



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 30, 2004

100 North Senate Avenue  
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[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: I/N Tek & I/N Kote / 141-7316-00159

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and

- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**I/N Tek & I/N Kote  
30755 Edison Road  
New Carlisle, Indiana 46552**

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

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

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

Operation Permit No.: T141-7316-00159

Issued by: Original signed by  
Janet G. McCabe, Assistant Commissioner  
Office of Air Quality

Issuance Date: June 30, 2004

Expiration Date: June 30, 2009

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3 and A.4 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)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil-manufacturing source.

Responsible Official:	President, I/N Tek & I/N Kote
Source Address:	30755 Edison Road, New Carlisle, Indiana 46552
Mailing Address:	30755 Edison Road, New Carlisle, Indiana 46552
General Source Phone No.:	574-654-1317
SIC Code:	3316 and 3471
County Location:	St. Joseph County
County Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories (326 IAC 2-2)

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil-manufacturing source consists of two (2) plants:

- (a) I/N Tek (141-00040) is located at 30755 Edison Road, New Carlisle, Indiana; and
- (b) I/N Kote (141-00046) is located at 30755 Edison Road, New Carlisle, Indiana.

Since the two (2) plants are located in contiguous properties, I/N Tek supports I/N Kote and both partnerships are owned by subsidiaries of the same companies, they will be considered one (1) source and assigned plant identification number 141-00159.

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

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

#### **I/N Tek (continuous cold mill (CCM) for the production of cold-rolled steel strips in the coil form)**

(gear modification October 10, 2000 to allow for higher line speed to produce lighter and narrower products for EU1-EU5)

- (a) One (1) pinch roll leveler (EU1), equipped with a baghouse for particulate matter control, exhausted through stack 1, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (b) One (1) flash butt welder (EU2), equipped with a in-line separator and a baghouse for particulate matter control, exhausted through stack 2, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (c) One (1) tension leveler (EU3), equipped with two (2) baghouses for particulate matter

- control, exhausted through stack 3, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (d) One (1) descale acid pickling line (EU4), equipped with a counter-current packed tower scrubber and mist eliminator, exhausted through stack 4, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
  - (e) One (1) tandem cold mill (EU5), equipped with two (2) baffle plate collision mist eliminators, exhausted through stack 5, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
  - (f) One (1) electrolytic cleaning operation (EU6), equipped with a scrubber, exhausted through stack 6, installed on October 15, 1987, nominal capacity: 540,000 pounds per hour of cold rolled steel strip in coil form.
  - (g) One (1) post treatment pickling operation (EU9), equipped with a counter-current packed tower scrubber with a mesh-type mist eliminator, exhausted through stack 9, installed on October 15, 1987, nominal capacity: 540,000 pounds per hour of cold rolled strip steel.
  - (h) One (1) roll shot cabinet (EU11), equipped with a baghouse for particulate matter control, exhausted through stack 11, installed on October 15, 1987, nominal capacity: 20,000 pounds per hour of steel rolls.
  - (i) One (1) natural gas-fired annealing furnace (EU7-1), rated at 222 million British thermal units per hour, controlled by a Bloom 2320 burner or equivalent, exhausted through stack 7, installed on November 3, 1988.
  - (j) One (1) natural gas-fired waste heat boiler (EU7-2), rated at 95.0 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.
  - (k) One (1) natural gas-fired package boiler (EU7-3), rated at 70.8 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.

**I/N Kote (continuous hot dip galvanizing line (CGL))**

- (l) One (1) CGL natural gas-fired, low NO<sub>x</sub> heating furnace (EU21), rated at 113.1 million British thermal units per hour, controlled by low-NO<sub>x</sub> regenerative burners, exhausted through stack 21, installed on November 15, 1991.
- (m) One (1) CGL natural gas-fired, galvannealing furnace (EU22), rated at 30.2 million British thermal units per hour, controlled by low NO<sub>x</sub> burners, exhausted through stack 22, installed on November 15, 1991.
- (n) One (1) natural gas-fired package boiler (EU27), exhausted through stack 27, rated at 71.5 million British thermal units per hour, controlled by flue gas recirculation, installed on November 15, 1991.
- (o) One (1) CGL electrolytic cleaning operation (EU20), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 20, installed on November 15, 1991, nominal capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (p) One CGL skin pass mill (EU31), equipped with a scrubber and a horizontal mist eliminator, exhausted through stack 31, installed on November 15, 1991, nominal capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (q) One (1) CGL sink roll pickling operation (EU32), equipped with a scrubber with vertical mist eliminator, exhausted through stack 32, installed on November 15, 1991, capacity: fume

exhaust 10,000 standard cubic feet per minute.

**I/N Kote (electrolytic galvanizing line (EGL))**

- (r) One (1) EGL surface activation and plating operation (EU24), equipped with a scrubber with vertical mist eliminator, exhausted through stack 24, installed on November 15, 1991, nominal capacity: 135,900 pounds of uncoated cold rolled steel strip.
- (s) One (1) EGL degreasing operation (EU25), equipped with a mist eliminator, exhausted through stack 25, installed on November 15, 1991, nominal capacity 135,900 pounds per hour of uncoated cold rolled steel strip.
- (t) One (1) EGL pre-cleaning operation (EU26), equipped with a mist eliminator, exhausted through stack 26, installed on November 15, 1991, nominal capacity: 135,900 pounds per hour of uncoated cold rolled steel strip.

**Internal combustion engines**

- (u) Three (3) 1000 horsepower switching locomotives, each with a maximum capacity of 26.97 gal/hr of diesel fuel

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (space heaters with a total capacity: 76.3 million British thermal units per hour at the I/N Kote facility only). [CP 141-2750-00040/00046]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6-1]
- (d) Lime storage silo; inspection line electrostatic oiler; electric motor ventilation; skinpass oil room ventilation; wrapping line edge oiler; CGL quench fume. [326 IAC 6-1]

**A.5 Part 70 Permit Applicability [326 IAC 2-7-2]**

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

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

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

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This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

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- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted 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, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall

cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
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, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

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

B.10 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 (PMPs) 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; and
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

Telephone Number: 1-800-753-5519 (ask for Office of Air Quality, Compliance Section)  
NRO Telephone Number: 574-245-4870 (ask for Compliance Section)  
NRO Facsimile Number: 574-245-4877

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

facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

This permit shield does not extend to applicable requirements which are promulgated after

the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

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

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

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

B.14 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 Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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- (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)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.16 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. 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). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
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, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, 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, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, 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, OAQ, 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.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified 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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives,

marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (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 preconstruction approval required by 326 IAC 2-7-10.5 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 Quality  
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, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (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). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require 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, OAQ, or U.S. EPA is required.

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

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

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

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

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

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

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- (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 Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

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

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

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

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

#### C.2 Opacity [326 IAC 2-2]

Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accordance with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.

#### 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. 326 IAC 9-1-2 is 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 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

- (a) Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan detailed in CP 141-2750-00040, issued October 28, 1996. The plan consists of:
  - (1) Since the Industrial Augmentation factor of  $I = 1$  was used for the emissions inventory, vehicles shall be limited to traveling on paved surfaces only and not allowed to enter any paved surface except from public paved roads.
  - (2) Upon request of the Assistant Commissioner, I/N Kote shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures given in Reference 1. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 28.7 pounds per mile.
  - (3) I/N Kote shall test and provide to the Indiana Department of Environmental Man

agement, Office of Air Management, representative silt loading measurements for 3 segments of paved road per month during the months of April through November. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 28.7 pounds of silt per mile.

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

Except as otherwise provided by statute or rule, or 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 units vented to the control equipment is in operation.

C.8 Stack Height [326 IAC 1-7]

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

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification 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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

#### **C.10 Performance Testing [326 IAC 3-6]**

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

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

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

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

#### **C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related 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 Quality  
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).

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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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 December 2, 1996.
- (b) Upon direct notification by IDEM, OAQ, 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.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

- (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do 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.19 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]**

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- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of

this rule”) from the source, for purposes of Part 70 fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) The 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, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and 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 Quality  
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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## **Stratospheric Ozone Protection**

### **C.22 Compliance with 40 CFR 82 and 326 IAC 22-1]**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the 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)]- I/N Tek (continuous cold mill (CCM) for the production of cold-rolled steel strips in the coil form)

(gear modification October 10, 2000 to allow for higher line speed to produce lighter and narrower products for EU1-EU5)

- (a) One (1) pinch roll leveler (EU1), equipped with a baghouse for particulate matter control, exhausted through stack 1, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (b) One (1) flash butt welder (EU2), equipped with a in-line separator and a baghouse for particulate matter control, exhausted through stack 2, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (c) One (1) tension leveler (EU3), equipped with two (2) baghouses for particulate matter control, exhausted through stack 3, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (d) One (1) descale acid pickling line (EU4), equipped with a counter-current packed tower scrubber and mist eliminator, exhausted through stack 4, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (e) One (1) tandem cold mill (EU5), equipped with two (2) baffle plate collision mist eliminators, exhausted through stack 5, installed on October 15, 1987, nominal capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (f) One (1) electrolytic cleaning operation (EU6), equipped with a scrubber, exhausted through stack 6, installed on October 15, 1987, nominal capacity: 540,000 pounds per hour of cold rolled steel strip in coil form.
- (g) One (1) post treatment pickling operation (EU9), equipped with a counter-current packed tower scrubber with a mesh-type mist eliminator, exhausted through stack 9, installed on October 15, 1987, nominal capacity: 540,000 pounds per hour of cold rolled strip steel.
- (h) One (1) roll shot cabinet (EU11), equipped with a baghouse for particulate matter control, exhausted through stack 11, installed on October 15, 1987, nominal capacity: 20,000 pounds per hour of steel rolls.

(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 PSD BACT Limitations [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission rates from the Pinch Roll Leveler (EU1) shall be collected by a hood and exhaust system with a design flow rate of 12,000 scfm exhausting through a baghouse. Particulate matter emissions shall not exceed 0.5 lbs/hr and 2.2 tpy.
- (b) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the entire welding electrode system for the Flash Butt Welder (EU2) shall be enclosed. Particulate matter emissions shall be collected by a ventilation system operating with a design flow rate of 7,956 scfm exhausting through an in-line separator and a baghouse. Particulate matter emissions shall not exceed 0.1 lbs/hr or 0.44 tpy.
- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission rates from the Tension Leveler (EU3) shall be collected by a hood and exhaust system with a design flow rate of 22,732 scfm exhausting through two (2) baghouses. Particulate matter emissions (total from both baghouses) shall not exceed 0.8 lbs/hr and 3.5 tpy.

- (d) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Descaling System's Pickling Tanks (EU4) shall be equipped with water sealed edge covers. Particulate emissions shall be collected under negative pressure by a ventilation system operating with a design flow rate of 35,235 scfm exhausting through a counter-current packed tower scrubber with a mist eliminator installed above the packing. Particulate matter emissions shall not exceed 0.8 lbs/hr and 3.5 tpy.
- (e) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission from Tandem Cold Mill (EU5) enclosure shall be collected by a ventilation system operating with a design flow rate of 147,667 scfm exhausting through two Hitachi Baffle Plate Collision Type 1 (or equivalent) mist eliminators. Particulate matter emissions shall not exceed 6.6 lbs/hr and 28.9 tpy.
- (f) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Electrolytic Cleaning Tanks (EU6) shall be covered and maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 15,912 scfm exhausting through a Ceilcote horizontal air wash (or equivalent). Particulate matter emissions shall not exceed 0.28 lb/hr and 1.2 tpy.
- (g) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Post-Treatment Pickling Tanks (EU9) shall be covered and maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 9,472 scfm exhausting through a counter-current packed tower scrubber with a Chevron or mesh type mist eliminator installed above the packing. Particulate matter emissions shall not exceed 0.2 lbs/hr and 0.88 tpy.
- (h) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Roll Shot Blast Cabinet (EU11) shall be maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 4,164 scfm exhausting through a baghouse. Particulate matter emissions shall not exceed 0.35 lb/hr and 1.5 tpy.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-1]

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Pursuant to 326 IAC 6-1-2(a), the PM emissions from the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3), the Descaling System's Pickling Tanks (EU4), Tandem Cold Mill (EU5), the Electrolytic Cleaning Tanks (EU6), the Post-Treatment Pickling Tanks (EU9) and the Roll Shot Blast Cabinet (EU11) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air

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

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

### Compliance Determination Requirements

#### D.1.4 Particulate Matter (PM)

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- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the baghouse for PM control shall be in operation at all times when the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) are in operation.
- (b) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the scrubbers for PM control shall be in operation at all times when the Descaling System's Pickling Tanks (EU4), Electrolytic Cleaning Tanks (EU6), and Post-Treatment Pickling Tanks (EU9) are in operation.

- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the mist eliminator for PM control shall be in operation at all times when the Tandem Cold Mill (EU5) is in operation.

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

#### **D.1.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) The Permittee shall record the water flow rate of the scrubber used in conjunction with the Descaling System's Pickling Tanks (EU4) at least once per shift when the Descaling System's Pickling Tanks (EU4) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 235 to 470 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning Tanks (EU6) at least once per shift when the Electrolytic Cleaning Tanks (EU6) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 24-48 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) The Permittee shall record the water flow rate of the scrubber used in conjunction with the Post-Treatment Pickling Tanks (EU9) at least once per shift when the Post-Treatment Pickling Tanks (EU9) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 80-159 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be verified for accuracy at least once every six (6) months.

#### **D.1.6 Scrubber Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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An inspection shall be performed each calendar quarter of all scrubbers controlling the Descaling System's Pickling Tanks (EU4), Electrolytic Cleaning Tanks (EU6), and Post-Treatment Pickling Tanks (EU9), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

#### **D.1.7 Scrubber Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a

violation of this permit.

**D.1.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) Quarterly inspections shall be performed on the mist eliminator used in conjunction with the Tandem Cold Mill (EU5) and descale acid pickling line (EU4), to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

**D.1.9 Record Keeping Requirements**

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- (a) In order to document compliance with condition D.1.5, the Permittee shall maintain the once per shift records of the water flow of the scrubbers during normal operation when venting to the atmosphere.
- (b) In order to document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the scrubber inspections required under Condition D.1.6.
- (c) In order to document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the mist eliminator inspections required under Condition D.1.8
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] -I/N Tek combustion

- (i) One (1) natural gas-fired annealing furnace (EU7-1), rated at 222 million British thermal units per hour, controlled by a Bloom 2320 burner or equivalent, exhausted through stack 7, installed on November 3, 1988.
- (j) One (1) natural gas-fired waste heat boiler (EU7-2), rated at 95.0 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.
- (k) One (1) natural gas-fired package boiler (EU7-3), rated at 70.8 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.

(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 Fuel Type [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the annealing furnace (EU7-1) and shall not exceed 222 MMBtu/hr input.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the waste heat boiler (EU7-2) and shall not exceed 95 MMBtu/hr input.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, shall burn only natural gas in the package boiler (EU7-3) and shall not exceed 70.8 MMBtu/hr heat input.

