits promulgated at 326 IAC 8 are discussed on page 11 of 12 of the original TSD. The discussion on potential 326 IAC 8-1-6 rule applicability (New Facilities: General VOC Reduction Requirements) incorrectly cites the #3 Oil Tempering Line, which was installed at the source in 1978, as having a post-1980 construction date. Additionally, a discussion on potential source applicability to the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) was inadvertently omitted. Therefore, Condition D.1.2, page 29 of 37, is deleted and the original TSD discussion on Article 8 rule applicability is revised as follows:

326 IAC 8-1-6 (New Facilities; General VOC Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have a PTE VOC at 25 tons per year or more, and which are not otherwise regulated by another provision of Article 8. Only the #1 Hot Dip Galvanizing and #3 Oil Tempering Lines were installed after the January 1, 1980 applicability date. However, neither these lines, nor any other facility at this source has this facility does not have a PTE VOC at 25 tons per year or more. Therefore, 326 IAC 8-1-6 is not applicable to this source.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-1 (Applicability) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), facilities constructed after January 1, 1980 that are located in any county except Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, and that have a potential to emit VOC at 25 tons per year or greater, shall limit the VOC content of the applied coating to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings. The source is located in Delaware County, and only the #1 Hot Dip Galvanizing Line was installed after January 1, 1980. However, the facility's PTE VOC is below 25 tons per year. Therefore, 326 IAC 8-2-9 is not applicable to the source.

~~D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]~~

~~Any change or modification which may increase potential VOC usage at the #1 Hot Dip Galvanizing Line or the #3 Oil Tempering Line to twenty-five (25) tons per year or greater, shall require OAM's prior approval before such change can take place.~~

Comment #17:

Condition D.1.4 Visible Emissions Notations: IS&W requests that this condition be deleted because the potential emissions for these operations are below the thresholds for which compliance monitoring is required and therefore no compliance monitoring should be required for these operations.

Response #17:

IDEM's compliance monitoring guidance states that a compliance monitoring plan is required only if:

- (a) the unit emits particulate matter, sulfur dioxide, or volatile organic compounds; and
- (b) the unit has existing applicable requirements; and
- (c) the unit is subject to a NSPS or NESHAP (for these units current requirements will satisfy as a compliance monitoring plan); or

- (d) the unit has a control device and the allowable emissions exceed 10 pounds per hour; or
- (e) the unit does not have a control device and has actual emissions exceeding 25 tons per year.

The guidance does not state that, if a facility does not meet the above requirements, compliance monitoring will never be necessary. It does state that a compliance monitoring plan is not required to be submitted with the application. While the above criteria may not necessarily be met by any of the affected process lines, the visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6-3-2. As a result, Condition D.1.4 (now D.1.3), page 29 of 37, will not be deleted. However, Condition D.1.4 (now D.1.3) is changed to state that visible emission notations are required only when emissions are vented to the outside atmosphere.

D.1.34 Visible Emissions Notations

- (a) Daily visible emission notations of each process line's exhaust stack(s) shall be performed during normal daylight operations when each facility is in operation **and 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) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Comment #18:

Condition D.1.5(a) and (b) Record Keeping Requirements: IS&W requests that these conditions, which are designed to document compliance with Conditions D.1.2 and D.1.4, be deleted because IS&W has requested that Conditions D.1.2 and D.1.4 be deleted.

Response #18:

As discussed in Response #16 and #17 above, Condition D.1.2 is deleted while Condition D.1.4 (now D.1.3) remains in the permit. As such, Condition D.1.5 (now D.1.4), page 29 of 37, is changed as follows:

D.1.54 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.1.2, the Permittee shall maintain records of monthly VOC usage on each process line.~~
- (b)(a)** To document compliance with Condition D.1.4**3**, the Permittee shall maintain records of daily visible emission notations of each process line's exhaust stack(s).

- (e)(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment #19:

Condition D.2.5 Visible Emission Notations: IS&W requests that these compliance monitoring requirements be deleted because the potential emissions from the natural gas fired boilers are below the thresholds for which compliance monitoring should be required.

Condition D.2.6(b) Record Keeping Requirements to Demonstrate Compliance with Condition D.2.5: IS&W requests that this condition be deleted because IS&W as part of these comments has requested that Condition D.2.5 be deleted.

Response #19:

While the guidance criteria for compliance monitoring plans cited in Response #17 are not met for either boiler, the facilities must indicate compliance with applicable limits of 326 IAC 5-1 and 326 IAC 6-2. To indicate compliance with these limits, Condition D.2.5 will remain in the permit; however, the condition is changed to require visible emission notations only when either boiler burns No. 2 distillate oil for fuel and it is exhausting to the atmosphere. To indicate rule compliance when the boilers are burning natural gas fuel, existing Condition D.2.7 requires submission of a natural gas boiler certification report to OAM. This condition will also remain in the permit, but the submission frequency is changed to semi-annually. Conditions D.2.5(a), page 31 of 37, and D.2.7, page 32 of 37, are changed as follows:

D.2.5 Visible Emissions Notations

- (a) Daily visible emission notations of each boiler's exhaust stack shall be performed during normal daylight operations when the facilities are in operation, **and burning No. 2 distillate fuel oil and exhausting to the atmosphere**. A trained employee shall record whether emissions are normal or abnormal.

