

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**R.G. Applegate Steel Company, Inc.
201 Owens Street
Saratoga, Indiana 47382**

(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 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.: T135-7071-00019	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air 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 manufacturing operation which produces miscellaneous metal parts which are used in livestock equipment.

Responsible Official: Kevin Kerns, Vice President
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Phone Number: 765-584-4631
SIC Code: 3523
County Location: Randolph
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:

- (1) Five (5) surface coating dip tanks (ID Nos. 005, 006, 007, 008, and 009), each coating a maximum of 45 metal parts per hour (constructed in 1978); and
- (2) Four (4) surface coating flow coaters (ID Nos. 001, 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 001, 002, 003, and 004, respectively) (constructed in 1978).

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):

- (1) One (1) new single chamber incinerator, burning a maximum of 100 pounds per hour of waste including paint filters, paper, broken wooden skids, non-toxic, non-heavy metal, non-HAP paint covered gravel and other non-toxic, non-heavy metal, non-HAP paint covered miscellaneous items, with natural gas fired primary chamber and secondary afterburners, each rated at 1.2 and 0.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack (ID No. S/V 005).
- (2) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

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 [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 2-7-15, 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, except those specifically designated as not federally enforceable, 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)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, 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, 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); and
 - (5) 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).

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]

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- (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 failure to implement the Preventive Maintenance Plan 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. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

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)(10) 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 prevent 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)(7)]

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.
- (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 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 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 2-1.1 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) 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:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;
 - (ii) The date on which the change will occur;
 - (iii) Any change in emissions; and
 - (iv) 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.22 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.23 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, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, 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)]

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

B.25 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 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.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 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. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 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 applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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.8 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 any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, 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 IDEM, OAM, 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.9 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; 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.

C.10 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. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air 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.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 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.12 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 prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on November 1, 1996.
- (b) 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.
- (c) 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.
- (d) 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.
- (e) 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a 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.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) 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.16 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.17 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. 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 Commissioner 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 failure to implement the Preventive Maintenance Plan 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.18 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 Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.

Stratospheric Ozone Protection

C.19 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)]

- (1) Five (5) surface coating dip tanks (ID Nos. 005, 006, 007, 008, and 009), each coating a maximum of 45 metal parts per hour (constructed in 1978); and
- (2) Four (4) surface coating flow coaters (ID Nos. 001, 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 001, 002, 003, and 004, respectively) (constructed in 1978).

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

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

D.1.1 Volatile Organic Compounds [326 IAC 8-6-2] [326 IAC 2-2] [40 CFR 52.21]

The five (5) dip tanks and the four (4) flow coaters shall use no more than 99.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-6-2 (Organic Solvent Emission Limitations) not applicable. This usage limit also limits the source wide potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period, therefore, compliance with this limit also makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

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

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limit and/or the VOC emission limit established in Condition D.1.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

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

- (1) One (1) new single chamber incinerator, burning a maximum of 100 pounds per hour of waste including paint filters, paper, broken wooden skids, non-toxic, non-heavy metal, non-HAP paint covered gravel and other non-toxic, non-heavy metal, non-HAP paint covered miscellaneous items, with natural gas fired primary chamber and secondary afterburners, each rated at 1.2 and 0.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack (ID No. S/V 005).

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

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

D.2.1 Particulate Matter (PM) [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2 (Incinerators), all incinerators shall:

- (a) consist of primary and secondary chambers or the equivalent;
- (b) be equipped with a primary burner unless burning wood products;
- (c) comply with 326 IAC 5-1 and 326 IAC 2;
- (d) be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (i) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

Compliance Determination Requirement

D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019

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: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 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
<input checked="" type="radio"/> 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 Quarterly Report

Source Name: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019
Facility: Five (5) dip tanks (ID Nos. 005 through 009) and four (4) flow coaters (ID Nos. 001 through 004)
Parameter: Volatile organic compounds (VOC)
Limit: The five (5) dip tanks and the four (4) flow coaters shall use no more than 99.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

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

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019

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. 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

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: R.G. Applegate Steel Company, Inc.
 Source Location: 201 Owens Street, Saratoga, Indiana 47382
 County: Randolph
 SIC Code: 3523
 Operation Permit No.: T135-7071-00019
 Permit Reviewer: Trish Earls/EVP

On April 25, 1998, the Office of Air Management (OAM) had a notice published in The News Gazette, Winchester, Indiana, stating that R.G. Applegate Steel Company, Inc. had applied for a Part 70 Operating Permit to operate a miscellaneous metal part manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed 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 permit should be issued as proposed.