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

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the annealing furnace (EU7-1) shall not exceed 0.003 pounds per million Btu, 0.66 pounds per hour and 2.77 tons per year.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the waste heat boiler (EU7-2) shall not exceed 0.003 pounds per million Btu, 0.285 pounds per hour and 1.25 tons per year.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the package boiler (EU7-3) shall not exceed to 0.003 pounds per million Btu, 0.21 pounds per hour and 0.93 tons per year.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-1]

- (a) Pursuant to 326 IAC 6-1-2(a), the PM emissions from the annealing furnace (EU7-1) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
- (b) Pursuant to 326 IAC 6-1-2(b), the PM emissions from the waste heat boiler (EU7-2) and the package boiler (EU7-3) shall be limited to 0.01 grains per dry standard cubic foot of exhaust air

#### D.2.4 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the annealing furnace (EU7-1) shall be controlled by Bloom 2320 Burner (or equivalent) and shall not exceed 0.43 pounds per million Btu, 95.5 pounds per hour or 418.1 tons per year.

- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the waste heat boiler (EU7-2) shall be controlled by NO<sub>x</sub> suppression-design and flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 4.75 pounds per hour or 20.8 tons per year.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the package boiler (EU7-3) shall be controlled by NO<sub>x</sub> suppression-design and flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 3.54 pounds per hour or 15.5 tons per year.

#### D.2.5 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 these facilities and any control devices.

### **Compliance Determination Requirements**

#### D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326IAC 2-1.1-11]

Within eighteen (18) months after issuance of this permit, the Permittee shall perform NO<sub>x</sub> testing on the annealing furnace (EU7-1) utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

#### D.2.7 Nitrogen Oxides (NO<sub>x</sub>)

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, a Bloom 2320 burner or equivalent controlling the annealing furnace (EU7-1) shall be in operation at all times when the annealing furnace is in operation.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the flue gas recirculation for the waste heat boiler (EU7-2) shall be in operation at all times when the waste heat boiler is in operation.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the flue gas recirculation for the package boiler (EU7-3) shall be in operation at all times when the package boiler is in operation.

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

#### D.2.8 Reporting Requirements

The natural gas boiler certification 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 its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### SECTION D.3

### FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)] - I/N Kote combustion

- (l) One (1) CGL natural gas-fired, low NO<sub>x</sub> heating furnace (EU21), rated at 113.1 million British thermal units per hour, controlled by low-NO<sub>x</sub> regenerative burners, exhausted through stack 21, installed on November 15, 1991.
- (m) One (1) CGL natural gas-fired, galvannealing furnace (EU22), rated at 30.2 million British thermal units per hour, controlled by low NO<sub>x</sub> burners, exhausted through stack 22, installed on November 15, 1991.
- (n) One (1) natural gas-fired package boiler (EU27), exhausted through stack 27, rated at 71.5 million British thermal units per hour, controlled by flue gas recirculation, installed on November 15, 1991.

(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.3.1 Fuel Type [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the CGL heat furnace (EU21) and limited to 113.1 MMBtu/hr input.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the CGL galvannealing furnace (EU22) and limited 30.2 MMBtu/hr input.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, shall burn only natural gas in the package boiler (EU27) and shall not exceed 71.5 MMBtu/hr input.

##### D.3.2 Particulate Matter (PM) [326 IAC 6-1]

- (a) Pursuant to 326 IAC 6-1-2(a), the PM emissions from the CGL heating furnace (EU21) and the CGL galvannealing furnace (EU22) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
- (b) Pursuant to 326 IAC 6-1-2(b), the PM emissions from the package boiler (EU27) shall be limited to 0.01 grains per dry standard cubic foot of exhaust air

##### D.3.3 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL heating furnace (EU21) shall be controlled by low-NO<sub>x</sub> regenerative burners and limited to 0.2 lbs/MMBtu, 22.62 pounds per hour or 99.08 tpy.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL galvannealing furnace (EU22) shall be controlled by low NO<sub>x</sub> burners and limited to 0.39 pounds per million Btu, 11.78 pounds per hour and 51.58 tons per year.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the package boiler (EU27) shall be controlled by flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 3.57 pounds per hour or 15.7 tons per year.

**D.3.4 NSPS Subpart Dc [40 CFR 60.40c] [326 IAC 12]**

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The I/N Kote 71.5 million British thermal units per hour natural gas-fired package boiler (EU27 is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it was constructed after June 9, 1989 and has a heat input capacity greater than 10 million Btu per hour and less than 100 million Btu per hour. Pursuant to this rule, records shall be kept of the amount of fuel combusted each day. All records shall be maintained for a period of two years following the date of such record. There are no other requirements pursuant to this rule because the boiler combusts only natural gas.

**D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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

**Compliance Determination Requirements**

**D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326IAC 2-1.1-11]**

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Within eighteen (18) months after issuance of this permit, the Permittee shall perform NO<sub>x</sub> testing on the heating furnace (EU21) utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

**D.3.7 Nitrogen Oxides (NO<sub>x</sub>)**

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- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, low-NO<sub>x</sub> regenerative burners controlling the heating furnace (EU21) shall be in operation at all times when the heating furnace is in operation.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, low NO<sub>x</sub> burners for the galvannealing furnace (EU22) shall be in operation at all times when the galvannealing furnace is in operation.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the flue gas recirculation for the package boiler (EU27) shall be in operation at all times when the package boiler is in operation.

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

**D.3.8 Record Keeping Requirements**

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- (a) The Permittee shall maintain records necessary to demonstrate compliance with NSPS Subpart Dc (Condition D.3.4) for the package boiler (EU27).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.3.9 Reporting Requirements**

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The natural gas boiler certification 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 its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The natural gas-fired boiler certification does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] - I/N Kote (continuous hot dip galvanizing line (CGL))

- (o) One (1) CGL electrolytic cleaning operation (EU20), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 20, installed on November 15, 1991, nominal capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (p) One CGL skin pass mill (EU31), equipped with a scrubber and a horizontal mist eliminator, exhausted through stack 31, installed on November 15, 1991, nominal capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (q) One (1) CGL sink roll pickling operation (EU32), equipped with a scrubber with vertical mist eliminator, exhausted through stack 32, installed on November 15, 1991, capacity: fume exhaust 10,000 standard cubic feet per minute.

(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.4.1 BACT Limitations [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Electrolytic Cleaning process (EU20), the PM and PM<sub>10</sub> emissions shall be controlled by a ventilation system with a design flow rate of 24,630 standard cubic feet per minute, vented to a horizontal mist eliminator and scrubber. Particulate matter emissions shall not exceed 0.60 lbs/hr and 2.63 tpy.
- (b) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> emissions from the CGL skin pass mill (EU31) shall be controlled by a ventilation system with design flow rate of 11,313 standard cubic feet per minute, exhausted to a fume scrubber. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.
- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> and sulfuric acid mist emissions from the CGL sink roll pickling operation (EU32) shall be controlled by a ventilation system with a design flow rate of 10,000 standard cubic feet per minute, exhausting to a high efficiency scrubber and vertical mist eliminator. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.

#### D.4.2 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a), the PM emissions from the Electrolytic Cleaning process (EU20) and the CGL sink roll pickling operation (EU32) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

#### D.4.3 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 these facilities and the control devices.

### Compliance Determination Requirements

#### D.4.4 Particulate Matter (PM)

Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, the scrubbers for PM control shall be in operation at all times when the Electrolytic Cleaning process (EU20), the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) are in operation.

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

### **D.4.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) The Permittee shall record the water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning process (EU20) at least once per shift when the Electrolytic Cleaning process (EU20) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 42 to 84 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) The Permittee shall record the water flow rate of the scrubber used in conjunction with the CGL skin pass mill (EU31) at least once per shift when the CGL skin pass mill (EU31) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 23 to 46 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) The Permittee shall record the water flow rate of the scrubber used in conjunction with the CGL sink roll pickling operation (EU32) at least once per shift when the CGL sink roll pickling operation (EU32) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 25 to 50 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be verified for accuracy at least once every six (6) months.

### **D.4.6 Scrubber Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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An inspection shall be performed each calendar quarter of all scrubbers controlling the Electrolytic Cleaning process (EU20), CGL skin pass mill (EU31) and CGL sink roll pickling operation (EU32), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

### **D.4.7 Scrubber Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**D.4.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) Quarterly inspections shall be performed on the mist eliminator used in conjunction with the Electrolytic Cleaning process (EU20), the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

**D.4.9 Record Keeping Requirements**

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- (a) In order to document compliance with condition D.4.5, the Permittee shall maintain the once per shift records of the water flow of the scrubbers during normal operation when venting to the atmosphere.
- (b) In order to document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the scrubber inspections required under Condition D.4.6.
- (c) In order to document compliance with Condition D.4.8, the Permittee shall maintain records of the results of the mist eliminator inspections required under Condition D.4.8.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.5 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] - I/N Kote electrolytic galvanizing line

- (r) One (1) EGL surface activation and plating operation (EU24), equipped with a scrubber with vertical mist eliminator, exhausted through stack 24, installed on November 15, 1991, nominal capacity: 135,900 pounds of uncoated cold rolled steel strip.
- (s) One (1) EGL degreasing operation (EU25), equipped with a mist eliminator, exhausted through stack 25, installed on November 15, 1991, nominal capacity 135,900 pounds per hour of uncoated cold rolled steel strip.
- (t) One (1) EGL pre-cleaning operation (EU26), equipped with a mist eliminator, exhausted through stack 26, installed on November 15, 1991, nominal capacity: 135,900 pounds per hour of uncoated cold rolled steel strip.

(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.5.1 BACT Limitations [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM10/PM and sulfuric acid mist emissions for the Surface Activation and Plating (EU24) shall be controlled by a ventilation system with a design flow rate of 41,480 scfm vented to a vertical mist eliminator and scrubber. Particulate matter emissions shall not exceed 2.09 pounds per hour and 9.15 tons per year.
- (b) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the particulate matter limit for the EGL Degreasing Section (EU25) shall be controlled by a ventilation system with a design flow rate of 3,117 scfm venting to a mist eliminator. Particulate matter emissions shall not exceed 0.10 pounds per hour and 0.44 tons per year.
- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM10/PM and alkaline solution mist generated from the EGL Pre-cleaning Section (EU26) shall be controlled by a ventilation system with a design flow rate of 2,981 scfm vented to a mist eliminator. Particulate matter emissions shall not exceed 0.10 pounds per hour and 0.44 tons per year.

#### D.5.2 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2(a), the PM emissions from Surface Activation and Plating (EU24), EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

#### D.5.3 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 these facilities and the control devices.

### Compliance Determination Requirements

#### D.5.4 Particulate Matter (PM)

The scrubbers and/or mist eliminators for PM control shall be in operation at all times when the Surface Activation and Plating (EU24), EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) are in operation and exhausting to the outside atmosphere.

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

### **D.5.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

The Permittee shall record the water flow rate of the scrubber used in conjunction with the Surface Activation and Plating (EU24) at least once per shift when the Surface Activation and Plating (EU24) is in operation and when venting to the atmosphere. When for any one reading, the water flow rate of the scrubber is outside the normal range of 65 to 135 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be verified for accuracy at least once every six (6) months.

### **D.5.6 Scrubber Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

An inspection shall be performed each calendar quarter of all scrubbers controlling the Surface Activation and Plating (EU24), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

### **D.5.7 Scrubber Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

### **D.5.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

- (a) Quarterly inspections shall be performed on the mist eliminator used in conjunction with the EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

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

### **D.5.9 Record Keeping Requirements**

- (a) In order to document compliance with condition D.5.5, the Permittee shall maintain the once per shift records of the water flow of the scrubbers during normal operation when venting to the atmosphere.
- (b) In order to document compliance with Condition D.5.6, the Permittee shall maintain records of the results of the scrubber inspections required under Condition D.5.6.
- (c) In order to document compliance with Condition D.5.8, the Permittee shall maintain records of the results of the mist eliminator inspections required under Condition D.5.8.

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

## SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (space heaters with a total capacity: 76.3 million British thermal units per hour at the I/N Kote facility only)
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches soldering equipment, welding equipment.
- (d) Lime storage silo; inspection line electrostatic oiler; electric motor ventilation; skinpass oil room ventilation; wrapping line edge oiler; CGL quench fume.

(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.6.1 Fuel Type [326 IAC 2-2]

Pursuant to CP 141-2750-00040/00046, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Space Heaters shall burn only natural gas and not exceed a total of 76.3 MMBtu/hr heat input at the I/N Kote facility only.

#### D.6.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

The I/N Tek & I/N Kote facilities are subject to the requirements of 326 IAC 8-3-2 (Organic Solvent Degreasing Operations) because the units were built after January 1, 1980 and performs organic solvent degreasing operations in the state. The owner or operator of a cold cleaning facility shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.6.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser facilities existing prior to January 1, 1990 shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>°</sup>C) (one hundred degrees Fahrenheit (100<sup>°</sup>F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>°</sup>C) (one hundred degrees Fahrenheit (100<sup>°</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>°</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>°</sup>F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.6.4 Particulate Matter (PM) [326 IAC 6-1]

Pursuant to 326 IAC 6-1-2, the allowable PM emission rate from the brazing equipment, cutting torches, soldering and welding equipment, lime storage silo, inspection line electrostatic oiler, electric motor ventilation, skinpass oil room ventilation, wrapping line edge oiler, and CGL quench fume shall not exceed allowable PM emission rate of 0.03 grains per dry standard cubic foot of exhaust air.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)] - Internal Combustion Engines**

- (u) Three (3) 1000 horsepower switching locomotives, each with a maximum capacity of 26.97 gal/hr of diesel fuel

(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.7.1 Operational Limit [326 IAC 2-2]**

The total input of diesel fuel to the three (3) 1000 hp diesel fired switching locomotives (internal combustion engines) shall be less than 304,000 total gallons per 12 consecutive month period rolled monthly. This usage limit is required to limit the potential to emit of nitrogen oxides (NO<sub>x</sub>) to 121.03 tons per year, carbon monoxide (CO) to 12.72 tons per year and PM/PM10 to less than 3.06 tons per year, each.

**Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

**D.7.2 Record Keeping Requirements**

- (a) To document compliance with Conditions D.7.1, the Permittee shall maintain records of the monthly use of diesel fuel, in gallons.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.7.3 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.7.1 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. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: I/N Tek & I/N Kote  
Source Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Mailing Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-7316-00159

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: I/N Tek & I/N Kote  
Source Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Mailing Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-7316-00159

**This form consists of 2 pages**

**Page 1 of 2**

This is an emergency as defined in 326 IAC 2-7-1(12)

- C The Permittee must notify the Office of Air Quality (OAQ), 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) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

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

**Page 2 of 2**

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

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

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

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

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

A certification is not required for this report.

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

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: I/N Tek & I/N Kote  
Source Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Mailing Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-7316-00159

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

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature: _____
Printed Name: _____
Title/Position: _____
Phone: _____
Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

## Part 70 Quarterly Report

Source Name: I/N Tek & I/N Kote  
Source Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Mailing Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-7316-00159  
Facility: Internal Combustion Engines (switching locomotives)  
Parameter: gallons of diesel fuel usage  
Limit: less than 304,000 total gallons per 12 consecutive month period rolled monthly

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

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
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 QUALITY  
COMPLIANCE DATA SECTION**

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

Source Name: I/N Tek & I/N Kote  
Source Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Mailing Address: 30755 Edison Road, New Carlisle, Indiana 46552  
Part 70 Permit No.: T141-7316-00159

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

Page 1 of 2

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

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

Form Completed By: \_\_\_\_\_

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

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

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

Attach a signed certification to complete this report.