D.2.7 Reporting Requirements

Using the form provided the Permittee shall either:

- (a) Certify that natural gas was fired in Boiler 1 and Boiler 2 at all times during the reporting period; or
- (b) Report the number of days during the reporting period that an alternate fuel, as No.2 distillate oil, was burned.
- (c) This form shall be submitted with the ~~Quarterly~~ **Semi-annual** Compliance Report required by Section C - General Reporting Requirements of this permit.

Comment #20:

Part 70 Operating Permit Quarterly Compliance Report: IS&W believes that the report form should be modified to require reporting semi-annually and to require the source to only list deviations instead of listing all requirements whether or not a deviation occurred.

Response #20:

The Part 70 Operating Permit Compliance Report, page 37 of 37, is now called the Part 70 Operating Permit Compliance Monitoring Report. The form is changed as shown at the end of this Addendum.

Besides the comments received and addressed above, the OAM has decided to make additional changes to the Part 70 Operating Permit. The page number citations for the Part 70 permit refer to the proposed or draft version of the permit. Due to the number of changes made, the revised Part 70 Operating Permit will have different page numbers. The revised Part 70 Operating Permit Table of Contents, pages 2 through 3, should be consulted for the new page numbers to the revised conditions described below.

- 1) In Section A, Source Summary, on page 4 of 37 of the Part 70 Operating Permit, the following language has been included:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~
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.

- 2) Condition A.5 (Prior Permit Conditions Superseded) on page 5 of 37 has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions.

~~A.5 Prior Permit Conditions Superseded [326 IAC 2]~~

~~The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source, and supersede all terms and conditions in all registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

- 3) Condition B.1, (Permit No Defense) part (b), on page 6 of 37, has been changed as follows:

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**

- 4) Condition B.8, (Duty to Supplement and Provide Information), part (c), on page 7 of 37, has been changed as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee must shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

- 5) Condition B.14 (Permit Shield), on page 10 of 37 has been changed to read as follows:

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**

- ~~(a)~~**(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~

- (1) The applicable requirements are included and specifically identified in this permit; **or**
- (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~

- ~~(b) (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~

~~(e)~~ (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. **No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

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

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

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

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

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

6) Condition B.16 (Deviations from Permit Requirements and Conditions) on page 11 of 37, has been changed as follows:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) An emergency as defined in 326 IAC 2-7-1(12); or
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(e)~~ (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

7) Condition B.18, (Permit Renewal), part (a) on page 12 of 37, has been changed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

8) Condition B.19 (Administrative Permit Amendment) on page 13 of 37, Condition B.20 (Minor Permit Modification) on page 13 of 37, and B.21 (Significant Permit Modification) on page 14 of 37, have all been combined into one condition numbered B.19 (Permit Amendment and Modification) shown below. The new B.19 condition will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

- 9) Condition B.26 (now B.24) (Inspection and Entry), on page 16 of 37, has been changed as follows:

~~B.26~~24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

- (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

- 10) Condition B.27 (now B.25) (Transfer of Ownership or Operation) part (b) on page 16 of 37, has been changed as follows:

B.2725 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- 11) Condition B.28 (now B.26) (Annual Fee Payment), page 16 of 37, has been changed as follows:

B.2826 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM, 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) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

- 12) New Condition B.28 (Credible Evidence) has been added to the end of Section B. It reads as follows:

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

- 13) Condition C.7 (now C.8) (Asbestos Abatement Projects - Accreditation), page 19 of 37, **and** C.12 (Asbestos Abatement Projects), page 20 of 37, have been combined into one condition which will read as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) **Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.**
- (b) **The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:**

- (1) **When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**
- (2) **If there is a change in the following:**
 - (A) **Asbestos removal or demolition start date;**
 - (B) **Removal or demolition contractor; or**
 - (C) **Waste disposal site.**
- (c) **The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).**
- (d) **The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).**

All required notifications shall be submitted to:

**Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
- 14) Condition C.8 (now C.9) (Performance Testing), page 19 of 37, the rule cite has been changed to 326 IAC 3-6, and the following changes have been made:

C.89 Performance Testing ~~326 IAC 3-2-1~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 15) Condition C.10 (now C.11) (Compliance Monitoring), page 20 of 37 is changed to read as follows:

~~C.4011~~ **C.411 Compliance Monitoring** [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date, and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34)

- 16) Condition C.11, (now C.12) (Monitoring Methods), page 20 of 37 has been changed as follows:

~~C.4412~~ **C.412 Monitoring Methods** [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

- 17) Condition C.12 (Asbestos Abatement Projects), page 20 of 37, has been deleted. It is now Condition C.8 (Asbestos Abatement Projects):

~~G.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

- ~~(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~~
- ~~(3) Waste disposal site.~~
- ~~(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).~~
- ~~(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).~~
- ~~All required notifications shall be submitted to:~~
- ~~Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~
- ~~(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited Asbestos Inspector~~

~~The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.~~

18) Condition C.13 (Emergency Reduction Plans), page 21 of 37, has been changed as follows:

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. ~~If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such plan.~~

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

19) Condition C.14 (Risk Management Plan), page 22 of 37, has been changed to read as follows:

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

20) Condition C.17(Emission Statement) part (a), page 24 of 37, has been changed as follows:

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit an ~~certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

21) D.1.3 (now D.1.2)(Testing Requirements), page 29 of 37, has been changed as follows.

~~D.1.3~~ **D.1.3** Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

22) D.2.3 (Testing Requirements), page 30 of 37, has been changed as follows.

~~D.2.3~~ **D.2.3** Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test these facilities is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facilities are in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

23) On the Part 70 Operating Permit Certification Form, page 33 of 37, the checkbox and wording for “Emergency/Deviation Occurrence Reporting Form” have been deleted. The form is changed as shown at the end of this Addendum.

24) On the second page of the Emergency/Deviation Occurrence Reporting Form, page 35 of 37, the wording “attach a signed certification to complete this report” on the bottom of the page has been deleted. The form is changed as shown at the end of this Addendum.

Besides the comments received and addressed above, the OAM has decided to make the following change to the original TSD. Potential facility emissions for the #3 Oil Tempering Line and the #1 Hot Dip Galvanizing Line, as shown in tabular format on page 5 of 12 of the original TSD, are corrected. Additionally, the permitting rule applicability language that follows the #1 Hot Dip Galvanizing Line emissions table, as shown on page 6 of 12 of the original TSD, is corrected for consistency with the table. The original TSD is revised as follows:

(1) #3 Oil Tempering Line:

Indiana Permit Allowable Emissions Definition for #3 Oil Tempering Line installed in 1978 (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable	Emissions	Potential	Emissions
	(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
PM	143.3*	26.1*	46.0	8.4
PM-10	---	---	46.0	8.4
SO ₂	---	---	46.0 0	8.4 0
VOC	---	---	0	0
CO	---	---	0	0
NOx	---	---	0	0
Single HAP	---	---	0	0
Combination of HAPs	---	---	0	0

* Extrapolated from the pound per hour allowable limit determined at 326 IAC 6-3-2.

(2) #1 Hot Dip Galvanizing Line:

Indiana Permit Allowable Emissions Definition for #1 Hot Dip Galvanizing Line installed in 1989 (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable	Emissions	Potential	Emissions
	(lb/day)	(ton/yr)	(lb/day)	(ton/yr)
PM	145.4 154.6*	26.5 28.2*	53.5 59.6	9.8 10.9
PM-10	---	---	59.6	10.9
SO ₂	---	---	0	0
VOC	---	---	0 77.0	0 14.1
CO	---	---	0	0
NOx	---	---	0	0
Single HAP	---	---	162.7	29.7
Combination of HAPs	---	---	162.7	29.7

* Extrapolated from the pound per hour allowable limit determined at 326 IAC 6-3-2.

- (a) Allowable emissions of **particulate matter (PM)** are determined from the applicability of rule 326 IAC 6-3. See attached spreadsheets for detailed calculations (eight (8) pages).

- (b) The potential emissions **of PM and volatile organic compounds (VOC)** before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM **and VOC** are **both** less than 25 tons per year, but greater than 25 pounds per day **and 15 pounds per day, respectively**. Therefore, pursuant to 326 IAC 2-1, a registration is required.
- (d) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. However, the installation of this line pre-dates the permit requirement for HAPs and, therefore, a construction permit pursuant to 326 IAC 2-1 is not required.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

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:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 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:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

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

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

**PART 70 OPERATING PERMIT
~~QUARTERLY~~ SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Indiana Steel and Wire
Source Address: 2200 East Jackson Street, Muncie, Indiana 47307
Mailing Address: P.O. Box 2647, Muncie, Indiana 47307
Part 70 Permit No.: T035-6570-00048

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted ~~quarterly~~ **semi-annually**. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ **in the box marked "No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation	— No — — Deviations —

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Appendix A: Emissions Summary

Company Name: Indiana Steel & Wire
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47307
Part 70 No.: T035-6570
Plant ID: 035-00048
Reviewer: Michael Hirtler
Date: February 23, 1998

Potential Uncontrolled Emissions (tons per year)