On June 15, 1998, R.G. Applegate Steel Company, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment #1

Applegate Steel Company produces livestock equipment, thus entailing our company to have Non-Toxic, Non-Heavy Metal, Non-Hazardous paint (livestock will actually eat our dried paint at times off of the equipment). However, in an attempt to always have everything "spotless", Applegate Steel would like to request that the Title V allow for burning dried paint off of gravel or any other miscellaneous units in our incinerator.

Response #1

Since the paint or coatings used to coat the metal parts at this source contain little or no HAPs, and the source confirms that the paint is " Non-Toxic, Non-Heavy Metal, Non-Hazardous paint", the equipment description for the incinerator, which is an insignificant activity, will be revised to include paint covered gravel and other miscellaneous items among the type of waste being burned in the incinerator. This will not change the potential emissions from the incinerator since all VOC emissions from the coatings were accounted for in the emission calculations for the five (5) dip tanks and the four (4) flow coaters. Item (1) of the Insignificant Activities section of the TSD now reads as follows (changes in bold or strikeout):

- (1) One (1) new single chamber incinerator, burning a maximum of 100 pounds per hour of waste including paint filters, paper, ~~and~~ broken wooden skids, **non-toxic, non-heavy metal, non-HAP paint covered gravel and other non-toxic, non-heavy metal, non-HAP paint covered miscellaneous items**, with natural gas fired primary chamber and secondary afterburners, each rated at 1.2 and 0.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack (ID No. S/V 005).

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The words Enhanced New Source Review and the rule cite for ENSR have been removed from the title page of the Part 70 Operating permit. This rule has been repealed.

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.

2. Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

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.**

3. Condition A.1 (General Information) has been revised to include the phone number of the source. This will help the Compliance Data Section when they need to contact the source regarding their reporting requirements.

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

The Permittee owns and operates a stationary manufacturing operation which produces miscellaneous metal parts which are used in livestock equipment.

Responsible Official: Kevin Kerns, Vice President
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Phone Number: 765-584-4631
SIC Code: 3523
County Location: Randolph
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

4. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.

5. Condition B.1 (Permit No Defense) 326 IAC 2-1 has been repealed. Also, part (b) of Condition B.1 has been revised to reference the permit shield condition that is found later in Section B.

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."**
6. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
- (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.
7. In condition B.9 (Compliance with Permit Conditions), the following language has been added to show that conditions that are not federally enforceable may not constitute a violation of the Clean Air Act.

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, **except those specifically designated as not federally enforceable**, 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.

8. Condition B.10 (Certification) has been revised since there are currently no certifications that would not be required to be certified by the Responsible Official. has been revised as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) **Where specifically designated by this permit or required by an applicable requirement, any** 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).

9. Condition B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

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

10. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a). Paragraphs (b) and (c) have also been revised.

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~~ **failure to implement the Preventive Maintenance Plan** 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. **IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

11. In condition B.13 (Emergency Provisions), the rule cite in paragraph (e) has been revised to reflect the new Article 2 rule.

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

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(c)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

12. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source and to clarify the intent of the condition. Also, the rule cite in paragraph (h) has been revised to reflect the new Article 2 rule.

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 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 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. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- (d) (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)~~ **2-7-12(b)(7)**]

13. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

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 such failure 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.

14. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :

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)**.

15. Condition B.18(b)(1)(B) (Permit Renewal) 326 IAC 2-5 has been repealed.

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

- (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]~~

16. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) 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)]**

17. Condition B.23 (Changes Under Section 502(b)(10) of the Clean Air Act) has been deleted and condition B.24(b) (Operational Flexibility), now re-numbered as B.21, has been revised as follows. Both conditions refer to the same rule and it makes more sense for them to be combined.

~~**B.23 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.241 Operational Flexibility [326 IAC 2-7-20]

- ~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~
- (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:**
- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).**
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**
 - ~~(1)~~**(i)** A brief description of the change within the source;
 - ~~(2)~~**(ii)** The date on which the change will occur;
 - ~~(3)~~**(iii)** Any change in emissions; and
 - ~~(4)~~**(iv)** 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).

18. In the revised condition B.24, now re-numbered as B.21, (Operational Flexibility) the rule cite 326 IAC 2-1 has been replaced with 326 IAC 2-1.1 in B.21(a)(2).

B.21 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 ~~2-4~~ **2-1.1** has been obtained;
19. In condition B.25 (re-numbered B.22) (Construction Permit Requirement), the referenced statute has been repealed, therefore this condition has been revised.

B.22 Construction Permit Requirement [326 IAC 2]

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

20. Condition B.26 (now renumbered B.23) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have, and to clarify confidentiality.

B.23 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, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such,** the Permittee shall allow IDEM, 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)]
21. 326 IAC 2-1 has been repealed. Therefore, condition B.27 (b)(now re-numbered B.24) (Transfer of Ownership or Operation) has been modified and is also revised to clarify that this notification does not require a certification by a responsible official.

