



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

June 30, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

TO: Interested Parties / Applicant  
RE: USS-Midwest / 127-7403-00009  
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.



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
www.in.gov/idem

## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**US Steel-Midwest Plant  
U.S. Route 12  
Portage, Indiana 46368**

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

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

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

Operation Permit No.: T127-7403-00009

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

Issuance Date: June 30, 2004

Expiration Date: June 30, 2009

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY.....</b>
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]
<b>B</b>	<b>GENERAL CONDITIONS .....</b>
B.1	Definitions [326 IAC 2-7-1]
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]
B.3	Enforceability [326 IAC 2-7-7]
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
B.5	Severability [326 IAC 2-7-5(5)]
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]
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]
B.11	Emergency Provisions [326 IAC 2-7-16]
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5]
B.14	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
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]
B.16	Permit Renewal [326 IAC 2-7-4]
B.17	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]
B.19	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]
B.20	Source Modification Requirement [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]
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
B.24	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]
<b>C</b>	<b>SOURCE OPERATION CONDITIONS.....</b>
	<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
C.2	Opacity [326 IAC 5-1]
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]
C.5	Fugitive Dust Emissions [326 IAC 6-4]
C.6	Operation of Equipment [326 IAC 2-7-6(6)]
C.7	Stack Height [326 IAC 1-7]
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
	<b>Testing Requirements [326 IAC 2-7-6(1)]</b>
C.9	Performance Testing [326 IAC 3-6]

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

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- 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)]

**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]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports  
[326 IAC 2-7-5] [326 IAC 2-7-6]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

**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]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

**Stratospheric Ozone Protection**

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

**D.1 FACILITY OPERATION CONDITIONS - No. 1 Galvanizing Line.....**

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

- D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- D.1.2 Sulfur Dioxide [326 IAC 7-1.1-1]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**D.2 FACILITY OPERATION CONDITIONS - No. 2 Galvanizing Line.....**

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

- D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- D.2.2 Emission Offset and Prevention of Significant Deterioration [326 IAC 2-3][326 IAC 2-2]
- D.2.3 Emission Offset and Prevention of Significant Deterioration [326 IAC 2-3][326 IAC 2-2]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

D.2.5 Testing Requirements [326 IAC 2-7-6(1), (6)]

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

D.2.6 Record Keeping Requirements

**D.3 FACILITY OPERATION CONDITIONS - Continuous Anneal Line.....**

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

- D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- D.3.2 Sulfur Dioxide [326 IAC 7-1.1-1]

**D.4 FACILITY OPERATION CONDITIONS - Batch Anneal Furnaces.....**

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

- D.4.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- D.4.2 Sulfur Dioxide [326 IAC 7-1.1-1]

**D.5 FACILITY OPERATION CONDITIONS - Pickle Line.....**

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

- D.5.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]
- D.5.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR Part 63, Subpart CCC]
- D.5.3 NESHAP Maintenance Requirements [40 CFR Part 63.1160, Subpart CCC]
- D.5.4 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**Compliance Determination Requirements**

- D.5.5 Testing Requirements [40 CFR Part 63.1161]

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

- D.5.6 Monitoring Requirements [40CFR Part 63.1162]

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

- D.5.7 Record Keeping Requirements [40 CFR Part 63.1165]
- D.5.8 Reporting Requirements [40 CFR Part 63.1164]

**D.6 FACILITY OPERATION CONDITIONS - Cold Reduction Mills.....**

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

- D.6.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**D.7 FACILITY OPERATION CONDITIONS - No. 3 Galvanizing Line.....**

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

- D.7.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart SSSS] [40 CFR 63.5140(b)]
- D.7.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil [40 CFR Part 63, Subpart SSSS] [40 CFR 63.5100] [40 CFR 63.5110] [40 CFR 63.5130]
- D.7.3 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- D.7.4 Nitrogen Oxide (NOx)
- D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.7.6 Selective Non-Catalytic NOx Reduction Unit

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

- D.7.7 Continuous Emission Monitoring

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

- D.7.8 Record Keeping Requirements
- D.7.9 Reporting Requirements
- D.7.10 Notification Requirements [40 CFR 63.5180]
- D.7.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

**D.8 FACILITY OPERATION CONDITIONS - Electrolytic Cleaning Line.....**

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

- D.8.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**D.9 FACILITY OPERATION CONDITIONS - Chrome Electroplate Line.....**