Process/facility	Potential Uncontrolled Emissions (tons/year)							
	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Total HAPs
# 3 Oil Tempering Line	8.4	8.4	0.0	0.0	0.0	0.0	0.0	0.0
#1 Hot Dip Galvanizing Line	10.9	10.9	0.0	14.1	0.0	0.0	29.7	29.7
#2 Hot Dip Galvanizing Line	3.1	3.1	0.0	23.4	0.0	0.0	48.8	48.8
#3 Hot Dip Galvanizing Line	3.1	3.1	0.0	23.4	0.0	0.0	48.8	48.8
Electrogalvanizing Line	0.0	0.0	0.0	0.0	0.0	0.0	79.5	79.5
Boiler 1*	1.6	1.6	56.9	0.3	4.0	16.2	0.0	0.0
Boiler 3*	2.1	2.0	72.3	0.4	5.1	20.5	0.0	0.0
Natural Gas Fired Process Furnaces**	2.8	2.8	0.1	1.4	5.0	23.6	0.04	0.04
Electric Arc Furnace**	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0
Pebble Lime Storage Silo**	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions (tons/year)	34.0	33.9	129.3	63.0	14.1	60.3	206.8	206.8

* Worst case emissions of natural gas or #2 fuel oil firing shown for each pollutant.

** Insignificant activity.

Potential Controlled/Limited Emissions (tons per year)

Process/facility	Potential Controlled/Limited Emissions (tons/year)							
	PM	PM10	SO2	VOC	CO	NOx	Single HAP	Total HAPs
# 3 Oil Tempering Line	8.4	8.4	0.0	0.0	0.0	0.0	0.0	0.0
#1 Hot Dip Galvanizing Line	10.9	10.9	0.0	14.1	0.0	0.0	29.7	29.7
#2 Hot Dip Galvanizing Line	3.1	3.1	0.0	23.4	0.0	0.0	48.8	48.8
#3 Hot Dip Galvanizing Line	3.1	3.1	0.0	23.4	0.0	0.0	48.8	48.8
Electrogalvanizing Line	0.0	0.0	0.0	0.0	0.0	0.0	79.5	79.5
Boiler 1*	1.6	1.6	56.9	0.3	4.0	16.2	0.0	0.0
Boiler 3*	2.1	2.0	72.3	0.4	5.1	20.5	0.0	0.0
Natural Gas Fired Process Furnaces**	2.8	2.8	0.1	1.4	5.0	23.6	0.04	0.04
Electric Arc Furnace**	2.0	2.0	0.0	0.0	0.0	0.0	0.0	0.0
Pebble Lime Storage Silo**	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Emissions (tons/year)	34.0	33.9	129.3	63.0	14.1	60.3	206.8	206.8

* Worst case emissions of natural gas or #2 fuel oil firing shown for each pollutant.

** Insignificant activity.

**Appendix A: Process Emission Calculations
(Page 1 of 4)**

**Company Name: Indiana Steel & Wire
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47307
Part 70 No.: T035-6570
Plant ID: 035-00048
Reviewer: Michael Hirtler
Date: February 23, 1998**

*****Potential Uncontrolled Emissions*****

Electric Arc Furnace:

The following calculations determine emissions from the electric arc furnace rated at 100 pounds of steel per hour, based on 8,760 hours of production and emission factors based on engineering judgement and USEPA AP-42, 5th Edition, Table 12.13-2 (SCC #3-04-007-01).

PM:	0.05 tons steel/hr x	9.2 lb PM/ton steel x	8760 hr/yr /	2000 lb / ton =	2.01	tons/yr
PM10:	0.05 tons steel/hr x	9.2 lb PM/ton steel x	8760 hr/yr /	2000 lb / ton =	2.01	tons/yr
NOx:	0.05 tons steel/hr x	0.2 lb PM/ton steel x	8760 hr/yr /	2000 lb / ton =	0.04	tons/yr

Pebble Lime Storage Silo:

The following calculations determine emissions from the lime storage silo based on the maximum throughput of 250 tons lime per year, and emission factors taken from USEPA AP-42, 5th Edition, Chapter 13.2.4 for aggregate handling.

The following calculations determine the amount of emissions created by truck unloading of lime, based on 8,760 hours of use and USEPA'S AP-42, 5th Edition, Ch 11.2.3 as follows:

$$E_f = k \cdot (0.0032) \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

=	0.0054 lb PM/ton lime	=	0.0026 lb PM10/ton lime
where k =	0.74 (PM particle size multiplier)	where k =	0.35 (PM10 particle size multiplier)
U =	10 mile/hr mean wind speed	U =	10 mile/hr mean wind speed
M =	2.1 % material moisture content	M =	2.1 % material moisture content

PM:	250 tons lime/yr x	0.0054 lb PM/ton lime /	2000 lb / ton =	0.0007	tons/yr
PM10:	250 tons lime/yr x	0.0026 lb PM10/ton lime /	2000 lb / ton =	0.0003	tons/yr