~~B.27 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.~~
- ~~(c) IDEM, OAM, shall reserve the right to issue a new permit.~~

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

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

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

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

22. Condition B.28 (now renumbered B.25) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.

B.25 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~~ **Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action or revocation of this permit.**
- (c) **~~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.~~**

23. Condition B.29 (Enhanced New Source Review) ENSR has been repealed.

~~B.29 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.~~

24. Condition C.1 (PSD Minor Source Status) has been removed from the permit. IDEM, OAM has determined that this condition should no longer be included in this section.

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

- ~~(a) The total source potential to emit VOC is limited to 249.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

25. A new condition C.1 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) has been added that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.1 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.

26. Condition C.2 (Opacity) has been revised as follows to reflect the current rule language.

C.2 Opacity [326 IAC 5-1]

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

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor** in a six (6) hour period.

27. Condition C.4 (Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

C.4 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. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

28. Condition C.6 (Operation of Equipment) has been revised to clarify the requirement. It has also been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

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

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

29. Conditions C.7 (Asbestos Abatement Projects-Accreditation) and C.12 (Asbestos Abatement

Projects) have been combined into one new condition C.7 (Asbestos Abatement Projects).

C.7 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 applicable 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 applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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.

30. Condition C.8 (Performance Testing) is revised to correct a rule citation, to specify the locations of applicable procedures and analysis methods for performance testing, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.8 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~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, 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~~ **IDEM, OAM**, 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).

31. Condition C.9 (Compliance Schedule) has been revised to more closely match the rule language.

C.9 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; and** ~~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.~~

32. Condition C.10 (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring and to clarify when compliance monitoring must begin.

C.10 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. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** 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~~ **that equipment cannot be installed and operated within ninety (90) days,** the Permittee **may extend the compliance schedule related to the equipment for 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).

33. Condition C.11 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing **required by Section D** ~~performed to meet the 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.

34. Condition C.14 (now re-numbered as C.13) (Risk Management Plan) has been revised to more closely match the rule language of 40 CFR 68 and clarify that any submittal under this condition requires a certification by a responsible official.

C.143 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present **at a source** in more than ~~the a~~ 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).

35. Condition C.15 (now re-numbered C.14) (Actions Related to Noncompliance Demonstrated by a Stack Test) is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

**C.154 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).

36. Condition C.16 (a) (now re-numbered C.15) (Emission Statement) has been revised to clarify the

certification requirement for the emission statement.

C.165 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:

37. Condition C.18(a) (now re-numbered C.17) (General Record Keeping Requirements) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language. Also, part (c)(4) has been modified to match B.12 as follows:

C.187 General Record Keeping Requirements ~~[326 IAC 2-7-5(3)(B)]~~~~[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 Commissioner within a reasonable time.**

(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~~ **failure to implement the Preventive Maintenance Plan** 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.

38. Condition C.19 (now re-numbered as C.18) (General Reporting Requirements) is revised to

clarify what is included in the compliance monitoring reports and to clarify exactly which documents require certification by the responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.198 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 Compliance **Monitoring Report**. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

(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 report shall be submitted within thirty (30) days of the end of the reporting period. **The reports do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

(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:~~ **The Emergency/Deviation Occurrence Report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

~~(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.
39. The facility description box in Section D.1 is revised to include the rule citation and to clarify that descriptive information is not federally enforceable. If something about the description should be enforceable then it needs to be contained in a specific D condition.

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

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

- 40. The Certification Form is revised to clarify which forms require a certification.
- 41. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.
- 42. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

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

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019

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:

**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: R.G. Applegate Steel Company, Inc.
Source Address: 201 Owens Street, Saratoga, Indiana 47382
Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
Part 70 Permit No.: T135-7071-00019

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: _____

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 COMPLIANCE MONITORING REPORT**

Source Name: R.G. Applegate Steel Company, Inc.
 Source Address: 201 Owens Street, Saratoga, Indiana 47382
 Mailing Address: P.O. Box 68, Saratoga, Indiana 47382-0068
 Part 70 Permit No.: T135-7071-00019

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. 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 REQUIREMENT EXISTING FOR THIS SOURCE:

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

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

Attach a signed certification to complete this report.