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

D.9.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**D.10 FACILITY OPERATION CONDITIONS - Temper Mills.....**

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

D.10.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**D.11 FACILITY OPERATION CONDITIONS - Tin Electroplate Line .....**

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

D.11.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

**D.12 FACILITY OPERATION CONDITIONS - Insignificant Activities.....**

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

D.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

D.12.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

**Compliance Determination Requirements**

D.12.3 Organic Solvent Degreasing Operations [326 IAC 8-3-8]

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

D.12.4 Record Keeping Requirements

**D.13 FACILITY OPERATION CONDITIONS –Oil Tech (insignificant activities).....**

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

D.13.1 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels)

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

D.13.2 Record Keeping Requirements

**Certification.....**

**Emergency Occurrence Report.....**

**Quarterly Deviation and Compliance Monitoring Report.....**

## 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)]

---

The Permittee owns and operates a stationary steel finishing facility.

Responsible Official:	Plant Manager
Source Address:	U.S. Route 12, Portage, Indiana 46368
Mailing Address:	U.S. Route 12, Portage, Indiana 46368
General Source Phone Number:	(219) 763-5869
SIC Code:	3316
County Location:	Porter
Source Location Status:	Nonattainment for 1-hour ozone and 8-hour ozone standard Unclassifiable for PM10 and SO2 Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program (326 IAC 2-7-2) Major Source, under PSD and Emission Offset; (326 IAC 2-2 and 326 IAC 2-3) 1 of 28 Source Categories (326 IAC 2-2)

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

---

US Steel-Midwest Plant consists of a source with on-site contractors:

- (a) US Steel-Midwest Plant, the primary operation, is located at U.S. Highway 12, Portage, Indiana 46368; and
- (b) American Iron Oxide Company (AMROX), the on-site contractor (an acid regeneration facility) is located at U.S. Highway 12, Portage, Indiana 46368.
- (c) Portside Energy, the on-site contractor (a Cogeneration facility), is located at U.S. Highway 12, Portage, Indiana 46368
- (d) Oil Technology, Inc, the on-site contractor (a used oil recycling facility), is located at U.S. Highway 12, Portage, Indiana 46368

IDEM has determined that US Steel-Midwest Plant and American Iron Oxide Company are not under the common control of US Steel-Midwest Plant and have different SIC. US Steel-Midwest Plant provides less than 50% of AMROX's capacity for spent pickle liquor recycling, purchases no iron oxide and receives less than 50% of the regenerated HCl from AMROX. These two plants are considered separate major sources. Therefore, the term "source" in the Part 70 documents refers to US Steel-Midwest Plant. American Iron Oxide Company will obtain their own Part 70 permit (T127-14756-00085).

IDEM has determined that US Steel-Midwest Plant and Portside Energy Company are not under the common control of US Steel-Midwest Plant and have different SIC. These two plants are considered separate major sources. Therefore, the term "source" in the Part 70 documents refers to US Steel-Midwest Plant. Portside Energy will obtain their own Part 70 permit (127-10138-00067).

IDEM has determined that US Steel-Midwest Plant and Oil Technology, Inc. are under the common

control of US Steel-Midwest Plant. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both US Steel-Midwest Plant and Oil Technology, Inc. as one source. One combined Part 70 permit will be issued to US Steel-Midwest Plant and Oil Technology, Inc.

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

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

**(a) No. 1 Galvanizing Line (Also known as 48" Galvanizing Line) (Installed in 1960), with a capacity rate of 28.5 net tons of steel coated per hour and 50.3 MMBtu/hr heat input, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section (I020) with a fume washer and exhausting through stack S008
- (3) Annealing Furnace Section (U005) fired by natural gas and exhausting through stack S023
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Post Anneal Furnace fired with natural gas and exhausting through stack S023a
- (7) Roll Rig fired by natural gas exhausting through roof monitor

**(b) No. 2 Galvanizing Line (Also known as 72" Galvanizing Line) (Installed in 1970 and modified 1997), with a capacity rate of 51.4 net tons per hour of steel, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas and exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section consisting of an electrolytic cleaning tank, a scrubber tank and a hot water rinse tank (U006a) with a fume washer (C006) and exhausting through stack S009
- (3) Annealing Furnace Section (U006b)
  - (A) 149 natural gas burners, each with a rated capacity of 0.375 MMBtu per hour in furnace zones 1-5, exhausting through stack S-20
  - (B) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 6-9 and exhausting through stack S-20
  - (C) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 10-13 and exhausting through stack S-20a
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Two (2) strip dryers, #1 and #2 with a rated capacity of 3.0 MMBtu per hour each fired by natural gas