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

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

**Source Name:** I/N Tek & I/N Kote  
**Source Location:** 30755 Edison Road, New Carlisle, Indiana 46552-9695  
**County:** St. Joseph  
**SIC Code:** 3316 & 3471  
**Operation Permit No.:** T141-7316-00159  
**Permit Reviewer:** Teresa Freeman

On September 10, 2003, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, South Bend, Indiana stating that I/N Tek & I/N Kote had applied for a Part 70 Operating Permit to operate a stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil manufacturing source. The notice also stated that OAQ 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 sixty (60) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ 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. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

**Change 1:**

The title of condition B.7 has been revised as follows:

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

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**Change 2:**

The title of condition B.21, Inspection and Entry, has been revised to include an additional rule cite as follows:

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

**Change 3:**

IDEM has revised the condition C.8 Stack Height (C.7 in the draft permit) in order to clarify which parts of the regulation are not federally enforceable as follows:

C.8 Stack Height [326 IAC 1-7]

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

**Change 4:**

In condition C.10(c), (C.9 in the draft permit) the term “source” is replaced with “Permittee” as follows:

C.10 Performance Testing [326 IAC 3-6]

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- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

**Change 5:**

In condition C.16(C.15 in the draft permit), the term “source” is replaced with “Permittee”. In addition, the specific requirements from the rule are removed and replaced by referencing the applicable rule as follows:

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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If a regulated substance, ~~subject to as defined in 40 CFR 68,~~ is present at a source in more than a threshold quantity, **the Permittee must comply with the 40 CFR 68 is an applicable requirement of 40 CFR 68.** ~~and the Permittee shall submit:~~

- ~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~
- ~~(b) As a part of the annual 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);~~

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

**Change 6:**

Condition C.17 (C.16 in the draft permit) - Compliance Response Plan - Preparation, Implementation, Records, and Reports has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. In addition if a source is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP. The changes to condition C.17 are as follows:

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

---

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions.** A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** to include such response steps taken.

**The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.**

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)**; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan **or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)** is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be ten (10) days or more until the unit or device will be shut down, the Permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down. **The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall ~~constitute a violation of~~ **be considered a deviation from** the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when, **in accordance with Section D**, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

#### Change 7:

The following revisions were made to the Emission Statement condition to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register. I/N Kote and I/N Tek must submit an emission statement yearly, because they have a PTE for PM10 of greater than 250 tons per year.

#### C.19 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 April 15 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:~~

**(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) Indicate estimated actual emissions of ~~criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **all pollutants listed in 326 IAC 2-6-4(a);**
- (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

#### **The statement must be submitted to:**

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

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

**(eb)** 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, OAQ, on or before the

date it is due.

- (d) ~~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, OAQ, on or before the date it is due.~~

### Change 8:

In condition C.21, (C.20 in the draft permit) the term "source" is replaced with "Permittee" as follows:

#### C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

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- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### Change 9:

Conditions D.1.3, D.2.5, D.3.4, D.4.3 and D.5.3 have been removed from the Part 70 Operating Permit. These conditions are not necessary in the Part 70 permit because the project, when permitted in 1996 was minor for these pollutants and otherwise do not constitute enforceable conditions.

#### ~~D.1.3 PSD Significance Levels [326 IAC 2-2] [40 CFR 52.21]~~

---

~~Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Tek emissions of sulfur dioxide, carbon monoxide, volatile organic compounds, lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, sulfuric acid mist and total reduced sulfur compounds (including hydrogen sulfide) shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.~~

#### ~~D.2.5 PSD Significance Levels [326 IAC 2-2] [40 CFR 52.21]~~

---

~~Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Tek emissions of sulfur dioxide, carbon monoxide, volatile organic compounds, lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, sulfuric acid mist and total reduced sulfur compounds (including hydrogen sulfide) shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.~~

#### ~~D.3.4 PSD Significance Levels [326 IAC 2-2] [40 CFR 52.21]~~

---

~~Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Kote emissions of lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, hydrogen sulfide, total reduced sulfur and reduced sulfur compounds shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.~~

#### ~~D.4.3 PSD Significance Levels [326 IAC 2-2] [40 CFR 52.21]~~

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~~Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Kote emissions of lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, hydrogen sulfide, total reduced sulfur and reduced sulfur compounds shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.~~

#### ~~D.5.3 PSD Significance Levels [326 IAC 2-2] [40 CFR 52.21]~~

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~~Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Kote emissions of lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, hydrogen sulfide, total reduced sulfur and reduced sulfur compounds shall not exceed the annual significant emission levels established in 40~~

~~CFR 52.21 and 326 IAC 2-2.~~

Subsequent conditions in each D section are renumbered accordingly.

**Change 10:**

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18, 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language will be incorporated into the permit to address credible evidence:

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

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

**Change 11:**

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, Condition A.1 is revised as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil-manufacturing source.

Responsible Official:	President, I/N Tek & I/N Kote
Source Address:	30755 Edison Road, New Carlisle, Indiana 46552
Mailing Address:	30755 Edison Road, New Carlisle, Indiana 46552
General Source Phone No.:	574-654-1317
SIC Code:	3316 and 3471
County Location:	St. Joseph County
County Status:	<b>Nonattainment for 8-hour ozone standard</b>
Source Status:	Attainment for all <b>other</b> criteria pollutants Part 70 Permit Program Major Source, under PSD; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories (326 IAC 2-2)

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

**County Attainment Status**

The source is located in St. Joseph County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
1-hour Ozone	attainment
8-hour Ozone	<b>nonattainment</b>
CO	attainment
Lead	attainment

- (a) **Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are precursors for the formation of ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.**

On November 6, 2003, I/N Tek & I/N Kote submitted comments on the proposed Part 70 permit. The comments and IDEM responses (with language added shown in bold and language in strikethrough) are as follows:

**Comment 1:**

As one general comment we believe that there are a number of new monitoring requirements for individual emission units that have very low (much less than 10 pounds per hour) allowable emissions for particulate matter (PM). It has been our understanding that IDEM policy was not to require compliance monitoring for such small emission units with allowable emissions below 10 pounds per hour, and we believe that this is an appropriate approach to ensuring that we use our environmental compliance resources to focus on larger emission units. We further understand that the parametric monitoring requirements, which have been included in the proposed permit for units with allowable emissions less than 10 pounds per hour, were included because the emission limits were originally established as part of a permit issued under the Prevention of Significant Deterioration (PSD) permit regulations. While we do not agree that this should be used as an across the board criteria for the inclusion of such monitoring requirements for relatively small emission units, we do intend to proceed to procure and install the required monitoring equipment for those processes which are controlled by wet scrubbers. For some of the processes controlled by baghouse units, we continue to believe that the monitoring requirements will achieve little if any benefit.

**Response 1:**

IDEM has the authority under 326 IAC 2-7-5 to add compliance monitoring provisions to the Part 70 permit, as necessary to assure continuous compliance with all of the emission limitations in the permit. Compliance monitoring requirements for emission units and pollution control devices are developed on a case by case basis. One factor that has been taken into account in this case is the need to operate the control equipment to meet the limitations. Compliance monitoring issues have been addressed in numerous comments within this addendum, in some instances it has been determined that the compliance monitoring requirements can be revised.

**Comment 2:**

**Section A.1, General Information.** Please identify the Responsible Official by the following Title, rather than by specific name: President, I/N Tek & I/N Kote.

**Response 2:**

Section A.1 has been changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil manufacturing source.

Responsible Official:	<del>Gary Van Asperen</del> <b>Gary Van Asperen, President, I/N Tek &amp; I/N Kote</b>
Source Address:	30755 Edison Road, New Carlisle, Indiana 46552
Mailing Address:	30755 Edison Road, New Carlisle, Indiana 46552
General Source Phone No.:	574-654-1317
SIC Code:	3316 and 3471
County Location:	St. Joseph County
County Status:	Nonattainment for 1-hour ozone and 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD; Minor Source, Section 112 of the Clean Air Act 1 of 28 Source Categories (326 IAC 2-2)

**Comment 3:**

**Section A.2, Part 70 Source Definition.** In order to properly describe the ownership of this facility we would request that the last paragraph of this section be modified to read as follows: "Since the two (2) plants are located on contiguous properties, I/N Tek supports I/N Kote and both partnerships are owned by subsidiaries of the same companies, they will be considered one (1) source and assigned plant identification number 141-00159."

**Response 3:**

Section A.2 has been changed as follows:

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil manufacturing source consists of two (2) plants:

- (a) I/N Tek (141-00040) is located at 30755 Edison Road, New Carlisle, Indiana; and
- (b) I/N Kote (141-00046) is located at 30755 Edison Road, New Carlisle, Indiana.

Since the two (2) plants are located in contiguous properties, I/N Tek supports I/N Kote and ~~are owned by one (1) company~~ **both partnerships are owned by subsidiaries of the same companies**, they will be considered one (1) source and assigned plant identification number 141-00159.

**Comment 4:**

**Section A.3, D.1, D.4 Emission Units and Pollution Control Equipment Descriptions.** We request that the description of the overall facility production levels for the continuous cold mill (CCM) the continuous hot dip galvanizing line (CGL) and the electrolytic galvanizing line (EGL) be eliminated. This would include the production values of 1.55 million tons per year for the CCM, and 500,000 tons/year for the CGL and EGL. These values are inconsistent with the rated capacities used for the individual emission units. We believe that the capacities for the individual units should be adequate for the description of the source. We would also request that where individual unit descriptions refer to capacity values, that the word "nominal" be put in front of the word capacity.

**Section A.3(c), D.1(c), D.1.1(c)** The tension leveler is equipped with two baghouses rather than one, with both exhausting through a single stack (No.3).

**Section A.3 (e), D.1 (e).** The tandem cold mill is equipped with two mist eliminators rather than

one, with both exhausting through a single stack (No. 5).

**Section A.3 (p), D.4(p), D.4.1(b), D.4.2, D.4.6, D.4.7(b), D.4.8, and D.4.10.** The CGL AS-E Treatment operation is no longer at the facility. As such these sections of the permit should either be eliminated or modified to remove references to this emissions unit.

**Section A.3(s) and D.5(s), D.5.1(a).** The description should be modified to indicate there is a vertical rather than a horizontal mist eliminator for the EGL surface activation and plating operation (EU24).

**Section A.3 (v) and D.7.** These sections should be modified to indicate there are three locomotives rather than two. All three would be subject to the fuel use restrictions in D.7.1.

#### Response 4:

The following changes have been made in condition A.3 and description boxes D.1, D.4, D.5 and D.7:

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

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

**I/N Tek (continuous cold mill (CCM) for the production of ~~1.55 million tons per year on an annual basis of cold-rolled steel strips in the coil form~~**

(gear modification October 10, 2000 to allow for higher line speed to produce lighter and narrower products for EU1-EU5)

- (a) One (1) pinch roll leveler (EU1), equipped with a baghouse for particulate matter control, exhausted through stack 1, installed on October 15, 1987, **nominal** capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (b) One (1) flash butt welder (EU2), equipped with a in-line separator and a baghouse for particulate matter control, exhausted through stack 2, installed on October 15, 1987, **nominal** capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (c) One (1) tension leveler (EU3), equipped with **a two (2) baghouses** for particulate matter control, exhausted through stack 3, installed on October 15, 1987, **nominal** capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (d) One (1) descale acid pickling line (EU4), equipped with a counter-current packed tower scrubber and mist eliminator, exhausted through stack 4, installed on October 15, 1987, **nominal** capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (e) One (1) tandem cold mill (EU5), equipped with **a two (2) baffle plate collision mist eliminators**, exhausted through stack 5, installed on October 15, 1987, **nominal** capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (f) One (1) electrolytic cleaning operation (EU6), equipped with a scrubber, exhausted through stack 6, installed on October 15, 1987, **nominal** capacity: 540,000 pounds per hour of cold rolled steel strip in coil form.
- (g) One (1) post treatment pickling operation (EU9), equipped with a counter-current packed tower scrubber with a mesh-type mist eliminator, exhausted through stack 9, installed on October 15, 1987, **nominal** capacity: 540,000 pounds per hour of cold rolled strip steel.
- (h) One (1) roll shot cabinet (EU11), equipped with a baghouse for particulate matter control, exhausted through stack 11, installed on October 15, 1987, **nominal** capacity: 20,000

pounds per hour of steel rolls.

- (i) One (1) natural gas-fired annealing furnace (EU7-1), rated at 222 million British thermal units per hour, controlled by a Bloom 2320 burner or equivalent, exhausted through stack 7, installed on November 3, 1988.
- (j) One (1) natural gas-fired waste heat boiler (EU7-2), rated at 95.0 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.
- (k) One (1) natural gas-fired package boiler (EU7-3), rated at 70.8 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.

**I/N Kote (continuous hot dip galvanizing line (CGL) ~~to zinc coat 500,000 tons per year~~)**

- (l) One (1) CGL natural gas-fired, low NO<sub>x</sub> heating furnace (EU21), rated at 113.1 million British thermal units per hour, controlled by low-NO<sub>x</sub> regenerative burners, exhausted through stack 21, installed on November 15, 1991.
- (m) One (1) CGL natural gas-fired, galvannealing furnace (EU22), rated at 30.2 million British thermal units per hour, controlled by low NO<sub>x</sub> burners, exhausted through stack 22, installed on November 15, 1991.
- (n) One (1) natural gas-fired package boiler (EU27), exhausted through stack 27, rated at 71.5 million British thermal units per hour, controlled by flue gas recirculation, installed on November 15, 1991.
- (o) One (1) CGL electrolytic cleaning operation (EU20), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 20, installed on November 15, 1991, **nominal** capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- ~~(p) One (1) CGL AS-E treatment operation (EU23), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 23, installed on November 15, 1991, capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.~~
- (~~pp~~) One CGL skin pass mill (EU31), equipped with a scrubber and a horizontal mist eliminator, exhausted through stack 31, installed on November 15, 1991, **nominal** capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (~~fq~~) One (1) CGL sink roll pickling operation (EU32), equipped with a scrubber with vertical mist eliminator, exhausted through stack 32, installed on November 15, 1991, capacity: fume exhaust 10,000 standard cubic feet per minute.

**I/N Kote (electrolytic galvanizing line (EGL) ~~to electroplate 500,000 tons per year~~)**

- (~~sr~~) One (1) EGL surface activation and plating operation (EU24), equipped with a scrubber with ~~horizontal~~ **vertical** mist eliminator, exhausted through stack 24, installed on November 15, 1991, **nominal** capacity: 135,900 pounds of uncoated cold rolled steel strip.
- (~~ts~~) One (1) EGL degreasing operation (EU25), equipped with a mist eliminator, exhausted through stack 25, installed on November 15, 1991, **nominal** capacity 135,900 pounds per hour of uncoated cold rolled steel strip.
- (~~ut~~) One (1) EGL pre-cleaning operation (EU26), equipped with a mist eliminator, exhausted through stack 26, installed on November 15, 1991, **nominal** capacity: 135,900 pounds per hour of uncoated cold rolled steel strip.