43. The first sentence in Section A.1 of the Part 70 Operating Permit has been revised to specify what the miscellaneous metal parts are used for 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 miscellaneous metal parts manufacturing operation.~~ **The Permittee owns and operates a stationary manufacturing operation which produces miscellaneous metal parts which are used in livestock equipment.**

44. Condition A.3 of the Part 70 Operating Permit has been revised to include those insignificant activities for which there are applicable rules. An additional section D.2 has been added to the permit for the single chamber incinerator because 326 IAC 4-2 (Incinerators) applies to this insignificant activity. The only applicable rule for the brazing equipment, etc. is 326 IAC 6-3-2(c) and the process weight rate is less than 100 pounds per hour, therefore, no additional section D has been added for this equipment since it is covered under condition C.2. The revised condition A.3 now reads as follows (changes in bold or strikeout):

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 insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.~~

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

- (1) **One (1) new single chamber incinerator, burning a maximum of 100 pounds per hour of waste including paint filters, paper, broken wooden skids, non-toxic, non-heavy metal, non-HAP paint covered gravel and other non-toxic, non-heavy metal, non-HAP paint covered miscellaneous items, with natural gas fired primary chamber and secondary afterburners, each rated at 1.2 and 0.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack (ID No. S/V 005).**
- (2) **The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.**

The State Rule Applicability section of the TSD now includes the applicability of 326 IAC 4-2-2 to the incinerator. However, the particulate matter limitation pursuant to 326 IAC 4-2-2(8)(A) does not apply because the incinerator has a maximum refuse-burning capacity of less than 200 pounds per hour. The applicability of 326 IAC 4-2-2 is explained as follows:

326 IAC 4-2-2 (Incinerators)

The single chamber incinerator, burning a maximum of 100 pounds per hour of waste, is subject to 326 IAC 4-2-2 because it is an incinerator which emits regulated pollutants. Pursuant to this rule, all incinerators shall:

- (a) consist of primary and secondary chambers or the equivalent;
- (b) be equipped with a primary burner unless burning wood products;
- (c) comply with 326 IAC 5-1 and 326 IAC 2;
- (d) be maintained properly as specified by the manufacturer and approved by the commissioner;
- (e) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (f) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;

- (g) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (h) not emit particulate matter in excess of five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (i) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

45. In the initial permit review, it was determined that the five (5) dip tanks and four (4) flow coaters at the source are subject to the requirements of 326 IAC 8-6-2, Organic Solvent Emission Limitations, because potential VOC emissions from these units are greater than 100 tons per year. However, the rule was incorrectly interpreted as only applying to VOC emissions from organic solvent usage and not to VOC emissions from the paint or coating usage. The rule also applies to VOC emissions from coating usage because the solvents that make up the coating are carrying agents. Therefore, to avoid the requirements of the rule, the source must limit total VOC emissions from the five (5) dip tanks and four (4) flow coaters to 99.0 tons per year. The source has stated that based on their actual VOC emissions from these units over the past two (2) years, they can accept a VOC emission limitation of 99.0 tons per year to avoid the requirements of this rule. Therefore, conditions D.1.1 and D.1.2 have been combined into one condition, numbered D.1.1, which limits total VOC usage, including coatings, dilution solvents, and cleaning solvents, to 99.0 tons per year. Also, the two quarterly report forms for the dip tanks and flow coaters have been combined into one form since there is now only one VOC limit. The revised condition D.1.1 now reads as follows (additions in bold, deletions in strikeout):

~~D.1.1 PSD Minor Limit~~ **Volatile Organic Compounds [326 IAC 8-6-2]** [326 IAC 2-2] [40 CFR 52.21]

The five (5) dip tanks and the four (4) flow coaters shall use no more than ~~248.3~~ **99.0** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. **Compliance with this limit makes 326 IAC 8-6-2 (Organic Solvent Emission Limitations) not applicable.** This usage limit ~~is required to limit~~ **also limits** the source wide potential to emit of VOC to ~~249~~ **less than 250** tons per twelve (12) consecutive month period, **therefore,** ~~compliance with this limit~~ **also** makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

~~D.1.2 Volatile Organic Compounds [326 IAC 8-6-2]~~

~~The five (5) dip tanks and the four (4) flow coaters shall use no more than 99.0 tons of VOC from dilution solvents and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-6-2 (Organic Solvent Emission Limitations) not applicable.~~

All subsequent conditions in section D.1 have been re-numbered accordingly.

The Limited Potential to Emit table of the TSD is revised as follows to include the revised limited potential VOC emissions from the dip tanks and flow coaters:

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 (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating	0.0	0.0	0.0	248.3 99.0	0.0	0.0	69.6
Total Emissions	0.0	0.0	0.0	249.0 99.71	0.0	0.0	69.6

* Total Emissions include emissions from Insignificant Activities.