#3 Oil Tempering Line - Unit7:

The following calculations determine quench oil process emissions from the #3 oil tempering line, rated at 1.75 tons of wire per hour, as determined from stack testing:

PM/PM10: 1.91 lb PM/hr (tested) x 4.38 ton/yr / lb/hr = 8.37 tons/yr

#1 Hot Dip Galvanizing Line - Units 6, 10 & 11:

The following calculations determine hydrochloric acid (HCl) cleaning (unit 6), and molten zinc kettle (unit 11) and molten galfan (approx. 91% zinc, 9% aluminum) kettle (unit10) process emissions from the #1 hot dip galvanizing line. The facility (i.e., line) is rated at 1.79 tons of wire per hour. Emissions for unit 6 are determined from stack testing; unit 10 emissions are based on engineering mass balance computations; unit 11 emissions are based on USEPA's AP-42, 5th Edition, Table 12.14-2 (SCC 3-04-008-05) for PM and engineering mass balance computations for VOC.

unit 6 (acid cleaning):	HCl	6.78 lb HCl/hr (tested) x	4.38 ton/yr / lb/hr =	29.70 tons/yr		
unit 10 (molten galfan kettle):	PM/PM10	0.06 ton galfan/hr x	32.2 lb PM/ton galfan x	4.38 ton/yr / lb/hr =	8.46	tons/yr
unit 11 (molten zinc kettle):	PM/PM10	0.11 ton zinc/hr x	5 lb PM/ton zinc x	4.38 ton/yr / lb/hr =	2.41	tons/yr
unit 11 (molten zinc kettle):	VOC	3.21 lb VOC/hr x	4.38 ton/yr / lb/hr =	14.06 tons/yr		

#2 Hot Dip Galvanizing Line - Units 3 & 8

The following calculations determine hydrochloric acid (HCl) cleaning (unit 3) and molten zinc kettle (unit 8) process emissions from the #2 hot dip galvanizing line. The line is rated at 2.26 tons of wire per hour. Emissions for unit 3 are determined from stack testing and unit 8 emissions are based on USEPA's AP-42, 5th Edition, Table 12.14-2 (SCC 3-04-008-05) for PM and engineering mass balance computations for VOC.

unit 3 (acid cleaning):	HCl	11.14 lb HCl/hr (tested) x	4.38 ton/yr / lb/hr =	48.79 tons/yr		
unit 8 (molten zinc kettle):	PM/PM10	0.14 ton zinc/hr x	5 lb PM/ton zinc x	4.38 ton/yr / lb/hr =	3.07	tons/yr
unit 8 (molten zinc kettle):	VOC	5.35 lb VOC/hr x	4.38 ton/yr / lb/hr =	23.43 tons/yr		

#3 Hot Dip Galvanizing Line - Units 4 & 9

The following calculations determine hydrochloric acid (HCl) cleaning (unit 4) and molten zinc kettle (unit 9) process emissions from the #3 hot dip galvanizing line. The line is rated at 2.26 tons of wire per hour. Emissions for unit 4 are determined from stack testing and unit 9 emissions are based on USEPA's AP-42, 5th Edition, Table 12.14-2 (SCC 3-04-008-05) for PM and engineering mass balance computations for VOC.

unit 4 (acid cleaning):	HCl	11.14 lb HCl/hr (tested) x	4.38 ton/yr / lb/hr =	48.79 tons/yr		
unit 9 (molten zinc kettle):	PM/PM10	0.14 ton zinc/hr x	5 lb PM/ton zinc x	4.38 ton/yr / lb/hr =	3.07	tons/yr
unit 9 (molten zinc kettle):	VOC	5.35 lb VOC/hr x	4.38 ton/yr / lb/hr =	23.43 tons/yr		

Electrogalvanizing Line - Unit 5

The following calculations determine hydrochloric acid (HCl) cleaning (unit 5) process emissions from the electrogalvanizing line which is rated at 2.26 tons of wire per hour. Emissions for unit 5 are determined from stack testing.

HCl: 18.16 lb HCl/hr (tested) x 4.38 ton/yr / lb/hr = 79.54 tons/yr

Fifteen (15) Lead Heat Treating Furnaces - Units 43-46, 62, 63, 65, 66, 68-70, 72-75

The following calculations determine the PM/PM10 and lead (Pb) emissions from the 15 molten lead baths used at the source for heat treating of steel wire. The heat input capacities of these furnaces, and their combustion related emissions are presented on page 8 of 8, of TSD Appendix A, Natural Gas Combustion-Process Units. PM/PM10 and lead emissions are based on USEPA's FIRE database (version 5.1b) and a total maximum lead usage rate for all 15 furnaces of 85 pounds per hour.