### Internal combustion engines

- (vu) ~~Two (2)~~ **Three (3)** 1000 horsepower switching locomotives, each with a maximum capacity of 26.97 gal/hr of diesel fuel

The following changes have been made to condition D.1.1(c):

#### D.1.1 PSD BACT Limitations [326 IAC 2-2]

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- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission rates from the Tension Leveler (EU3) shall be collected by a hood and exhaust system with a design flow rate of 22,732 scfm exhausting through **a two (2) baghouses**. Particulate matter emissions (**total from both baghouses**) shall not exceed 0.8 lbs/hr and 3.5 tpy.

The following change has been made to condition D.4.1:

#### D.4.1 BACT Limitations [326 IAC 2-2] [40 CFR 52.21]

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- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Electrolytic Cleaning process (EU20), the PM and PM<sub>10</sub> emissions shall be controlled by a ventilation system with a design flow rate of 24,630 standard cubic feet per minute, vented to a horizontal mist eliminator and scrubber. Particulate matter emissions shall not exceed 0.60 lbs/hr and 2.63 tpy.
- ~~(b) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the particulate matter from the CGL AS-E Treatment Operation (EU23) controlled by a ventilation system with a design flow rate of 15,160 standard cubic feet per minute, exhausted through a horizontal mist eliminator and scrubber. Particulate emissions shall not exceed 0.27 lb/hr and 1.18 tpy.~~
- (eb) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> emissions from the CGL skin pass mill (EU31) shall be controlled by a ventilation system with design flow rate of 11,313 standard cubic feet per minute, exhausted to a fume scrubber. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.
- (ec) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> and sulfuric acid mist emissions from the CGL sink roll pickling operation (EU32) shall be controlled by a ventilation system with a design flow rate of 10,000 standard cubic feet per minute, exhausting to a high efficiency scrubber and vertical mist eliminator. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.

The following change has been made to condition D.4.2:

#### D.4.2 Particulate Matter (PM) [326 IAC 6-1]

---

Pursuant to 326 IAC 6-1-2(a), the PM emissions from the Electrolytic Cleaning process (EU20), ~~the CGL AS-E Treatment Operation (EU23)~~, the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air.

The following change has been made to condition D.4.4 (D.4.6 in the draft permit):

#### D.4.4 Particulate Matter (PM)

---

Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, the scrubbers for PM control shall be in operation at all times when the Electrolytic Cleaning process (EU20), ~~the CGL AS-E Treatment Operation (EU23)~~, the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) are in operation.

The following changes have been made to condition D.4.5 (D.4.7 in the draft permit):

D.4.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning process (EU20) at least once per shift when the Electrolytic Cleaning process (EU20) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 0.5-2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 13 to 26 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- ~~(b) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL AS-E Treatment Operation (EU23) at least once per shift when the CGL AS-E Treatment Operation (EU23) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 0.5-2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 7 to 13 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.~~
- (eb) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL skin pass mill (EU31) at least once per shift when the CGL skin pass mill (EU31) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 9.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 67 to 134 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (ec) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL sink roll pickling operation (EU32) at least once per shift when the CGL sink roll pickling operation (EU32) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 4.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 100 to 200 gallons per minute or a range established during the latest stack test,

the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The following change has been made to condition D.4.6:

D.4.6 Scrubber Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all scrubbers controlling the Electrolytic Cleaning process (EU20), ~~CGL AS-E Treatment Operation (EU23)~~, CGL skin pass mill (EU31) and CGL sink roll pickling operation (EU32), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

The following change has been made to condition D.4.8 (D.4.9 in the draft permit)::

D.4.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) Monthly inspections shall be performed on the mist eliminator used in conjunction with the Electrolytic Cleaning process (EU20), ~~the CGL AS-E Treatment Operation (EU23)~~, the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

The following change has been made to condition D.5.1 (a):

D.5.1 BACT Limitations [326 IAC 2-2]

- (a) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM10/PM and sulfuric acid mist emissions for the Surface Activation and Plating (EU24) shall be controlled by a ventilation system with a design flow rate of 41,480 scfm vented to a ~~horizontal~~ **vertical** mist eliminator and scrubber. Particulate matter emissions shall not exceed 2.09 pounds per hour and 9.15 tons per year.

**Comment 5:**

**Section A.4(a) and D.6(a).** These sections identify space heaters with a combined heat input of 76.3 MMBtu/hour. It should be indicated that this is the capacity for space heating at the I/N Kote facility only, as described in the original permits.

**Response 5:**

Based on the information in the construction permit, IDEM concurs with the change suggested by the Permittee. The following change was made to condition A.4 (a) and description box D.6:

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

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (space heaters with a total capacity: 76.3 million British thermal units per hour **at the I/N Kote facility only**). [CP 141-2750-

00040/00046]

**Comment 6:**

**Condition B.14, Deviations from Permit Requirements and Conditions:** This section contains a very broad definition of a deviation that we believe does not appropriately deal with the practical ability to obtain 100% of all compliance monitoring data. As a practical matter, it will not always be possible to obtain 100% of the required data, and a number of federal regulations deal with this issue by requiring that the data capture standard be 95%. We believe this is a more practical approach than the one provided for in Condition B.14, and we request that such a data capture standard be included in this condition.

**Response 6:**

The requirements in condition B.14 follow the intent of the Part 70 permit program to ensure continuous compliance with the applicable requirements. Unlike some specific applicable requirements, 326 IAC 2-7-5(3) does not establish a less than 100% data capture standard. Therefore, the department has required that compliance monitoring data for the complete duration of the operation should be assessed for ascertaining compliance. The department usually handles concerns about the non-availability of 100% of compliance monitoring data as expressed by the commentator by exercising "enforcement discretion" to pursue or not to pursue these matters. The Enforcement Section of the department works closely with the Permittee to understand, in great detail, the physical constraints or realistic factors influencing the information availability. The department uses a case-by-case evaluation of the missing information in order to exercise the enforcement discretion. Therefore, no changes are made to any permit conditions.

**Comment 7:**

**Condition C.1, Opacity.** This condition includes a limit of 30% opacity based on the requirements of 326 IAC 5-1. We believe that the correct limit is 40% opacity, since we are not located north of Kern Road and east of Pine Road in St. Joseph County. (See 326 IAC 5-1-1c(6)). We do recognize that the specific limitations for our process units include more stringent opacity limits that we must meet, but believe that this condition should reflect the proper limits of the referenced regulation.

**Response 7:**

IDEM has confirmed that the source is not located north of Kern Road and east of Pine Street in St. Joseph County. Therefore the following change has been made to condition C.1:

**C.1 Opacity [326 IAC 5-1]**

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

- (a) Opacity shall not exceed an average of ~~thirty percent (30%)~~ **forty percent (40%)** in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**Comment 8:**

**Conditions C.2, C.3 and C.4.** We believe that these conditions should be amended to note that the requirements are only enforceable by the state and are not federally enforceable.

### Response 8:

The following changes have been made to conditions C.3, C.4 and C.5 (C.2, C.3 and C.4 in the draft permit):

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

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

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

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

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

### Comment 9:

**Condition C.5, Fugitive Dust:** We have been implementing the fugitive dust requirements identified in this condition for a number of years and believe that little or no environmental benefit is achieved by some of these provisions. Specifically we see little benefit from the flushing operations contained in C.5 (a)(1). We request that the requirement for road flushing be eliminated from this condition. We would continue to conduct sampling to verify compliance with the silt-loading limit.

### Response 9:

IDEM concurs with the change, because all of the roads are paved and the facility is located in a rural setting, there is not a significant impact from PM. The Permittee shall continue to conduct sampling to verify compliance with the silt-loading limit. The following changes have been made to condition C.5:

#### C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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(a) Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan detailed in CP 141-2750-00040, issued October 28, 1996. The plan consists of:

~~(1) That all roads and parking areas shall be paved. Fugitive dust emission from the paved roads and parking lots shall be controlled by the daily application of water flushing during the months of April through October to reduce uncontrolled emissions by at least 90 percent and down to 28.7 pounds of silt per mile.~~

(21) Since the Industrial Augmentation factor of  $I = 1$  was used for the emissions inventory, vehicles shall be limited to traveling on paved surfaces only and not allowed to enter any paved surface except from public paved roads.

(32) Upon request of the Assistant Commissioner, I/N Kote shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures given in Reference 1. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 28.7 pounds per mile.

(43) I/N Kote shall test and provide to the Indiana Department of Environmental Man

agement, Office of Air Management, representative silt loading measurements for 3 segments of paved road per month during the months of April through November. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 28.7 pounds of silt per mile.

- ~~(5) — Exceptions — Cleaning of paved road segments and parking lots may be delayed by one day when:~~
- ~~(A) — 0.1 or more inches of rain has accumulated during the 24 hour period prior to the scheduled cleaning, or~~
  - ~~(B) — the road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access, or~~
  - ~~(C) — it is raining at the time of the scheduled cleaning.~~

**Comment 10:**

**Condition C.13, Pressure Gauge and Other Instrument Specifications:** We request that C.13 (a) be amended to allow the use of a gauge that has a scale such that the expected normal reading shall be no less the ten percent (10%) of full scale. Using a standard 0 - 10 inches of water pressure drop gauge, normal readings could be as low as 1.0 inches of water. The precision of any instrument should be determined by the specifications of the manufacturer. We also request that the first sentence of C.13(c) be amended to read as follows: *“The Permittee may use, with IDEM OAQ’s approval a pressure gauge or other instrument that does not meet the above specifications provided the Permittee ....”*

**Response 10:**

The scale of a gauge is an important factor in providing reasonable assurance of compliance with applicable requirements with a certain degree of accuracy. According to C.13 (a), the gauges employed to measure pressure drop should have a scale such that normal readings shall be no less than 20% of full scale. Therefore, if the maximum reading on a scale in a meter is very large (say 100 inches of water) and optimum operating conditions for the equipment for which this meter is used fall in relatively small values (say 1-4 inches of water), any variations in the parameter may not be easily observable. In such cases both the accuracy and reliability of data will be questionable. Therefore, the department has established the criteria of 20% to use for range on the scale for gauges to ensure accuracy and reliability of measurements. The Permittee should provide more detailed information about instances where certain constraints prohibit application of 20% criteria for gauges and the department intends to evaluate this on a case-by-case basis in order to provide the flexibility and still meet the compliance assurance objective. Pressure drop monitoring for all baghouses and scrubbers has been removed from this permit. There is no change made to this permit.

**Comment 11:**

**Condition C.14, Emergency Reduction Plans:** We submitted an Emergency Reduction Plan with our Title V permit application in 1996 (Copy attached). We request that this condition be modified to recognize this submittal.

**Response 11:**

The Condition C.15 (C.14 in the draft permit) is revised to reflect this change:

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]  
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- ~~(a) — The Permittee shall prepare written emergency reduction plans (ERPs) consistent with~~

~~safe operating procedures.~~

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

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

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

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

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

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

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

~~(f) Upon direct notification by IDEM, OAQ, 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]~~

**(a) The Permittee prepared and submitted written emergency reduction plans (ERPs)  
consistent with safe operating procedures on December 2, 1996.**

**(b) Upon direct notification by IDEM, OAQ, 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]**

**Comment 12:**

**Condition C.15, Risk Management Plans:** The wording of this condition does not reflect the current model permit language for this condition. We believe that the model language is more appropriate for the Part 70 permit, and request that the most current model language be substituted for the proposed language.

**Response 12:**

Change 5, shown earlier in this document reflects the present version of this condition.

**Comment 13:**

**Condition C.16 Compliance Response Plan – Failure to Take Response Steps:** 40 CFR Part 70 nor 326 IAC 2-7 provides no apparent authority to require the preparation of a Compliance Response Plan (CRP) or to establish the basis for a violation of the permit for failure to conduct the identified response steps. Failure to take specific response steps should not be interpreted in any way as evidence of non-compliance with an underlying applicable requirement, which is implied by this permit condition. We request that all references to a CRP be eliminated from this permit.

We are also concerned that paragraph (b)(3) of this condition is confusing and may in fact conflict with other sections of the permit. This section requires the source to notify IDEM, if as a result of actions related to the compliance response plan, we chose to shut down an emission unit. The Emergency provisions already provide for appropriate notice requirements for emergencies, and other provisions in the "D" sections of the permit have requirements for failed control units. We can envision circumstances where we would chose to shut down an emissions units, even though we are not exceeding an emission limit or encountering an emergency. We see no practical value in having to notify IDEM of such an event, nor are we aware of any specific authority for such a requirement to be included in the permit. As such we request that paragraph (b)(3) be eliminated from the permit.

We would request that the word "and" be added at the end off paragraph C.16(a)(1). We also request that the first sentence of paragraph (e) be amended to read: *"The permittee shall record all instances when, in accordance with requirements in Section D of this permit, response steps are taken."*

### Response 13:

Change 6 shown in earlier pages, clarifies the notification requirement to apply only if it will be 10 days or more for shutdown of emission unit or control device for additional response steps.

An important goal of the Part 70 Operating Permit program is to assure that each Permittee has the ability to assure compliance with applicable requirements on a continuous basis.

During the development of the Part 70 permit program, IDEM worked with interested parties, such as the:

Clean Air Act Advisory Council's Permit Committee,  
Indiana Manufacturing Association,  
Indiana Chamber of Commerce, and  
individual Part 70 sources.

A consensus was reached that written plans, outside of the permit document, such as the Compliance Response Plan (CRP), are vital tools that the Permittee can implement to ensure compliance. Plans are also the documents to implement if an emission unit or air pollution control device deviates from its normal operation.

It is correct that 326 IAC 2-7-5 and 326 IAC 2-7-6 do not have or use the exact term "CRP" however, 326 IAC 2-7-6(6) provides the Department the authority to specify provisions in the Part 70 Operating Permit as the Commissioner may require with respect to ensuring compliance with applicable requirements. IDEM has determined that a CRP provision is necessary with respect to compliance assurance.

The requirement to develop and implement the plan does not prescribe any new applicable requirement. The CRP is a compilation or reasonable responses, schedules, work practices and other information developed by the Permittee from the standpoint of good business practices and the prevention of environmental problems. The Permittee has to implement these reasonable responses and schedules to maintain or return to compliance. The steps documented in the plan are reasonable actions to be taken for specific deviations that occur at the emission unit or control device.

Permittees already have maintenance schedules and trouble shooting guidelines that specify options and steps to be taken when the emission unit or control device is not operating or functioning properly. The Permittee has the knowledge, expertise and experience on how to operate the equipment at the plant, and is required to develop the CRP based on this knowledge, experience and expertise. The CRP maintains the documentation, such that changes in personnel will not hinder the proper operation of the emission unit and control device. The CRP provides the plant's employees a quick reference on how to respond when an emission unit or air

pollution control device deviates from its normal operation, thus avoiding long periods of deviations.

Pursuant to IC 13-15-5-3, the permit becomes effective upon issuance; therefore the effective date of the permit and the issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness".

The notification requirement in (b)(3) only applies to situations where the emissions unit will continue to operate for an extended period of time while the compliance monitoring parameter is out of range. It is intended to provide IDEM an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with any applicable requirements.