46. Condition D.1.4, now re-numbered as D.1.3, of the Part 70 Operating Permit has been revised to incorporate new model permit changes made by the OAM and to reflect the removal of condition D.1.2. The revised condition reads as follows (changes in bold or strikethrough):

D.1.43 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of this facility is not specifically required by this permit.~~ **The Permittee is not required to test this facility by this permit.** However, **IDEM may require compliance testing when necessary to determine if the facility is in compliance.** If testing is required by **IDEM**, compliance with the VOC limits specified in Conditions D.1.1 ~~and D.1.2~~ 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.~~

47. Condition D.1.5, now re-numbered as D.1.4, of the Part 70 Operating permit has been revised to reflect the removal of condition D.1.2. Also, an additional Compliance Determination condition has been added to section D.1 relating to the VOC emission limitation in condition D.1.1. Condition D.1.4 and the new condition numbered D.1.5 now read as follows:

D.1.54 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 ~~and D.1.2~~ shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

With the removal of condition D.1.2 and the addition of this condition, all subsequent conditions in section D.1 have been restored to their original numbering.

48. On October 13, 1993, this source requested in a letter that the dip tank (ID No. 009), which is listed as unpermitted in the TSD for this Part 70 Operating Permit, be added to the operation permit. The letter stated that the dip tank was in existence at the time of the original application. Due to an oversight, the OAM did not respond to this letter. Therefore, since the source did notify the OAM of the existence of this dip tank and attempted to have it included in the existing operation permit, the dip tank will be considered as a permitted emission unit and will not be listed as an unpermitted emission unit. The Permitted and Unpermitted Emission Units and Pollution Control Equipment sections of the TSD now read as follows:

Permitted Emission Units and Pollution Control Equipment

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

- (1) ~~Four (4)~~ **Five (5)** surface coating dip tanks (ID Nos. 005, 006, 007, 008, and **009**), each coating a maximum of 45 metal parts per hour (constructed in 1978); and
- (2) One (1) surface coating flow coater (ID No. 001), coating a maximum of 125 metal parts per hour, exhausting through one (1) stack (S/V 001) (constructed in 1978).

Unpermitted Emission Units and Pollution Control Equipment

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

- ~~(1) One (1) surface coating dip tank (ID No. 009), coating a maximum of 45 metal parts per hour (constructed in 1978); and~~
- (1) Three (3) surface coating flow coat**ers (ID Nos. 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 002, 003, and 004, respectively) (constructed in 1978).

Due to this change and document template changes made by the OAM, paragraph (a) of the Enforcement Issue section of the TSD now reads as follows:

- ~~(a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:~~

- ~~(1) One (1) surface coating dip tank (ID No. 009), coating a maximum of 45 metal parts per hour; and~~
- ~~(1) Three (3) surface coating flow coat~~ers (ID Nos. 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 002, 003, and 004, respectively):

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.**

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: R.G. Applegate Steel Company, Inc.
Source Location: 201 Owens Street, Saratoga, Indiana 47382
County: Randolph
SIC Code: 3523
Operation Permit No.: T135-7071-00019
Permit Reviewer: Trish Earls/EVP

The Office of Air Management (OAM) has reviewed a Part 70 permit application from R.G. Applegate Steel Company, Inc. relating to the operation of a miscellaneous metal parts manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

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

- (1) Four (4) surface coating dip tanks (ID Nos. 005, 006, 007, and 008), each coating a maximum of 45 metal parts per hour (constructed in 1978); and
- (2) One (1) surface coating flow coater (ID No. 001), coating a maximum of 125 metal parts per hour, exhausting through one (1) stack (S/V 001) (constructed in 1978).

Unpermitted Emission Units and Pollution Control Equipment

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

- (1) One (1) surface coating dip tank (ID No. 009), coating a maximum of 45 metal parts per hour (constructed in 1978); and
- (2) Three (3) surface coating flow coaters (ID Nos. 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 002, 003, and 004, respectively) (constructed in 1978).

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

All unpermitted facilities are to be reviewed under the ENSR process.

Insignificant Activities

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

- (1) One (1) new single chamber incinerator, burning a maximum of 100 pounds per hour of waste including paint filters, paper, and broken wooden skids, with natural gas fired primary chamber and secondary afterburners, each rated at 1.2 and 0.8 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack (ID No. S/V 005).

- (2) One (1) mineral spirits storage tank (ID No. APP1), with a maximum storage capacity of 2,000 gallons.
- (3) One (1) toluene/xylene storage tank (ID No. APP2), with a maximum storage capacity of 1,000 gallons.
- (4) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (5) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.
- (6) Paved and unpaved roads and parking lots with public access.

Existing Approvals

The source has been operating under the following approvals:

- (1) Operation Permit No. 135-00019, issued February 26, 1992.