PM/PM10/Pb: 0.2 lb PM/ton Pb charged x 0.0425 ton Pb/hr x 4.38 ton/yr / lb/hr = 0.04 tons/yr

*****Potential Controlled Emissions and 326 IAC 6-3-2 Compliance Determination*****

The allowable PM emission rate pursuant to 326 IAC 6-3-2(c), Process Operations, for weight rates up to 60,000 lb/hr is determined using the following formula:

$E = 4.1 * P^{0.67}$ where: E = allowable PM emission rate (lb/hr)
P = process weight rate (tons/hr)

Electric Arc Furnace:

This facility is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$E = 4.1 * (100/2000)^{0.67}$
E = 0.55 lb PM/hr (allowable)
Potential uncontrolled PM: 2.01 tons/yr / 4.38 ton/yr / lb/hr = 0.46 lb PM/hr (will comply)

Pebble Lime Storage Silo:

This facility is controlled by a bag type dust collector; therefore, the potential controlled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$E = 4.1 * (250/8760)^{0.67}$
E = 0.39 lb PM/hr (allowable)
Potential controlled PM: 0.0007 tons/yr * (1 - 0.999) = 6.81E-07 tons/yr / 4.38 = 1.55E-07 lb PM/hr (will comply)

#3 Oil Tempering Process Line - Unit7 (Quench Oil Process Tank):

This facility is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$E = 4.1 * (1.75)^{0.67}$
E = 5.97 lb PM/hr (allowable)
Potential uncontrolled PM: 8.37 tons/yr / 4.38 ton/yr / lb/hr = 1.91 lb PM/hr (will comply)

#1 Hot Dip Galvanizing Line - Units 10 & 11:

This process line (i.e., facility) is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$$E = 4.1 * (1.79+0.11+0.06)^{0.67}$$

$$E = 6.44 \text{ lb PM/hr (allowable)}$$

Unit 10 potential uncontrolled PM:	8.46 tons/yr /	4.38 ton/yr / lb/hr =	1.93 lb PM/hr
Unit 11 potential uncontrolled PM:	2.41 tons/yr /	4.38 ton/yr / lb/hr =	0.55 lb PM/hr
		facility total =	2.48 lb PM/hr (will comply)

#2 Hot Dip Galvanizing Line - Unit 8

This process line (i.e., facility) is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$$E = 4.1 * (2.26+0.14)^{0.67}$$

$$E = 7.37 \text{ lb PM/hr (allowable)}$$

Unit 8 potential uncontrolled PM:	3.07 tons/yr /	4.38 ton/yr / lb/hr =	0.70 lb PM/hr (will comply)
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#3 Hot Dip Galvanizing Line - Unit 9

This process line (i.e., facility) is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$$E = 4.1 * (2.26+0.14)^{0.67}$$

$$E = 7.37 \text{ lb PM/hr (allowable)}$$

Unit 9 potential uncontrolled PM:	3.07 tons/yr /	4.38 ton/yr / lb/hr =	0.70 lb PM/hr (will comply)
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Fifteen (15) Lead Heat Treating Furnaces - Units 43-46, 62, 63, 65, 66, 68-70, 72-75

The lead heat treating process (as the total of all furnaces) is uncontrolled; therefore, the potential uncontrolled PM emissions are used to determine 326 IAC 6-3-2(c) compliance:

$$E = 4.1 * (85/2000)^{0.67}$$

$$E = 0.38 \text{ lb PM/hr (allowable)}$$

Potential uncontrolled PM:	0.04 tons/yr /	4.38 ton/yr / lb/hr =	0.01 lb PM/hr (will comply)
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(Note: combustion related emissions for the furnaces are shown on page 8 of 8, TSD Appendix A)

Appendix A: Emissions Calculations
Industrial Boilers 10 < MM BTU/HR <100
#2 Fuel Oil

Company Name: Indiana Steel & Wire
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47307
Part 70 No.: T035-6570
Plant ID: 035-00048
Reviewer: Michael Hirtler
Date: February 23, 1998

Combustion Unit	Capacity MMBtu/hr	Potential Thruput kgal/yr	Emission Factor in lb/kgal					Potential Emission Rate in tons/year						
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Boiler 1	26.0	1615.32	2.0	1.0	142S	20.0	0.2	5.0	1.62	0.81	56.94	16.15	0.16	4.04
Boiler 2	33.0	2050.21	2.0	1.0	142S	20.0	0.2	5.0	2.05	1.03	72.27	20.50	0.21	5.13
Total Potential Emission (tons/yr)									3.67	1.83	129.21	36.66	0.37	9.16

Methodology

1 gallon of No. 2 Fuel Oil has an assumed average heating value of 141,000 Btu
 Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal / 1000 gallon x 1 gal / 0.141 MM Btu
 Emission Factors are from AP 42, 5th Edition, Tables 1.3-2 and 1.3-5 (SCC 1-02-005-01/02/03)
 Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal) / 2,000 lb/ton