**Comment 14:**

**Conditions D.1.1, D.4.1 and D.5.1, PSD BACT Limitations.** Each of the sections under these conditions includes the design flow rate for the control devices. These design flow rates should be included with the equipment descriptions rather than as part of the limitations themselves.

**Response 14:**

The design flowrates included in these conditions are incorporated as originally stated, pursuant to CP 141-2750 issued October 28, 1996. These are specified only as "design flow rate" as opposed to the "actual flow rates" that will determine the emission limit and compliance with the pound per hour limits also specified in this permit. Therefore, there are no changes as a result of this comment.

See also Response 16.

**Comment 15:**

**Conditions D.1.1 and D.1.6, Particulate Emission Limitations.** These conditions are redundant and would establish two separate violations for the same event (i.e. for not operating a control device). We request that condition D.1.6 be eliminated.

**Response 15:**

Condition D.1.1 is the applicable Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limitations for PM. Condition D.1.6 is a requirement to operate the control device at all times the operation is running. A failure to operate the control device would be a violation of D.1.6, but it may or may not constitute a violation of the PM limits. Depending upon the flow rate, production rate, etc., the compliance with the applicable limit would have to be determined. No change has been made as a result of this comment.

**Comment 16:**

**Conditions D.1.2, D.4.2, and D.5.2, Particulate Matter:** Each of these conditions limits PM emissions to 0.03 gr/dscf consistent with 326 IAC 6-1. This grain loading limit along with the control system flow rates provide emission limits in pounds per hour for each of these processes which are considerably less stringent than the specific limits established as part of the original PSD permits. As such these limits are duplicative and unnecessary, and could conceivably create the possibility of two emission violations for the same event. For all of these reasons, we request that the 0.03 gr/dscf limit be eliminated.

**Response 16:**

Under Part 70 Operating permit program, all applicable regulations must be included in the Part 70 Operating Permit.

The PM conditions found in CP 141-2750 issued October 28, 1996 specified only the “design flow rate” as opposed to the actual flow rates that will determine the PM emission rate and compliance with the pound per hour limits and ton per year limits of this permit. These conditions were established as PSD BACT, pursuant to 326 IAC 2-2. The limits are also more stringent than 326 IAC 6-1.

326 IAC 6-1 also applies to the source and therefore must be listed as an applicable requirement. 326 IAC 6-1 may not have been included in the original construction permit, but has always been applicable to this facility. Neither 326 IAC 6-1 nor the permit establishes pound per hour limits under this rule.

No changes have been made as a result of this comment.

**Comment 17:**

**Conditions D.1.4, D.2.5, D.3.4, D.4.3, D.5.3 and D.6.5, Opacity.** These conditions are all identical and establish a plant wide opacity limit of 5%. We request that a single condition be established under Section C of the permit and that these individual limits in the D section be eliminated. As currently written a single exceedance of the 5% opacity limit could be considered as six separate violations of the various D sections of the permit, even though it is based on a single event.

**Response 17:**

Conditions D.1.4, D.2.5, D.3.4, D.4.3, D.5.3 and D.6.5, have been deleted and the D sections renumbered to appropriately reflect the change. A new condition C.2 has been established and the C section appropriately renumbered to reflect the change.

~~D.1.4 Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

~~D.2.5 Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

~~D.3.4 Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

~~D.4.3 Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

~~D.5.3 Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

**D.6.5** ~~Opacity [326 IAC 2-2]~~

~~Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.~~

**C.2** **Opacity [326 IAC 2-2]**

**Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accordance with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.**

**Comment 18:**

**Conditions D.1.5, D.2.7, D.3.7, D.4.5 and D.5.5, Preventive Maintenance Plan:** We would request that this condition be amended to read as follows: *"A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit is required for the control devices used for these emission units."* We believe that this language is more appropriate as it does not suggest that a preventive maintenance plan is required for the individual emission units themselves.

**Response 18:**

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

- (1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
- (2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
- (3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. If No. 2 fuel oil-fired boilers are not maintained, smoking and increased PM emissions will eventually result. Electrostatic application equipment needs proper maintenance in order to maintain maximum transfer efficiency. There have been no changes as a result of this comment.

**Comment 19:**

**Condition D.1.7 (now D.1.5), Visible Emissions Notations.** This condition requires that we perform visible emissions observations on the Pinch Roll Leveler (EU1), Flash Butt welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) stacks once per shift. These are very small sources, and we do not believe that the use of our compliance resources in this manner is cost effective. Our experience is that there are never visible emissions from these units, and even the amount of material collected by these baghouses is very small. We also believe that the daily visual observations are duplicative of the requirement to monitor pressure drops for these small

baghouses. We request that this condition be eliminated from the permit.

**Response 19:**

IDEM concurs. Condition D.1.5 has been removed and all subsequent conditions renumbered.

**D.1.5 Visible Emissions Notations**

- ~~(a) Visible emission notations of the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
- ~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~
- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

**Comment 20:**

**Conditions D.1.8 (now D.1.5), D.1.15(b)(now D.1.9(a)), D.4.7 (now D.4.5), D.4.11(a)(now D.4.9(a)), D.5.7 (now D.5.5), Scrubber Parametric Monitoring.** These conditions also refer to the monitoring of the “makeup water flow rate”. We believe that the appropriate parameter would be the “water flow rate” as it is the total flow rate that would relate to the effectiveness of the scrubber, and not the “makeup water flow rate”. We have reviewed the operational ranges proposed in the permit and do not believe they properly reflect the actual operating ranges for these control systems. We request that the following ranges be used in the permit rather than those proposed.

Emission Unit	Pressure Drop Range, inches H <sub>2</sub> O	Water Flow Rate, gallons/minute
EU4 Descale Acid Pickling Line	0.5 to 4.0	235 to 470
EU6 Electrolytic Cleaning Tanks	0.5 to 4.0	24 to 48
EU9 Post Treatment Pickling	0.5 to 4.0	80 to 159
EU20 CGL Electrolytic Cleaning	0.5 to 4.0	42 to 84
EU31 CGL Skin Pass Mill	0.5 to 4.0	23 to 46
EU32 CGL Sink Roll Pickling	0.5 to 4.0	25 to 50
EU24 Surface Activation and Plating	0.5 to 4.0	65 to 135

**Response 20:**

The main purpose of the scrubbers at this source is to control fumes. Monitoring pressure drop may not be indicative of performance for these scrubbers. Therefore, IDEM has made the following changes:

**D.1.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

- ~~(a) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Descaling System’s Pickling Tanks (EU4) at least once per~~

shift when the Descaling System's Pickling Tanks (EU4) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 235 to 470 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning Tanks (EU6) at least once per shift when the Electrolytic Cleaning Tanks (EU6) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 12-24 **24-48** gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the Post-Treatment Pickling Tanks (EU9) at least once per shift when the Post-Treatment Pickling Tanks (EU9) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 80-159 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

#### D.4.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning process (EU20) at least once per shift when the Electrolytic Cleaning process (EU20) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 0.5-2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 13 to 26 **42 to 84** gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation,

Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the CGL skin pass mill (EU31) at least once per shift when the CGL skin pass mill (EU31) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 9.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the ~~makeup~~ water flow rate of the scrubber is outside the normal range of ~~67 to 434~~ **23 to 46** gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (c) The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the CGL sink roll pickling operation (EU32) at least once per shift when the CGL sink roll pickling operation (EU32) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 4.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the ~~makeup~~ water flow rate of the scrubber is outside the normal range of ~~100 to 200~~ **25 to 50** gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

**The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be verified for accuracy at least once every six (6) months.**

**D.5.5 Scrubber Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

The Permittee shall record the ~~pressure drop and makeup~~ water flow rate of the scrubber used in conjunction with the Surface Activation and Plating (EU24) at least once per shift when the Surface Activation and Plating (EU24) is in operation and when venting to the atmosphere. ~~When for any one reading, the pressure drop across the scrubber is outside the normal range of 9.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports.~~ When for any one reading, the ~~makeup~~ water flow rate of the scrubber is outside the normal range of ~~48 to 96~~ **65 to 135** gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

**The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be verified for accuracy at least once every six (6) months.**

Also as a result of these changes the following changes have been made to the permit:

**D.1.9 Record Keeping Requirements**

- (a) In order to document compliance with condition D.1.5, the Permittee shall maintain the once per shift records of the ~~pressure drop and make-up~~ water flow of the scrubbers during normal operation when venting to the atmosphere.

#### D.4.10 Record Keeping Requirements

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- (a) In order to document compliance with condition D.4.5, the Permittee shall maintain the once per shift records of the ~~pressure drop and make-up~~ water flow of the scrubbers during normal operation when venting to the atmosphere.

#### D.5.9 Record Keeping Requirements

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- (a) In order to document compliance with condition D.5.5, the Permittee shall maintain the once per shift records of the ~~pressure drop and make-up~~ water flow of the scrubbers during normal operation when venting to the atmosphere.

#### Comment 21:

**Condition D.1.9 (now D.1.7), Baghouse Parametric Monitoring.** We have reviewed the operational ranges for pressure drop proposed in the permit and do not believe they properly reflect the actual operating ranges for the baghouse units. We request that the following ranges be used in the permit rather than those proposed.

Emission Unit	Pressure Drop Range, inches H <sub>2</sub> O
EU1 Pinch Roll Leveler	1.0 to 7.0
EU2 Flash Butt Welder	1.0 to 10.0
EU3 Tension Leveler	1.0 to 10.0
EU11 Roll Shot Blast Cabinet	1.0 to 6.0

#### Response 21:

The company has discussed with IDEM about removing the compliance monitoring requirements for the baghouse units because they are very small units and have minimal PM emissions. Following discussion and review with OAQ personnel, IDEM has decided to remove the compliance monitoring for the baghouses. The following changes have been made to conditions D.1.7, D.1.10, D.1.11 and D.1.13 (subsequent conditions have been renumbered):

#### ~~D.1.7 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]~~

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- ~~(a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Pinch Roll Leveler (EU1) and Flash Butt Welder (EU2), at least once per shift when the Pinch Roll Leveler (EU1) and Flash Butt Welder (EU2), is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(b) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Tension Leveler (EU3), at least once per shift when the Tension Leveler (EU3) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 6.0 and 8.6 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

- ~~(c) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Roll Shot Blast Cabinet (EU11), at least once per shift when the Roll Shot Blast Cabinet (EU11) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~The instrument used for determining the pressure shall comply with Section C – Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.~~

~~D.1.10 Baghouse Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]~~

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~~An inspection shall be performed each calendar quarter of all bags controlling the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

~~D.1.11 Broken or Failed Bag Detection Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]~~

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~~In the event that bag failure has been observed:~~

- ~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B – Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~
- ~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B – Emergency Provisions).~~

~~D.1.9 Record Keeping Requirements~~

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- ~~(a) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) stack exhaust once per shift.~~
- ~~(ba) In order to document compliance with condition D.1.5, the Permittee shall maintain the once per shift records of the water flow of the scrubbers during normal operation when venting to the atmosphere.~~
- ~~(c) To document compliance with Condition D.1.7, the Permittee shall maintain records once~~

~~per shift of the pressure drop of the baghouse during normal operation when venting to the atmosphere.~~

- (eb) In order to document compliance with Condition D.1.6, the Permittee shall maintain records of the results of the scrubber inspections required under Condition D.1.6.
- ~~(e) In order to document compliance with Condition D.1.10, the Permittee shall maintain records of the results of the baghouse inspections required under Condition D.1.10.~~
- (fc) In order to document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the mist eliminator inspections required under Condition D.1.8
- (gd) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 22:**

**Condition D.1.8 and D.1.9, Parametric Monitoring.** We request that the requirement for pressure gauges to be “calibrated” at least once every six (6) months be changed to “verified” at least once every six (6) months. Our QS-9000 and ISO 14001 systems require calibration services to be conducted only by a qualified in-house laboratory or a qualified commercial/independent laboratory. Our instrument service personnel can verify the accuracy of the pressure gauge by comparing to a test gauge.

**Response 22:**

The department concurs with the commentator and agrees to make the change in the language in the conditions D.1.5, D.4.5 and D.5.5 as follows: (See also response 20 for additional changes as a result of this comment)

The instrument used for determining the flow rate shall comply with Section C - Pressure Gauge and other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be ~~calibrated~~ **verified for accuracy** at least once every six (6) months

**Comment 23:**

**Condition D.1.10, D.1.12, D.1.14, D.4.8, D.4.10, D.5.8, and D.5.10 Baghouse, Scrubber and Mist Eliminator Inspections. (now conditions D.1.6, D.1.8, D.4.6, D.4.8, D.5.6 and D.5.8)** The intent of each of these conditions is already covered by other conditions, which may in fact conflict with these conditions. Baghouse and scrubber inspections should more appropriately be included under our Preventive Maintenance Plan, rather than be addressed as a specific permit condition. As a more specific concern, the mist eliminators and scrubbers are part of a common control process, and we do not believe that it is warranted to require that the mist eliminators be inspected more often than the scrubbers themselves. We request that the separate conditions for the mist eliminators be removed and the requirement consolidated with the quarterly inspection requirement for the scrubbers. Our current preventive maintenance schedules for these units is once per quarter and we do not believe that a more frequent inspection schedule is warranted based on our experience with the current maintenance schedule.

**Response 23:**

IDEM concurs that the mist eliminators do not require more frequent inspections than the scrubbers. The majority of the mist eliminators are used in conjunction with the scrubbers. The following changes have been made to Conditions D.1.8, D.4.8 and D.5.8 as a result of this comment:

D.1.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) ~~Monthly~~ **Quarterly** inspections shall be performed on the mist eliminator used in

conjunction with the Tandem Cold Mill (EU5) and descale acid pickling line (EU4), to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**D.4.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) **Monthly Quarterly** inspections shall be performed on the mist eliminator used in conjunction with the Electrolytic Cleaning process (EU20), the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**D.5.8 Mist Eliminator [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]**

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- (a) **Monthly Quarterly** inspections shall be performed on the mist eliminator used in conjunction with the EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Comment 24:**

**Conditions D.1.11, D.1.13, D.4.9 and D.5.9, Broken Bag Failure Detection and Scrubber Failure Detection.** We would request that these conditions be eliminated, since the intent of each of these conditions is already covered by other conditions. The Emergency Provisions in Condition B.11 address situations such as the failure of control equipment. The requirements of these conditions do not appear to be based on a specific applicable requirement. If the failure of a control device, not meeting the requirement for an Emergency were to occur, we understand we have an obligation to report such as a deviation and that the agency has the authority to consider appropriate enforcement action. We believe that these are the appropriate responses and remedies available under existing regulations, but that the inclusion of a specific requirement to shut down our production processes within the context of the Part 70 permit goes beyond the authorities of the Part 70 program. As a practical matter, the shutting down of a process could become a safety issue.

If these conditions remain in the permit we are also concerned with the lack of a clear definition regarding the requirement to "shut down immediately". The processes that we operate cannot be simply switched off. Shutting down a unit often requires a number of actions designed to safeguard the equipment, the operators, and to minimize the impact of the shutdown on other processes. As such we would propose that the language be modified to require that the shut

down of the process in accordance with good engineering and operational practices be carried as soon as practicable.