Enforcement Issue

- (a) IDEM is aware that the following equipment has been constructed and operated prior to receipt of the proper permit:
 - (1) One (1) surface coating dip tank (ID No. 009), coating a maximum of 45 metal parts per hour; and
 - (2) Three (3) surface coating flow coaters (ID Nos. 002, 003, and 004), each coating a maximum of 125 metal parts per hour, each exhausting through one (1) stack (S/V 002, 003, and 004, respectively).
- (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 November 1, 1996. Additional information was received on March 26, 1998.

A notice of completeness letter was mailed to R.G. Applegate Steel Company, Inc. on November 25, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (two (2) pages).

Total Potential and Allowable Emissions from Emission Units Under ENSR

Indiana Permit Allowable Emissions Definition, for emission units being reviewed under ENSR, (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	--	0.0
Particulate Matter (PM10)	--	0.0
Sulfur Dioxide (SO ₂)	--	0.0
Volatile Organic Compounds (VOC)	--	1594.91
Carbon Monoxide (CO)	--	0.0
Nitrogen Oxides (NO _x)	--	0.0
Single Hazardous Air Pollutant (HAP)	--	24.78
Combination of HAPs	--	45.93

- (a) The potential emissions before control are used for the permitting determination.
- (b) Allowable emissions (as defined in the Indiana Rule) of VOC are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (c) 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. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

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	less than 100
VOC	greater than 250
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)
Xylene	greater than 10
Toluene	greater than 10
Benzene	less than 10
Ethylbenzene	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of VOC 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 1995 actual emission data provided by the applicant.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO ₂	0.0
VOC	169.4
CO	0.0
HAP (Xylene)	22.8
HAP (Toluene)	33.3
HAP (Ethylbenzene)	5.5
NO _x	0.0

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 (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Surface Coating	0.0	0.0	0.0	248.3	0.0	0.0	69.6
Total Emissions	0.0	0.0	0.0	249.0	0.0	0.0	69.6

* Total Emissions include emissions from Insignificant Activities.

County Attainment Status

The source is located in Randolph 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. Randolph 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:

- (1) 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.
- (2) 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) There are no New Source Performance Standards (326 IAC 12), 40 CFR Part 60, applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not subject to 326 IAC 2-2 (PSD). This rule applies to sources with potential emissions of any criteria pollutant greater than or equal to 250 tons per year. This source will limit coating and solvent usage in the five (5) dip tanks and the four (4) flow coaters such that associated VOC emissions do not exceed 248.3 tons per year for a source wide VOC emission limit of 249 tons per year, therefore, the requirements of 326 IAC 2-2 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 VOC. 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)

This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), fugitive dust shall not be visible crossing the boundary or property line of a source. 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 2-1-3.4 (New Source Toxics Control)

The five (5) dip tanks (ID Nos. 005 through 009) and the four (4) flow coaters (ID Nos. 001 through 004) are not subject to 326 IAC 2-1-3.4. This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of a combination of HAPs greater than or equal to twenty-five (25) tons per year. The rule does not apply to facilities that have been constructed before the effective date of this rule (July 27, 1997). Since the five (5) dip tanks and four (4) flow coaters are not new or reconstructed facilities, and have been constructed and/or permitted prior to July 27, 1997, the requirements of 326 IAC 2-1-3.4 do not apply.

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

The five (5) dip tanks (ID Nos. 005 through 009) and the four (4) flow coaters (ID Nos. 001 through 004) are not subject to 326 IAC 8-2-9 because these facilities were constructed prior to November 1, 1980 and the source is located in Randolph County.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The five (5) dip tanks (ID Nos. 005 through 009) and the four (4) flow coaters (ID Nos. 001 through 004), constructed in 1978, are not subject to the requirements of 326 IAC 8-6. Pursuant to 326 IAC 8-6-1, this rule applies to existing sources as of January 1, 1980, located in Lake and Marion Counties, and sources commencing operation after October 7, 1974, and prior to January 1, 1980, located anywhere in the state with potential VOC emissions greater than 100 tons per year, not limited by other rules in Article 8. This applies only to emissions of organic solvents which are liquids at standard conditions, and include diluents which are used as solvers, viscosity reducers, carrying agents, and cleaning agents. For this surface coating operation, the organic solvents used are xylene, toluene, and mineral spirits. The source will limit organic solvent usage in the five (5) dip tanks and four (4) flow coaters such that associated VOC emissions do not exceed 99.0 tons per year. Therefore, the requirements of 326 IAC 8-6-2 will not apply.

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:

The five (5) dip tanks and four (4) flow coaters have applicable compliance monitoring conditions as specified below:

- (a) Total emissions of VOC shall not exceed 248.3 tons per 12 consecutive month period, rolled on a monthly basis;
- (b) Total emissions of VOC from organic solvent usage, not including coatings, shall not exceed 99.0 tons per 12 consecutive month period, rolled on a monthly basis;
- (c) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include total monthly VOC emissions for the five (5) dip tanks and four (4) flow coaters and total monthly VOC emissions from organic solvent usage for the five (5) dip tanks and four (4) flow coaters.