Compliance with 326 IAC 6-2-4

Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county, existing and operating prior to September 21, 1983, shall be limited by the formula established at 326 IAC 6-2-3 as follows:

$$Pt = (C * a * h) / (76.5 * Q^{0.75} * N^{0.25}) \quad \text{where:}$$

- Pt = allowable emission limit (lb PM /MMBtu)
- C = max. groundlevel concentration for critical wind speed (50 ug/m³)
- a = plume rise factor (0.67 for Q <= 1,000 MMBtu/hr)
- h = stack height (ft--both stacks are 66 feet)
- Q = total source maximum heat input (MMBtu/hr)
- N = number of stacks in fuel burning operation

For Boiler 1 (installed 1955):
 Pt = (50 * 0.67 * 66) / (76.5 * 26^{0.75} * 1^{0.25})
 Pt = 2.51 lb/MMBtu. By 326 IAC 6-2-3(d) default, however, the allowable cannot exceed **0.8 lb/MMBtu (allowable)**
 20.80 lb PM / hour (equivalent allowable emissions)
 91.10 ton PM / year (equivalent allowable emissions) **will comply**

For Boiler 2 (installed 1975):
 Pt = (50 * 0.67 * 66) / (76.5 * (26+33.5)^{0.75} * 2^{0.25})
 Pt = 1.13 lb/MMBtu. By 326 IAC 6-2-3(d) default, however, the allowable cannot exceed **0.8 lb/MMBtu (allowable)**
 26.40 lb PM / hour (equivalent allowable emissions)
 115.63 ton PM / year (equivalent allowable emissions) **will comply**

Compliance with 326 IAC 7-1.1-2

The following calculations determine the maximum sulfur content of #2 distillate fuel allowed by 326 IAC 7-1.1-2:

$$0.5 \text{ lb/MMBtu} \times 141,000 \text{ Btu/gal} = 70.5 \text{ lb/1000 gal}$$

$$70.5 \text{ lb/1000 gal} / 142 \text{ lb/1000 gal} = 0.5 \% \text{ Sulfur (S) Allowed}$$

Sulfur content must be less than or equal to 0.5 % to comply with 326 IAC 7-1.1-2.
 Facility will comply with 326 IAC 7-1.1-2 by using fuel oil with a limited 0.5% sulfur content.

Appendix A: Emissions Calculations
Industrial Boilers 10 < MM BTU/HR <100
Natural Gas

Company Name: Indiana Steel & Wire
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47307
Part 70 No.: T035-6570
Plant ID: 035-00048
Reviewer: Michael Hirtler
Date: February 23, 1998

Combustion Unit	Capacity MMBtu/hr	Potential Thruput MMcf/yr	Emission Factor in lb/MMcf						Potential Emission Rate in tons/year					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Boiler 1	26.0	227.76	14.0	14.0	0.6	140.0	2.78	35.0	1.59	1.59	0.07	15.94	0.32	3.99
Boiler 2	33.0	289.08	14.0	14.0	0.6	140.0	2.78	35.0	2.02	2.02	0.09	20.24	0.40	5.06
Total Potential Emission (tons/yr)									3.62	3.62	0.16	36.18	0.72	9.04

Methodology

MMBtu = 1,000,000 Btu

MMcf = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMcf/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMcf/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02

Emission (tons/yr) = Throughput (MMcf/yr) x Emission Factor (lb/MMcf)/2,000 lb/ton

Compliance with 326 IAC 6-2-4

Pursuant to 326 IAC 6-2-1, indirect heating facilities not in a specified county, existing and operating prior to September 21, 1983, shall be limited by the formula established at 326 IAC 6-2-3 as follows:

$$Pt = (C * a * h) / (76.5 * Q^{0.75} * N^{0.25}) \quad \text{where:}$$

Pt = allowable emission limit (lb PM /MMBtu)
C = max. groundlevel concentration for critical wind speed (50 ug/m³)
a = plume rise factor (0.67 for Q <= 1,000 MMBtu/hr)
h = stack height (ft--both stacks are 66 feet)
Q = total source maximum heat input (MMBtu/hr)
N = number of stacks in fuel burning operation

For Boiler 1 (installed 1955):

$$Pt = (50 * 0.67 * 66) / (76.5 * 26^{0.75} * 1^{0.25})$$

Pt = 2.51 lb/MMBtu. By 326 IAC 6-2-3(d) default, however, the allowable cannot exceed **0.8 lb/MMBtu (allowable)**
20.80 lb PM / hour (equivalent allowable emissions)
91.10 ton PM / year (equivalent allowable emissions) **will comply**

For Boiler 2 (installed 1975):

$$Pt = (50 * 0.67 * 66) / (76.5 * (26+33.5)^{0.75} * 2^{0.25})$$

Pt = 1.13 lb/MMBtu. By 326 IAC 6-2-3(d) default, however, the allowable cannot exceed **0.8 lb/MMBtu (allowable)**
26.40 lb PM / hour (equivalent allowable emissions)
115.63 ton PM / year (equivalent allowable emissions) **will comply**