Both provisions for multi-compartment and single-compartment baghouses must allow operations to continue if the defective bags can be isolated or blanked. Please add to both D.1.13 (now D.1.12) (a) and (b), after the word repaired, "...replaced, blanked, or isolated."

**Response 24:**

326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) provides IDEM the authority to require compliance monitoring conditions as necessary to assure continuous compliance with the emission limits. The baghouses and scrubbers must operate properly in order for these processes to achieve compliance; therefore, IDEM believes it is reasonable and necessary to require the source to shutdown the processes whenever the associated control device fails. The condition states that operations may continue if the event qualifies as an emergency; therefore it does not conflict with condition B.11 (Emergency Provisions).

The department agrees that the 'blanking or isolating' would be an acceptable action for broken or failed bags, because this would not affect the reasonable assurance of compliance. The equipment using baghouse as control can 'blank or isolate' individual bags while maintaining the baghouse operation at the optimum level. However, the baghouse requirements have been removed. See Response 21.

**Comment 25:**

**Conditions D.2.1 and D.3.1, Fuel Type.** We request that the firing rates be eliminated from these conditions. The firing rates are appropriately included in the process descriptions and should not be identified as a specific limit.

**Response 25:**

The design flowrates included in these conditions are incorporated as originally stated, pursuant to CP 141-2750 issued October 28, 1996. These are specified only as "design flow rate" as opposed to the "actual flow rates" that will determine the emission limit and compliance with the pound per hour limits also specified in this permit. Therefore, there are no changes as a result of this comment.

See also Response 16.

**Comment 26:**

**Conditions D.2.4, and D.2.9 Nitrogen Oxides.** These conditions are redundant and would establish two separate violations for the same event (i.e. for not operating a control device). We request that condition D.2.9 be eliminated.

**Response 26:**

Condition D.2.4 is the applicable Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limitations for PM. Condition D.2.9 is a requirement to operate the control device at all times the operation is running. A failure to operate the control device would be a violation of D.2.9, it may or may not constitute a violation of the PM limits. Depending upon the flow rate, production rate, etc., the compliance with the applicable limit would have to be determined. No change has been made.

**Comment 27:**

**Condition D.3.2(b), D.3.3(c) Particulate Matter.** The phrase "heat input" just prior to "package boiler" should be removed from these sentences.

**D.3.3(b), Nitrogen Oxides.** The word “Japanese” should be removed from this sentence.

**Response 27:**

The following changes were made to conditions D.3.2(b), D.3.3(b) and D.3.3(c):

**D.3.2 Particulate Matter (PM) [326 IAC 6-1]**

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- (a) Pursuant to 326 IAC 6-1-2(a), the PM emissions from the CGL heating furnace (EU21) and the CGL galvannealing furnace (EU22) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
- (b) Pursuant to 326 IAC 6-1-2(b), the PM emissions from the ~~heat input~~ package boiler (EU27) shall be limited to 0.01 grains per dry standard cubic foot of exhaust air

**D.3.3 Nitrogen Oxides (NO<sub>x</sub>) [326 IAC 2-2]**

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- (a) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL heating furnace (EU21) shall be controlled by low-NO<sub>x</sub> regenerative burners and limited to 0.2 lbs/MMBtu, 22.62 pounds per hour or 99.08 tpy.
- (b) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL galvannealing furnace (EU22) shall be controlled by low NO<sub>x</sub> ~~Japanese~~ burners and limited to 0.39 pounds per million Btu, 11.78 pounds per hour and 51.58 tons per year.
- (c) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the ~~heat input~~ package boiler (EU27) shall be controlled by flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 3.57 pounds per hour or 15.7 tons per year.

**Comment 28:**

**Conditions D.3.3 and D.3.9,(now 3.8) Nitrogen Oxides.** These conditions are redundant and would establish two separate violations for the same event (i.e. for not operating a control device). We request that condition D.3.9 be eliminated.

**Response 28:**

Condition D.3.3 is the established PSD BACT Limitations for PM. Condition D.3.8 is a requirement to operate the control device at all times the operation is running. A failure to operate the control device would be a violation of D.3.8, it would not necessarily constitute a violation of the PM limits, depending upon the flow rate, production rate, etc., that would have to be determined. No change has been made.

**Comment 29:**

**Condition D.4(r) CGL Sink Roll Pickling.** This description incorrectly indicates this unit processes “Strip”. The same description as found in section A.3(r) of the permit should be used.

**Response 29:**

The D.4 description box has been changed to be the same as condition A.3. See Response 4. This equipment is now listed as (q).

**Comment 30:**

**Conditions D.4.1, and D.4.6 Particulate Matter limits.** These conditions are redundant and would establish two separate violations for the same event (i.e. for not operating a control device).

We request that condition D.4.6 be eliminated.

**Response 30:**

Condition D.4.1 is the established PSD BACT Limitations for PM. Condition D.4.6 (now D. 4.5) is a requirement to operate the control device at all times the operation is running. A failure to operate the control device would be a violation of D.4.6 (now D.4.5), it would not necessarily constitute a violation of the PM limits, depending upon the flow rate, production rate, etc. No change has been made.

**Comment 31:**

**Conditions D.5.1, and D.5.6 Particulate Matter limits.** These conditions are redundant and would establish two separate violations for the same event (i.e. for not operating a control device). We request that condition D.5.6 be eliminated

**Response 31:**

Condition D.5.1 is the established PSD BACT Limitations for PM. Condition D.5.6 (now D.5.5) is a requirement to operate the control device at all times the operation is running. A failure to operate the control device would be a violation of D.5.6 (now D.5.5), it would not necessarily constitute a violation of the PM limits, depending upon the flow rate, production rate, etc. No change has been made.

**Comment 32:**

**D.6.1 Fuel Type**, This condition restricts the operation of our space heaters to the months of October through April. While space heating primarily takes place during these months, we use space heating to manage temperature and more importantly relative humidity in the building for product quality reasons. As such it is necessary for us to operate occasionally during the May through September months during colder weather. We request that this requirement be eliminated from the permit.

**Response 32:**

Upon examination of the original construction permit condition and how it was developed, it was discovered that the 76.3 MMBtu/hr heat input limit was based on 8760 hours. A change was also made to reflect the change made in Response 5 of this addendum. The following changes have been made to condition D.6.1 and D.6.5.

**D.6.1 Fuel Type [326 IAC 2-2]**

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Pursuant to CP 141-2750-00040/00046, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Space Heaters shall burn only natural gas and not exceed a total of 76.3 MMBtu/hr heat input **at the I/N Kote facility only**, and heater operation shall be restricted to the months of October through April.

**~~Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [ 326 IAC 2-6.1-5(a)(2)]~~**

**~~D.6.5 Record Keeping Requirements~~**

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- (a) ~~To document compliance with Conditions D.6.1, the Permittee shall maintain records of natural gas usage by the space heaters at the I/N Kote facility only.~~
- (b) ~~All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

**Comment 33:**

**D.6.2 and D.6.3, Degreasing Operations.** These conditions are redundant, setting up the potential for two violations for the same circumstance and also making it difficult to determine

which conditions actually apply. The Title V permit rules do provide for permit streamlining under the provisions of 326 IAC 2-7-24. We would request that the requirements of this section of the permit be consolidated and streamlined for our small solvent degreasing operations. Condition D.6.3 contains all of the requirements already included in condition D.6.2, and therefore a violation of one of the equipment or operating requirements should not be viewed as separate violations. We would request that condition D.6.2 be removed from the permit. The following brief table is provide to allow for a side by side comparison of the two sets of requirements.

<b>Condition D.6.2 (326 IAC 8-3-2)</b>	<b>Condition D.6.3 (326 IAC 8-3-5)</b>
(a) Equip with a Cover	(a)(1) Equip with a cover (Additional requirements for more volatile solvents.)
(b) Equip with a facility for Draining Parts.	(a)(2) Equip with a facility for Draining Parts. (Additional requirements for more volatile solvents.)
(c) Close the cover when not in use.	(b)(1) Close the Cover when not in use.
(d) Drain Parts for at least 15 seconds.	(b)(2) Drain Parts for at least 15 seconds.
(e) Provide a permanent Label w/ operating requirements.	(a)(3) Provide a permanent Label w/ operating requirements.
(f) Store Waste in covered containers and handle waste in specified manner.	(b)(3) Store Waste in covered containers and handle waste in specified manner.
	(b)(4) Solvent spray must be a solid fluid stream and not cause excessive splashing.
	(b)(5) Control devices are required for more volatile solvents.

**Response 33:**

As outlined in the Technical Support Document, Organic Solvent Degreasing Operations are regulated under 326 IAC 8-3-2 and 326 IAC 8-3-5. The I/N Tek & I/N Kote facilities units were built after January 1, 1980 and performs organic solvent degreasing operations in the state. The emission units were either existing prior to January 1, 1990. Therefore 326 IAC 8-3-5 applies. 326 IAC 8-3-2 and 326 IAC 8-3-5 have limits applicable to the Organic Solvent Degreasing Operations. Since both rules are applicable, both requirements must be outlined in the permit. There has been no change made to the permit.

**Comment 34:**

**Condition D.6.6 (now 6.5), Recordkeeping requirements.** This condition requires that we maintain records of the natural gas usage for our space heaters at the I/N Kote facility. This is not a reasonable requirement given the number and locations of all of our space heating equipment. We would have to separately meter just our space heating. Secondly, there is no specific limit in the permit for usage, and therefore the data would serve no useful purpose. As such we request that this condition be eliminated from the permit.

**Response 34:**

Condition D.6.6 (a) (now 6.5) specifies that this requirement is to document compliance with condition D.6.1. Condition D.6.1 contains a fuel limit for the space heaters at the I/N Kote facility included in the original permit (CP 141-2750-00040/00046). Condition D.6.6(a) (now 6.5) has been changed to specify which units are included in the condition.

**D.6.5 Record Keeping Requirements**

- 
- (a) To document compliance with Conditions D.6.1, the Permittee shall maintain records of natural gas usage by the space heaters **at the I/N Kote facility only.**

**Comment 35:**

**Condition D.7.3 Preventive Maintenance Plan.** We are unaware of any preventive

maintenance measure that we would undertake to ensure compliance with the fuel use limits in this section of the permit. As such we request that this condition be deleted from the permit.

**Response 35:**

IDEM OAQ agrees that a Preventive Maintenance Plan is not necessary for the locomotives. The locomotives are regulated by 40 CFR Part 92, Control of Air Pollution from Locomotives and Locomotive Engines to be maintained. Condition D.7.3 has been removed.

~~D.7.3 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 these facilities.~~

**Comment 36:**

**Condition D.7.2, Switching Locomotives.** This condition references requirements of . This regulation is a mobile source control regulation, and as such it is not appropriate to include in the Part 70 air operating permit. We request that this condition be deleted.

**Response 36:**

Although applicable, IDEM OAQ agrees that 40 CFR Part 92, Control of Air Pollution from Locomotives and Locomotive Engines does not belong in the Part 70 Permit. Condition D.7.2 has been removed. The remaining conditions have been renumbered.

~~D.7.2 Switching Locomotives [40 CFR Part 92]~~

~~The switching locomotives are subject to 40 CFR Part 92 (Control of Air Pollution from locomotives and locomotive engines).~~

**Comment 37:**

**Technical Support Document page 7.** The table on the top of page 7 of the Technical Support Document (TSD) shows the potential to Emit for HCL as greater than 10 tons/year. This is an error since the existing limitations in the permit restrict emissions to less than 10 tons/year by requiring the operation of the scrubber on the Descale Acid Pickling line (EU4) along with the PM emission limit of 0.8 lbs/hour.

**Response 37:**

The Potential to Emit table reflects emission before controls and limits. The Potential to Emit for HCl is greater than 10 tons per year. However, in order for 40 CFR Part 63, Subpart CCC not to apply, source wide HCl emissions are limited to less than 10 tons per year, which requires the operation of the scrubber on the Descale Acid Pickling line (EU4). No change is required.

**Issued June 28, 2004**  
**Indiana Department of Environmental Management**  
**Office of Air Quality**

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

**Source Background and Description**

**Source Name:** I/N Tek & I/N Kote  
**Source Location:** 30755 Edison Road, New Carlisle, Indiana 46552-9695  
**County:** St. Joseph  
**SIC Code:** 3316 & 3471  
**Operation Permit No.:** T141-7316-00159  
**Permit Reviewer:** Teresa Freeman

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from I/N Tek & I/N Kote relating to the operation of a stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil manufacturing source.

**Source Definition**

This stationary continuous cold mill, a continuous hot dip galvanizing line and an electrolytic galvanizing line at a metal coil manufacturing source consists of two (2) plants:

- (a) I/N Tek (141-00040) is located at 30755 Edison Road, New Carlisle, Indiana; and
- (b) I/N Kote (141-00046) is located at 30755 Edison Road, New Carlisle, Indiana.

Since the two (2) plants are located in contiguous properties, I/N Tek supports I/N Kote and are owned by one (1) company, they will be considered one (1) source and assigned plant identification number 141-00159.

**Permitted Emission Units and Pollution Control Equipment**

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

**I/N Tek (continuous cold mill (CCM) for the production of 1.55 million tons per year on an annual basis of cold-rolled steel strips in the coil form) (gear modification October 10, 2000 to allow for higher line speed to produce lighter and narrower products for (EU1-EU5)**

- (a) One (1) pinch roll leveler (EU1), equipped with a baghouse for particulate matter control, exhausted through stack 1, installed on October 15, 1987, capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (b) One (1) flash butt welder (EU2), equipped with a in-line separator and a baghouse for particulate matter control, exhausted through stack 2, installed on October 15, 1987, capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (c) One (1) tension leveler (EU3), equipped with a baghouse for particulate matter control,

- exhausted through stack 3, installed on October 15, 1987, capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
- (d) One (1) descale acid pickling line (EU4), equipped with a counter-current packed tower scrubber and mist eliminator, exhausted through stack 4, installed on October 15, 1987, capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
  - (e) One (1) tandem cold mill (EU5), equipped with a baffle plate collision mist eliminator, exhausted through stack 5, installed on October 15, 1987, capacity: 881,840 pounds per hour of hot rolled steel strip in coil form.
  - (f) One (1) electrolytic cleaning operation (EU6), equipped with a scrubber, exhausted through stack 6, installed on October 15, 1987, capacity: 540,000 pounds per hour of cold rolled steel strip in coil form.
  - (g) One (1) post treatment pickling operation (EU9), equipped with a counter-current packed tower scrubber with a mesh-type mist eliminator, exhausted through stack 9, installed on October 15, 1987, capacity: 540,000 pounds per hour of cold rolled strip steel.
  - (h) One (1) roll shot cabinet (EU11), equipped with a baghouse for particulate matter control, exhausted through stack 11, installed on October 15, 1987, capacity: 20,000 pounds per hour of steel rolls.
  - (i) One (1) natural gas-fired annealing furnace (EU7-1), rated at 222 million British thermal units per hour, controlled by a Bloom 2320 burner or equivalent, exhausted through stack 7, installed on November 3, 1988.
  - (j) One (1) natural gas-fired waste heat boiler (EU7-2), rated at 95.0 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.
  - (k) One (1) natural gas-fired package boiler (EU7-3), rated at 70.8 million British thermal units per hour, controlled by a NO<sub>x</sub> suppression-design and flue gas recirculation, exhausted through stack 7, installed on November 3, 1988.