These monitoring requirements are necessary to ensure that the requirements of 326 IAC 2-2 (PSD) and 326 IAC 8-6 (Organic Solvent Emission Limitations) do not apply and to ensure compliance with 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) The facilities reviewed under ENSR will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The

concentrations of these air toxics were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxics Analysis

Pollutant	Rate (lb/hr)	Rate @ 8,760 hr/yr (ton/yr)	Modeled Concentration (Fg/m ³)	OSHA PEL (Fg/m ³)	% OSHA PEL
Xylene	6.07	26.59	29,490	435,000	5.13
Toluene	8.57	37.54	29,490	752,000	4.23
Ethylbenzene	1.24	5.43	29,490	435,000	1.06
Benzene	2.3E-03	1.0E-02	29,490	3,200	0.27

Methodology:

Rate ton/yr = (rate lb/hr)*(hr/yr of operation)*(ton/2000 lbs)

Note: Since the stack gas exit velocity from each of the four flow coater exhaust stacks was unknown, a conservative exit velocity of 0.01 meters per second was assumed for the stack gas exit velocity in the modeling analysis.

(c) See attached calculations for detailed air toxic calculations. (Page 2 of 2, Appendix A)

Conclusion

The operation of this miscellaneous metal parts manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T135-7071-00019**.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: R.G. Applegate Steel Company, Inc.
Address City IN Zip: 201 Owens Street, Saratoga, Indiana 47382
Operation Permit No.: T135-7071
Pit ID: 135-00019
Reviewer: Trish Earls
Date: March 9, 1998

Material	Emission Unit ID	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	Lb VOC /gal solids	Transfer Efficiency		
Flow Coaters - Permitted																			
Marcus Red	001	7.76	58.99%	0.0%	59.0%	0.0%	28.99%	0.0975	125.0	4.58	4.58	55.79	1338.96	244.36	0.00	15.79	100%		
Toluene	001	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0284	125.0	7.25	7.25	25.74	617.70	112.73	0.00	N/A	100%		
Xylene	001	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0242	125.0	7.25	7.25	21.93	526.35	96.06	0.00	N/A	100%		
Flow Coaters - Unpermitted																			
Marcus Silver	002	7.88	59.19%	0.0%	59.2%	0.0%	27.68%	0.0750	125.0	4.66	4.66	43.73	1049.44	191.52	0.00	16.85	100%		
Toluene	002	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0219	125.0	7.25	7.25	19.85	476.33	86.93	0.00	N/A	100%		
Xylene	002	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0186	125.0	7.25	7.25	16.86	404.55	73.83	0.00	N/A	100%		
Marcus Green	003	7.43	62.01%	0.0%	62.0%	0.0%	28.50%	0.0166	125.0	4.61	4.61	9.56	229.45	41.87	0.00	16.17	100%		
Toluene	003	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0048	125.0	7.25	7.25	4.39	105.27	19.21	0.00	N/A	100%		
Xylene	003	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0041	125.0	7.25	7.25	3.74	89.83	16.39	0.00	N/A	100%		
Marcus Red	004	7.76	58.99%	0.0%	59.0%	0.0%	28.99%	0.0975	125.0	4.58	4.58	55.79	1338.96	244.36	0.00	15.79	100%		
Toluene	004	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0284	125.0	7.25	7.25	25.74	617.70	112.73	0.00	N/A	100%		
Xylene	004	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.0242	125.0	7.25	7.25	21.93	526.35	96.06	0.00	N/A	100%		
Dip Tanks - Permitted																			
Kurfee Red	005	7.54	53.44%	0.0%	53.4%	0.0%	61.62%	0.4230	45.0	4.03	4.03	76.70	1840.78	335.94	0.00	6.54	100%		
Mineral Spirits	005	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	0.0786	45.0	6.43	6.43	22.74	545.83	99.61	0.00	N/A	100%		
Kurfee Green	006	7.50	54.50%	0.0%	54.5%	0.0%	62.70%	0.6840	45.0	4.09	4.09	125.81	3019.52	551.06	0.00	6.52	100%		
Mineral Spirits	006	6.43	100.00%	0.0%	100.0%	0.0%	0.00%	0.1270	45.0	6.43	6.43	36.75	881.94	160.95	0.00	N/A	100%		
Total State Potential Emissions:												567.04	13608.93	2483.63	0.00				
Federal Potential Emissions (controlled):																			
Total Federal Potential Emissions:												Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr		
												VOC	PM						
												0.00%	0.00%	22.60	542.47	99.00	0.00		