**Appendix A: Emission Calculations
Natural Gas Combustion-Process Units**

Company Name: Indiana Steel & Wire
Address City IN Zip: 2200 East Jackson Street, Muncie, IN 47307
Part 70 No.: T035-6570
Plant ID: 035-00048
Reviewer: Michael Hirtler
Date: February 23, 1998

Combustion Unit	Capacity MMBtu/hr	Potential Thruput MMCF/yr	Emission Factor in lb/MMCF						Potential Emission Rate in tons/year					
			PM	PM10	SO2	NOx	VOC	CO	PM	PM10	SO2	NOx	VOC	CO
Existing Heat Treating Furnaces														
Unit 42--#1 PCC tube furnace	1.30	11.39	11.9	11.9	0.6	100.0	5.8	21.0	0.07	0.07	0.00	0.57	0.03	0.12
Unit 43--#1 PCC Pb furnace	0.86	7.53	11.9	11.9	0.6	100.0	5.8	21.0	0.04	0.04	0.00	0.38	0.02	0.08
Unit 44--#3 OT preheat Pb furnace	4.04	35.39	11.9	11.9	0.6	100.0	5.8	21.0	0.21	0.21	0.01	1.77	0.10	0.37
Unit 45--#3 OT hot Pb furnace	7.53	65.96	11.9	11.9	0.6	100.0	5.8	21.0	0.39	0.39	0.02	3.30	0.19	0.69
Unit 46--#3 OT draw Pb furnace	3.97	34.78	11.9	11.9	0.6	100.0	5.8	21.0	0.21	0.21	0.01	1.74	0.10	0.37
Unit 62--#1 Galvanizing Pb furnace	3.17	27.77	11.9	11.9	0.6	100.0	5.8	21.0	0.17	0.17	0.01	1.39	0.08	0.29
Unit 63--#1 Galvanizing Pb furnace	3.02	26.46	11.9	11.9	0.6	100.0	5.8	21.0	0.16	0.16	0.01	1.32	0.08	0.28
Unit 64--#1 Galvanizing Galfan furnace	3.17	27.77	11.9	11.9	0.6	100.0	5.8	21.0	0.16	0.16	0.01	1.32	0.08	0.28
Unit 65--#2 Galvanizing N Pb furnace	1.44	12.61	11.9	11.9	0.6	100.0	5.8	21.0	0.08	0.08	0.00	0.63	0.04	0.13
Unit 66--#2 Galvanizing S Pb furnace	2.09	18.31	11.9	11.9	0.6	100.0	5.8	21.0	0.11	0.11	0.01	0.92	0.05	0.19
Unit 67--#2 Galvanizing Zn furnace	3.52	30.84	11.9	11.9	0.6	100.0	5.8	21.0	0.18	0.18	0.01	1.54	0.09	0.32
Unit 68--#3 Galvanizing N Pb furnace	2.09	18.31	11.9	11.9	0.6	100.0	5.8	21.0	0.11	0.11	0.01	0.92	0.05	0.19
Unit 69--#3 Galvanizing SE Pb furnace	1.44	12.61	11.9	11.9	0.6	100.0	5.8	21.0	0.08	0.08	0.00	0.63	0.04	0.13
Unit 70--#3 Galvanizing SW Pb furnace	3.17	27.77	11.9	11.9	0.6	100.0	5.8	21.0	0.17	0.17	0.01	1.39	0.08	0.29
Unit 71--#3 Galvanizing Zn furnace	3.52	30.84	11.9	11.9	0.6	100.0	5.8	21.0	0.18	0.18	0.01	1.54	0.09	0.32
Unit 72--#6 Galvanizing NE Pb furnace	3.17	27.77	11.9	11.9	0.6	100.0	5.8	21.0	0.17	0.17	0.01	1.39	0.08	0.29
Unit 73--#6 Galvanizing NW Pb furnace	1.44	12.61	11.9	11.9	0.6	100.0	5.8	21.0	0.08	0.08	0.00	0.63	0.04	0.13
Unit 74--#6 Galvanizing SE Pb furnace	1.94	16.99	11.9	11.9	0.6	100.0	5.8	21.0	0.10	0.10	0.01	0.85	0.05	0.18
Unit 75--#6 Galvanizing SW Pb furnace	3.17	27.77	11.9	11.9	0.6	100.0	5.8	21.0	0.17	0.17	0.01	1.39	0.08	0.29
Potential Emission in tons/yr	54.05								2.81	2.81	0.14	23.61	1.37	4.96

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x Number x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Potential Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Emission factors from AP 42, Supplement B of 5th Edition, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, for commercial (≥ 0.3 & < 10.0 MMBtu/hr) combustion units.