**I/N Kote (continuous hot dip galvanizing line (CGL) to zinc coat 500,000 tons per year)**

- (l) One (1) CGL natural gas-fired, low NO<sub>x</sub> heating furnace (EU21), rated at 113.1 million British thermal units per hour, controlled by low-NO<sub>x</sub> regenerative burners, exhausted through stack 21, installed on November 15, 1991.
- (m) One (1) CGL natural gas-fired, galvannealing furnace (EU22), rated at 30.2 million British thermal units per hour, controlled by low NO<sub>x</sub> burners, exhausted through stack 22, installed on November 15, 1991.
- (n) One (1) natural gas-fired package boiler (EU27), exhausted through stack 27, rated at 71.5 million British thermal units per hour, controlled by flue gas recirculation, installed on November 15, 1991.
- (o) One (1) CGL electrolytic cleaning operation (EU20), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 20, installed on November 15, 1991, capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (p) One (1) CGL AS-E treatment operation (EU23), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 23, installed on November 15, 1991, capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.
- (q) One CGL skin pass mill (EU31), equipped with a scrubber and a horizontal mist

eliminator, exhausted through stack 31, installed on November 15, 1991, capacity: 123,800 pounds per hour of uncoated cold rolled steel strip.

- (r) One (1) CGL sink roll pickling operation (EU32), equipped with a scrubber with vertical mist eliminator, exhausted through stack 32, installed on November 15, 1991, capacity: fume exhaust 10,000 standard cubic feet per minute.

#### **I/N Kote (electrolytic galvanizing line (EGL) to electroplate 500,000 tons per year)**

- (s) One (1) EGL surface activation and plating operation (EU24), equipped with a scrubber with horizontal mist eliminator, exhausted through stack 24, installed on November 15, 1991, capacity: 135,900 pounds of uncoated cold rolled steel strip.
- (t) One (1) EGL degreasing operation (EU25), equipped with a mist eliminator, exhausted through stack 25, installed on November 15, 1991, capacity 135,900 pounds per hour of uncoated cold rolled steel strip.
- (u) One (1) EGL pre-cleaning operation (EU26), equipped with a mist eliminator, exhausted through stack 26, installed on November 15, 1991, capacity: 135,900 pounds per hour of uncoated cold rolled steel strip.

#### **Internal combustion engines**

- (v) Two (2) 1000 horsepower switching locomotives, each with a maximum capacity of 26.97 gal/hr of diesel fuel

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **Insignificant Activities**

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour (space heaters with a total capacity: 76.3 million British thermal units per hour).
- (b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (c) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers: storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons; vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (e) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (f) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.



(7) TCM oil room ventilation

**Existing Approvals**

The source has been operating under the following approvals:

- (a) CP 141-2750-00040/00046, issued on October 28, 1996 that superceded:
  - (1) PSD 71-1664 for the I/N Tek CCM issued October 1, 1987,
  - (2) PC 71-1715 for the I/N Tek steam generating equipment modifications issued November 3, 1988, and
  - (3) CP 71-1822 for the I/N Kote CGL and EGL issued November 15, 1991.
- (b) Minor source modification 141-12209 issued on August 10, 2000

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (a) CP 141-2750-00040/00046, issued on October 28, 1996.

General Operation Condition 31: Particulate matter from the chrome plating shall be collected by shot hoods and exhausted through a packed tower scrubber and limited to 0.4 pounds per hour and 1.75 tons per year.

General Operation Condition 32: The chrome plating PM emission limits specified in Operation Condition 31 shall be superceded by the requirements of 40 CFR 63, Subpart N no later than January 25, 1997.

Reason excluded: The applicant informed IDEM on February 10, 1997 that the chrome plating with its packed tower scrubber & Chevron or mesh-type mist eliminator had been discontinued at I/N Tek. Therefore, neither of these conditions are included in the proposed Part 70 Permit.

- (b) CP 141-2750-00040/00046, issued on October 28, 1996.

General Operation Condition 17: That the diesel locomotive shall be limited to a maximum throttle load of fifty percent (50%) for more than sixteen (16) hours per day and a seventy five percent (75%) throttle load for no more than eight (8) hours per day.

Reason excluded: Although the permittee requested the removal of this condition, the request stems from the fact that mobile sources are not required to meet emission limitations under the Prevention of Significant Deterioration (PSD) regulations, and their concern over the permitting requirements which may be assumed to apply to future modifications related to locomotive activities. The original application included the impact of these emissions as required.

The locomotives are captive to the source property and furthermore the PSD condition is required to avoid exceedance of the National Ambient Air Quality Standard (NAAQS) increment for NO<sub>x</sub> and PM. Pursuant to the USEPA, the locomotives at I/N Tek and I/N Kote are not considered a mobile source. The switching locomotives are captive to the source property and are present year around. In accordance, they are considered nonroad engines and shall be permitted as such. Condition 17 of CP 2750, has been replaced with limits based on the locomotive standard emission factors for switching locomotives and limited by fuel usage in Section D.7 of the permit. The original conditions were equivalent to 133.6 tpy of NO<sub>x</sub> and 3.7 tpy of PM. The new limits are 121.03 tpy of

NO<sub>x</sub>, 12.72 tpy of CO and 3.06 tpy of PM/PM<sub>10</sub>. This change satisfies the protection of the NAAQS.

- (c) CP 141-2750-00040/00046, issued on October 28, 1996.

Condition 29-That the electrostatic oiler shall be enclosed and maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 3,032 scfm exhausting through a fume scrubbing system with a HEAF filter and mesh type mist eliminator. Particulate matter emissions shall not exceed 0.1 pounds per hour and 0.44 tons per year.

Reason excluded: The electrostatic oiler EU10 was removed from the facility in July 1999 and condition is no longer applicable.

### Enforcement Issue

There are no enforcement actions pending.

### 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 December 2, 1996. Additional information was received on December 15, 1997, January 28, November 24, 1998 and May 8, 2001.

A notice of completeness letter was mailed to the source on January 3, 1997.

### Emission Calculations

See page 1- Appendix A of this document for emissions calculations for the switching locomotives.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/year)
PM	greater than 250
PM <sub>10</sub>	greater than 250
SO <sub>2</sub>	less than 100

VOC	less than 100
CO	greater than 100, less than 250
NO <sub>x</sub>	greater than 250

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

HAPs	Potential to Emit (tons/year)
HCL	greater than 10
Nickel	less than 10
TOTAL	less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM<sub>10</sub>, CO and NO<sub>x</sub> 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 to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) 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 one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from the source. This information reflects 2001 OAQ emission data and the applicant supplied 2000 HAPs emissions.

Pollutant	Actual Emissions (tons/year)
PM	23.0
PM <sub>10</sub>	23.0
SO <sub>2</sub>	1.0
VOC	9.0
CO	39.0
NO <sub>x</sub>	133.0
HCl	4.06
Nickel	0.26
Formaldehyde	0.23
Hexane	5.47

### County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>x</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) St. Joseph County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, Ozone, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

### Part 70 Permit Conditions

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

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

### Federal Rule Applicability

- (a) The I/N Kote 71.5 million British thermal units per hour natural gas-fired package boiler (EU27) is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because it was constructed after June 9, 1989 and has a heat input capacity greater than 10 million Btu per hour and less than 100 million Btu per hour. Pursuant to this rule, records shall be kept of the amount of fuel combusted each day. All records shall be maintained for a period of two years following the date of such record. There are no other requirements pursuant to this rule because the boiler combusts only natural gas.
- (b) The natural gas-fired package boiler (EU7-3) and the natural gas-fired waste heat boiler (EU7-2) installed during November 1988 are not subject to the requirements of the New

Source Performance Standard, 326 IAC 12, (40 CFR 60.40b, Subpart Db) because their individual capacities are each less than one hundred (100) million British thermal units per hour. These two (2) boilers are also not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc), because they were both installed during November 1988 which is prior to the June 9, 1989 applicability date.

- (c) The degreasing facilities at this source are not subject to NESHAP Subpart T (40 CFR 63.460-469) since halogenated HAP solvents are not used as indicated in the application.
- (d) This pickling operation at I/N Tek (EU4 and EU9) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPS), 40 CFR Part 63, Subpart CCC-Steel Pickling Facilities because they are not a major source of HAPs in accordance with this rule. After control HAPs emissions are less than 10 tpy for a single HAP and less than 25 tpy for total HAPs.
- (e) The pickling operation (EU23 and EU32) at I/N Kote are not subject to the National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, Subpart CCC because sulfuric acid is used, not HCl.
- (f) This source is not subject to the New Source Performance Standard 40 CFR Part 60, Subpart TT (Metal Coil Coating) because the coatings are inorganic, not organic coatings as defined in 40 CFR 60.461.
- (g) The switching locomotives are subject to 40 CFR Part 92 (Control of Air Pollution from locomotives and locomotive engines).

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source is a major source that was reviewed under PSD 71-1664 for I/N Tek CCM issued October 1, 1987 superceded by CP141-2750-00040/00046 issued October 28, 1996.

##### **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 ten (10) tons per year for St. Joseph County of NO<sub>x</sub>. 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 April 15 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 (Opacity)**

This source is subject 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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### **State Rule Applicability - Individual Facilities**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

- (a) Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Kote emissions of lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, hydrogen sulfide, total

reduced sulfur and reduced sulfur compounds shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.

- (b) Pursuant to CP 141-2750-00040, issued on October 26, 1996, the I/N Tek emissions of sulfur dioxide, carbon monoxide, volatile organic compounds, lead, asbestos, beryllium, mercury, vinyl chloride, fluorides, sulfuric acid mist and total reduced sulfur compounds (including hydrogen sulfide) shall not exceed the annual significant emission levels established in 40 CFR 52.21 and 326 IAC 2-2.
- (c) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, visible emissions from any stack, process exhaust, control device or building roof monitor shall not exceed five (5) percent opacity based on twenty-four (24) readings taken in accord with 40 CFR 60, Appendix A, Method 9 and 326 IAC 5-1.
- (d) Pursuant to 40 CFR 52.21, 326 IAC 2-2 and CP 141-2750-00040, issued on October 26, 1996, BACT was determined to be all of the control devices incorporated in the equipment list associated with the I/N Tek and I/N Kote source. In addition, BACT also includes the emission limitations and operating conditions incorporated in Section D of the permit, as listed in (e) through (j).
- (e) Continuous Cold Mill
  - (1) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission rates from the Pinch Roll Leveler (EU1) shall be collected by a hood and exhaust system with a design flow rate of 12,000 scfm exhausting through a baghouse. Particulate matter emissions shall not exceed 0.5 lbs/hr and 2.2 tpy.
  - (2) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the entire welding electrode system for the Flash Butt Welder (EU2) shall be enclosed. Particulate matter emissions shall be collected by a ventilation system operating with a design flow rate of 7,956 scfm exhausting through an in-line separator and a baghouse. Particulate matter emissions shall not exceed 0.1 lbs/hr or 0.44 tpy.
  - (3) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission rates from the Tension Leveler (EU3) shall be collected by a hood and exhaust system with a design flow rate of 22,732 scfm exhausting through a baghouse. Particulate matter emissions shall not exceed 0.8 lbs/hr and 3.5 tpy.
  - (4) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Descaling System's Pickling Tanks (EU4) shall be equipped with water sealed edge covers. Particulate emissions shall be collected under negative pressure by a ventilation system operating with a design flow rate of 35,235 scfm exhausting through a counter-current packed tower scrubber with a mist eliminator installed above the packing. Particulate matter emissions shall not exceed 0.8 lbs/hr and 3.5 tpy.
  - (5) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emission from Tandem Cold Mill (EU5) enclosure shall be collected by a ventilation system operating with a design flow rate of 147,667 scfm exhausting through two Hitachi Baffle Plate Collision Type 1 (or equivalent) mist eliminators. Particulate matter emissions shall not exceed 6.6 lbs/hr and 28.9 tpy.
  - (6) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Electrolytic Cleaning Tanks (EU6) shall be covered and maintained under negative pressure. Particulate emissions shall be

collected by a ventilation system operating with a design flow rate of 15,912 scfm exhausting through a Ceilcote horizontal air wash (or equivalent). Particulate matter emissions shall not exceed 0.28 lb/hr and 1.2 tpy.

- (7) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Post-Treatment Pickling Tanks (EU9) shall be covered and maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 9,472 scfm exhausting through a counter-current packed tower scrubber with a Chevron or mesh type mist eliminator installed above the packing. Particulate matter emissions shall not exceed 0.2 lbs/hr and 0.88 tpy.
- (8) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Roll Shot Blast Cabinet (EU11) shall be maintained under negative pressure. Particulate emissions shall be collected by a ventilation system operating with a design flow rate of 4,164 scfm exhausting through a baghouse. Particulate matter emissions shall not exceed 0.35 lb/hr and 1.5 tpy.

(f) I/N Tek combustion

- (1) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the annealing furnace (EU7-1) and shall not exceed 222 MMBtu/hr input.
- (2) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the waste heat boiler (EU7-2) and shall not exceed 95 MMBtu/hr input.
- (3) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, shall burn only natural gas in the package boiler (EU7-3) and shall not exceed 70.8 MMBtu/hr heat input.
- (4) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the annealing furnace (EU7-1) shall not exceed 0.003 pounds per million Btu, 0.66 pounds per hour and 2.77 tons per year.
- (5) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the waste heat boiler (EU7-2) shall not exceed 0.003 pounds per million Btu, 0.285 pounds per hour and 1.25 tons per year.
- (6) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM emissions from the package boiler (EU7-3) shall not exceed to 0.003 pounds per million Btu, 0.21 pounds per hour and 0.93 tons per year.
- (7) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the annealing furnace (EU7-1) shall be controlled by Bloom 2320 Burner (or equivalent) and shall not exceed 0.43 pounds per million Btu, 95.5 pounds per hour or 418.1 tons per year.
- (8) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the waste heat boiler (EU7-2) shall be controlled by NO<sub>x</sub> suppression-design and flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 4.75 pounds per hour or 20.8 tons per year.