NOTE:
Total VOC usage in the dip tanks and flow coaters will be limited to 99.0 tons per year, therefore, the requirements of 326 IAC 8-6-2 (Organic Solvent Emission Limitations) and 326 IAC 2-2 (PSD) do not apply.
Dip tanks 007 through 009 are only used as back-up units when a flow coater or one of dip tanks 005 or 006 are not in service. Use of these tanks would not increase potential emissions.
For the purpose of determining the permitting level for the units being reviewed under ENSR, it was assumed that potential emissions from the unpermitted dip tank 009 are equal to the potential emissions from dip tank 006.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Sum of all coatings and solvents used

**Appendix A: Emissions Calculations
HAP Emission Calculations**

Company Name: R.G. Applegate Steel Company, Inc.
Address City IN Zip: 201 Owens Street, Saratoga, Indiana 47382
Operation Permit No.: T135-7071
Pit ID: 135-00019
Reviewer: Trish Earls
Date: March 9, 1998

Material	Emission Unit ID	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Benzene	Weight % Ethylbenzene	Coating Usage Limitation	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Benzene Emissions (ton/yr)	Ethylbenzene Emissions (ton/yr)
Flow Coaters - Permitted													
Marcus Red	001	7.76	0.0975	125.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Toluene	001	7.25	0.0284	125.0	0.00%	100.00%	0.03%	0.00%	3.99%	0.00	4.50	0.00	0.00
Xylene	001	7.25	0.0242	125.0	83.00%	0.00%	0.00%	17.00%	3.99%	3.18	0.00	0.00	0.65
Flow Coaters - Unpermitted													
Marcus Silver	002	7.88	0.0750	125.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Toluene	002	7.25	0.0219	125.0	0.00%	100.00%	0.03%	0.00%	3.99%	0.00	3.47	0.00	0.00
Xylene	002	7.25	0.0186	125.0	83.00%	0.00%	0.00%	17.00%	3.99%	2.45	0.00	0.00	0.50
Marcus Green	003	7.43	0.0166	125.0	1.00%	0.00%	0.00%	0.00%	3.99%	0.03	0.00	0.00	0.00
Toluene	003	7.25	0.0048	125.0	0.00%	100.00%	0.03%	0.00%	3.99%	0.00	0.77	0.00	0.00
Xylene	003	7.25	0.0041	125.0	83.00%	0.00%	0.00%	17.00%	3.99%	0.54	0.00	0.00	0.11
Marcus Red	004	7.76	0.0975	125.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Toluene	004	7.25	0.0284	125.0	0.00%	100.00%	0.03%	0.00%	3.99%	0.00	4.50	0.00	0.00
Xylene	004	7.25	0.0242	125.0	83.00%	0.00%	0.00%	17.00%	3.99%	3.18	0.00	0.00	0.65
Dip Tanks - Permitted													
Kurfee Red	005	7.54	0.4230	45.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Mineral Spirits	005	6.43	0.0786	45.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Kurfee Green	006	7.50	0.6840	45.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
Mineral Spirits	006	6.43	0.1270	45.0	0.00%	0.00%	0.00%	0.00%	3.99%	0.00	0.00	0.00	0.00
										9.38	13.23	0.00	1.92

24.53

NOTE:
Dip tanks 007 through 009 are only used as back-up units when a flow coater or one of dip tanks 005 or 006 are not in service. Use of these tanks would not increase potential emissions.
For the purpose of determining the permitting level for the units being reviewed under ENSR, it was assumed that potential emissions from the unpermitted dip tank 009 are equal to the potential emissions from dip tank 006.

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs * Material Usage Limitation (%)

Appendix A: Insignificant Activity Emission Calculations
Natural Gas Combustion
MM Btu/hr 0.3 - < 10

Company Name: R.G. Applegate Steel Company, Inc.
Address City IN Zip: 201 Owens Street, Saratoga, Indiana 47382
Operation Permit No.: T135-7071
Pit ID: 135-00019
Reviewer: Trish Earls
Date: March 9, 1998

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.0

17.5

Heat Input Capacity includes:

one (1) incinerator with a primary chamber burner rated at 1.2 MMBtu/hr and a secondary chamber burner rated at 0.8 MMBtu/hr.

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	11.9	11.9	0.6	100.0	5.8	21.0
Potential Emission in tons/yr	0.10	0.10	0.01	0.88	0.05	0.18

Methodology:

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: uncontrolled = 100, Low Nox Burner = 17, Flue gas recirculation = 36

Emission Factors for CO: uncontrolled = 21, Low NOx burner = 15, Flue Gas Recirculation = ND.

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-03-006-03

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