- (9) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the package boiler (EU7-3) shall be controlled by NO<sub>x</sub> suppression-design and flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 3.54 pounds per hour or 15.5 tons per year.
- (g) I/N Kote combustion
- (1) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the CGL heat furnace (EU21) and limited to 113.1 MMBtu/hr input.
  - (2) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, only natural gas shall be burned in the CGL galvannealing furnace (EU22) and limited 30.2 MMBtu/hr input.
  - (3) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, shall burn only natural gas in the package boiler (EU27) and shall not exceed 71.5 MMBtu/hr input.
  - (4) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL heating furnace (EU21) shall be controlled by low-NO<sub>x</sub> regenerative burners and limited to 0.2 lbs/MMBtu, 22.62 pounds per hour or 99.08 tpy.
  - (5) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the CGL galvannealing furnace (EU22) shall be controlled by low NO<sub>x</sub> Japanese burners and limited to 0.39 pounds per million Btu, 11.78 pounds per hour and 51.58 tons per year.
  - (6) Pursuant to CP 141-2750-00040/00046, issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the NO<sub>x</sub> emissions from the heat input package boiler (EU27) shall be controlled by flue gas recirculation and shall not exceed 0.05 pounds per million Btu, 3.57 pounds per hour or 15.7 tons per year.
- (h) Continuous hot dip galvanizing line (CGL)
- (1) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Electrolytic Cleaning process (EU20), the PM and PM<sub>10</sub> emissions shall be controlled by a ventilation system with a design flow rate of 24,630 standard cubic feet per minute, vented to a horizontal mist eliminator and scrubber. Particulate matter emissions shall not exceed 0.60 lbs/hr and 2.63 tpy.
  - (2) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the particulate matter from the CGL AS-E Treatment Operation (EU23) controlled by a ventilation system with a design flow rate of 15,160 standard cubic feet per minute, exhausted through a horizontal mist eliminator and scrubber. Particulate emissions shall not exceed 0.27 lb/hr and 1.18 tpy.
  - (3) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> emissions from the CGL skin pass mill (EU31) shall be controlled by a ventilation system with design flow rate of 11,313 standard cubic feet per minute, exhausted to a fume scrubber. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.

- (4) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM and PM<sub>10</sub> and sulfuric acid mist emissions from the CGL sink roll pickling operation (EU32) shall be controlled by a ventilation system with a design flow rate of 10,000 standard cubic feet per minute, exhausting to a high efficiency scrubber and vertical mist eliminator. Particulate matter emissions shall not exceed 0.25 lbs/hr and 1.10 tpy.
- (i) I/N Kote electrolytic galvanizing line
- (1) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM<sub>10</sub>/PM and sulfuric acid mist emissions for the Surface Activation and Plating (EU24) shall be controlled by a ventilation system with a design flow rate of 41,480 scfm vented to a horizontal mist eliminator and scrubber. Particulate matter emissions shall not exceed 2.09 pounds per hour and 9.15 tons per year.
  - (2) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the particulate matter limit for the EGL Degreasing Section (EU25) shall be controlled by a ventilation system with a design flow rate of 3,117 scfm venting to a mist eliminator. Particulate matter emissions shall not exceed 0.10 pounds per hour and 0.44 tons per year.
  - (3) Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the PM<sub>10</sub>/PM and alkaline solution mist generated from the EGL Pre-cleaning Section (EU26) shall be controlled by a ventilation system with a design flow rate of 2,981 scfm vented to a mist eliminator. Particulate matter emissions shall not exceed 0.10 pounds per hour and 0.44 tons per year.
- (j) Insignificant Activities
- Pursuant to CP 141-2750-00040/00046 issued October 28, 1996, 326 IAC 2-2(PSD) and 40 CFR 52.21, the Space Heaters shall burn only natural gas and not exceed a total of 76.3 MMBtu/hr heat input, and heater operation shall be restricted to the months of October through April.
- (k) Internal Combustion Engines
- (1) The total input of diesel fuel to the two (2) 1000 hp diesel fired switching locomotives (internal combustion engines) shall be less than 304,000 total gallons per 12 consecutive month period rolled monthly. This usage limit is required to limit the potential to emit of nitrogen oxides (NO<sub>x</sub>) to 121.03 tons per year, carbon monoxide (CO) to 12.72 tons per year and PM/PM<sub>10</sub> to less than 3.06 tons per year, each.

### 326 IAC 6-1 (Nonattainment area limitations)

This source is located in St. Joseph County, which is listed in 326 IAC 6-1-7, but the source is not specifically listed in 326 IAC 6-1-18. Since potential PM emissions from the entire source is greater than 100 tons per year, the requirements of 326 IAC 6-1-2 are applicable.

- (a) Pursuant to 326 IAC 6-1-2(a):
- (1) the PM emissions from the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3), the Descaling System's Pickling Tanks (EU4), Tandem Cold Mill (EU5), the Electrolytic Cleaning Tanks (EU6), the Post-Treatment Pickling Tanks (EU9) and the Roll Shot Blast Cabinet (EU11) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air

- (2) the PM emissions from the annealing furnace (EU7-1) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
  - (3) the PM emissions from the CGL heating furnace (EU21) and the CGL galvannealing furnace (EU22) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
  - (4) the PM emissions from the Electrolytic Cleaning process (EU20), the CGL AS-E Treatment Operation (EU23), the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
  - (5) the PM emissions from Surface Activation and Plating (EU24), EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) shall be limited to 0.03 grains per dry standard cubic foot of exhaust air
  - (6) the allowable PM emission rate from the brazing equipment, cutting torches, soldering and welding equipment, lime storage silo, inspection line electrostatic oiler, electric motor ventilation, skinpass oil room ventilation, wrapping line edge oiler, and CGL quench fume shall not exceed allowable PM emission rate of 0.03 grains per dry standard cubic foot of exhaust air
- (b) Pursuant to 326 IAC 6-1-2(b):
- (1) the PM emissions from the waste heat boiler (EU7-2) and the package boiler (EU7-3) shall be limited to 0.01 grains per dry standard cubic foot of exhaust air
  - (2) the PM emissions from the heat input package boiler (EU27) shall be limited to 0.01 grains per dry standard cubic foot of exhaust air

#### 326 IAC 6-4 (Fugitive Dust Emissions)

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan detailed in CP 141-2750-00040/00046, issued October 28, 1996, which consists of:

- (a) That all roads and parking areas shall be paved. Fugitive dust emission from the paved roads and parking lots shall be controlled by the daily application of water flushing during the months of April through October to reduce uncontrolled emissions by at least 90 percent and down to 28.7 pounds of silt per mile.
- (b) Since the Industrial Augmentation factor of  $I = 1$  was used for the emissions inventory, vehicles shall be limited to traveling on paved surfaces only and not allowed to enter any paved surface except from public paved roads.
- (c) Upon request of the Assistant Commissioner, I/N Kote shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures given in Reference 1. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to

exceed the controlled silt surface loading of 28.7 pounds per mile.

- (d) I/N Kote shall test and provide to the Indiana Department of Environmental Management, Office of Air Quality, representative silt loading measurements for 3 segments of paved road per month during the months of April through November. IDEM will have the right to specify road segments to be sampled. I/N Kote shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 28.7 pounds of silt per mile.
- (e) Exceptions - Cleaning of paved road segments and parking lots may be delayed by one day when:
  - (1) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning, or
  - (2) the road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access, or
  - (3) it is raining at the time of the scheduled cleaning.

326 IAC 7-1.1 (Sulfur dioxide emission limitations)

The I/N Tek and I/N Kote facilities are not subject to the requirements of this rule because each individual facility does not have a potential to emit sulfur dioxide at rates greater than or equal to twenty-five (25) tons per year or ten (10) pounds per hour.

326 IAC 8 (VOC)

326 IAC 8-1-6 and 326 IAC 8-6 do not apply since the potential VOC emissions from the entire source are under twenty-five (25) tons per year.

326 IAC 8-3-2 (Organic Solvent Degreasing Operations)

The I/N Tek & I/N Kote facilities are subject to the requirements of 326 IAC 8-3-2 (Organic Solvent Degreasing Operations) because the units were built after January 1, 1980 and performs organic solvent degreasing operations in the state. The owner or operator of a cold cleaning facility shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser facilities existing prior to January 1, 1990 shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));

- (B) The solvent is agitated; or
  - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>°</sup>C) (one hundred degrees Fahrenheit (100<sup>°</sup>F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38<sup>°</sup>C) (one hundred degrees Fahrenheit (100<sup>°</sup>F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9<sup>°</sup>C) (one hundred twenty degrees Fahrenheit (120<sup>°</sup>F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### 326 IAC 9 (Carbon Monoxide Emission Limitations)

The plant is subject to 326 IAC 9 (Carbon Monoxide Emission Limitations) because it is a stationary source which emits CO emissions and commenced operation after March 21, 1972. However, there are no specific emission limitations required by this rule because the source is not an operation listed under 326 IAC 9-1-2.

#### 326 IAC 10 (Nitrogen Oxide Emission Limitations)

The plant is not subject to the requirements of 326 IAC 10 (Nitrogen Oxide Emission Limitations) because the plant is not located in Clark County or Floyd County.

### Testing Requirements

The performance testing requirements applicable to this source are as follows:

- (a) Within eighteen (18) months after issuance of this permit, the Permittee shall perform NO<sub>x</sub> testing on the annealing furnace (EU7-1) utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.
- (b) Within eighteen (18) months after issuance of this permit, the Permittee shall perform NO<sub>x</sub> testing on the heating furnace (EU21) utilizing methods approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

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

- (a) The I/N Tek Continuous Cold Mill processes have applicable compliance monitoring conditions as specified below:
  - (1) No Visible emission notations are required for the units with scrubbers because scrubbers only allow the observation of dispersed water particles. However, the scrubbers will have once per shift monitoring of pressure drop and water flow rate and quarterly inspections.
  - (2) Visible emission notations of the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and

characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (3) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Descaling System's Pickling Tanks (EU4) at least once per shift when the Descaling System's Pickling Tanks (EU4) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 235 to 470 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (4) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning Tanks (EU6) at least once per shift when the Electrolytic Cleaning Tanks (EU6) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 12-24 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (5) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Post-Treatment Pickling Tanks (EU9) at least once per shift when the Post-Treatment Pickling Tanks (EU9) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 2.0-4.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 80-159 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (6) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Pinch Roll Leveler (EU1) and Flash Butt Welder (EU2), at least once per shift when the Pinch Roll Leveler (EU1) and Flash Butt Welder (EU2), is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (7) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Tension Leveler (EU3), at least once per shift when the Tension Leveler (EU3) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 6.0 and 8.6 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (8) The Permittee shall record the pressure drop across the baghouse used in conjunction with the Roll Shot Blast Cabinet (EU11), at least once per shift when the Roll Shot Blast Cabinet (EU11) is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (9) An inspection shall be performed each calendar quarter of all scrubbers controlling the Descaling System's Pickling Tanks (EU4), Electrolytic Cleaning Tanks (EU6), and Post-Treatment Pickling Tanks (EU9, when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.
- (10) An inspection shall be performed each calendar quarter of all bags controlling the Pinch Roll Leveler (EU1), Flash Butt Welder (EU2), Tension Leveler (EU3) and Roll Shot Blast Cabinet (EU11) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.
- (11) Monthly inspections shall be performed on the mist eliminator used in conjunction with the Tandem Cold Mill (EU5) and descale acid pickling line (EU4), to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in

accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (b) The I/N Tek and I/N Kote combustion processes have no applicable compliance monitoring conditions. No visible emissions (VE) are required for any of the boilers and furnaces because they only use natural gas.
- (c) The I/N Kote Continuous Hot Dip Galvanizing Line has applicable compliance monitoring conditions as specified below:
  - (1) No Visible emission notations are required for the units with scrubbers because scrubbers only allow the observation of dispersed water particles. However, the scrubbers will have once per shift monitoring of pressure drop and water flow rate and quarterly inspections.
  - (2) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Electrolytic Cleaning process (EU20) at least once per shift when the Electrolytic Cleaning process (EU20) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 0.5-2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 13 to 26 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
  - (3) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL AS-E Treatment Operation (EU23) at least once per shift when the CGL AS-E Treatment Operation (EU23) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 0.5-2.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 7 to 13 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
  - (4) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL skin pass mill (EU31) at least once per shift when the CGL skin pass mill (EU31) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 9.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation,

- Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 67 to 134 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (5) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the CGL sink roll pickling operation (EU32) at least once per shift when the CGL sink roll pickling operation (EU32) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 4.0 to 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 100 to 200 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (6) An inspection shall be performed each calendar quarter of all scrubbers controlling the Electrolytic Cleaning process (EU20), CGL AS-E Treatment Operation (EU23), CGL skin pass mill (EU31) and CGL sink roll pickling operation (EU32), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.
- (7) Monthly inspections shall be performed on the mist eliminator used in conjunction with the Electrolytic Cleaning process (EU20), the CGL AS-E Treatment Operation (EU23), the CGL skin pass mill (EU31) and the CGL sink roll pickling operation (EU32) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.
- (d) The I/N Kote Electrolytic Galvanizing Line has applicable compliance monitoring conditions as specified below:
- (1) No Visible emission notations are required for the units with scrubbers because scrubbers only allow the observation of dispersed water particles. However, the scrubbers will have once per shift monitoring of pressure drop and water flow rate and quarterly inspections.
- (2) The Permittee shall record the pressure drop and makeup water flow rate of the scrubber used in conjunction with the Surface Activation and Plating (EU24) at least once per shift when the Surface Activation and Plating (EU24) is in operation and when venting to the atmosphere. When for any one reading, the pressure drop across the scrubber is outside the normal range of 9.0 to 10.0

inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. When for any one reading, the makeup water flow rate of the scrubber is outside the normal range of 48 to 96 gallons per minute or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

- (3) An inspection shall be performed each calendar quarter of all scrubbers controlling the Surface Activation and Plating (EU24), when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.
- (4) Monthly inspections shall be performed on the mist eliminator used in conjunction with the EGL Degreasing Section (EU25) and EGL Pre-cleaning Section (EU26) to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

## **Conclusion**

The operation of this continuous mill and continuous hot dip galvanizing line metal coil manufacturing source shall be subject to the conditions of the attached proposed Part 70 Permit No. T141-7316-00159.

**Appendix A: Emissions Calculations**  
**Switching Locomotive-nonroad engine emissions**

**Company Name:** I/N Tek & I/N Kote  
**Address City IN Zip:** 30755 Edison Rd, New Carlisle, Indiana 46552  
**Permit No.** T-141-7316-00159  
**Reviewer:** Teresa Freeman  
**Date:** May 15, 2001

	<b>Diesel Fuel Used*</b> gal/hr	<b>Fuel Usage*</b> million gal/yr	<b>Limited Fuel Usage*</b> million gal/yr	<b>Baseline emission rates</b> gram/brake hp-hr (g/bhp-hr)	<b>EF</b> gram/gal (g/gal)	<b>Total Emissions</b> metric tons/year	<b>Total Emissions</b> tons/year
<b>NOx</b>	26	0.228	0.152	17.4	361.92	55.01	121.03
<b>PM/PM10</b>	26	0.228	0.152	0.44	9.152	1.39	3.06
<b>CO</b>	26	0.228	0.152	1.83	38.064	5.78	12.72
<b>Total Hydrocarbons</b>	26	0.228	0.152	1.01	21.008	3.19	7.02

\*per locomotive (2 locomotives currently on I/N Tek & I/N Kote property)

Baseline emission rates from EPA Technical Document EPA420-F-97-051, December 1997

EF(g/gal) = Baseline emission rate(g/bhp-hr) X 20.8 (bhp-hr/gal)

Total emissions (metric tons/year)= EF (g/gal) X fuel consumption in million gal/yr X 1 (metric ton/million gram)

Total emissions ( tons/year)= Total emissions (metric tons/year) X 1.1 (tons/metric tons) X 2 (number of locomotives)

Limited Fuel Usage is equal to 75% throttle for 16 hours and 50% throttle for 8 hours (CP 141-2750-00040/00046 issued 10/28/96)