- (7) One (1) roll rig with a rated capacity of 3.0 MMBtu per hour fired by natural gas and exhausting through a roof monitor
  - (8) Drying oven fired by natural gas and rated at 7.8 MMBtu per hour exhausting through roof monitor
- (c) Continuous Anneal Line (installed in 1961), with a capacity rate of 46.2 net tons per hour and 77.8 MMBtu/hr, consisting of the following:**
- (1) Alkaline Electrolytic Cleaning Section (I017) with a fume washer and exhausting through stack S004
  - (2) Annealing Furnace (U007) fired by natural gas and exhausting through a roof vent
  - (3) Two (2) 1.0 MMBtu per hour natural gas-fired strip dryers
- (d) Batch Annealing Furnaces (Installed in 1961), with a total capacity rate of 125.6 tons of steel coils per hour and 149 MMBtu/hr heat input, consisting of the following:**
- Twenty (20) Multi Stack Batch Annealing Furnaces with fifty (50) Multi Stack bases (U008), fired by natural gas and exhausting through three (3) wall-mounted building vents
- (e) Pickle Line (Installed in 1961), with a capacity rate of 165.5 tons per hour of steel, consisting of the following:**
- (1) Four (4) acid pickling tubs and one (1) rinse tub, (U010), with emissions controlled by a packed-bed scrubber at a design capacity of 58,000 cfm, designated as control device (C010), with emissions exhausting through stack S012
  - (2) One (1) 30,000 gallon spent pickle liquor (SPL) tank, with emissions controlled by a packed-bed scrubber, designated as control device (C010), with emission exhausting through stack S012
  - (3) Four (4) 10,000 gallon offline pickle solution storage tanks with uncontrolled fugitive emissions exhausting through vent F020
- (f) 80" Cold Reduction Mill (Tandem Mill) (Installed in 1970), with a capacity rate of 131.3 net tons steel per hour, consisting of the following:**
- 80" Tandem Mill (U011) with four (4) oil mist eliminators (C011), exhausting through roof vents S010a and S010b
- (g) 52" Cold Reduction Mill (Tandem Mill) (Installed in 1961), with a capacity rate of 73.6 net tons of steel per hour, consisting of the following:**
- 52" Tandem Mill (U012) with two (2) oil mist eliminators (C012), exhausting through stack U011a and stack U011b
- (h) No. 3 Galvanizing Line (Installed in 1998), with a capacity rate of 50 net tons of steel per hour, consisting of the following:**
- (1) Water, Alkaline and Brush Cleaning Section (U015a), consisting of a water cleaning section with steam fired heater, an alkali cleaning section with steam fired heater and a brush cleaning and rinse section with steam fired heater with a common fume scrubber (C026) and exhausting through stack S026

- (2) Direct-fire Furnace Section (U015b), consisting of a furnace with a direct fired section containing a 50 MMBtu per hour natural gas-fired burner with emissions controlled by Selective Non-Catalytic NOx Reduction providing seventy-six percent (76%) reduction (C025) and exhausting through stack S025
  - (3) Radiant Tube Anneal Section (U015c), consisting of a radiant tube heat section with a 10 MMBtu per hour natural gas-fired burner, and a radiant tube soak section with a 4 MMBtu per hour natural gas-fired burner exhausting through roof monitor (M015)
  - (4) Hot Dip Galvanize Coating Section and Chemical Treatment, consisting of a galvanizing coating section and a chemical treatment section
  - (5) Two (2) strip dryers: Strip #1 with a 1.85 MMBtu per hour natural gas-fired burner and Strip #2 with a 2.5 MMBtu per hour natural gas-fired burner exhausting through roof monitor
  - (6) Temper mill leveling section with water wash
  - (7) Oil coating section
  - (8) One (1) roll rig
  - (9) Two (2) roll coaters placed in series, identified as RC-1 and RC-2, with a maximum acrylic application rate of 130 pounds per hour
  - (10) One (1) electric curing oven, identified as CO-1
  - (11) One (1) cooling unit
- (i) Electrolytic Cleaning Line (Installed in 1963), with a capacity rate of 43.4 net tons of steel per hour, consisting of the following:**
- Alkaline Electrolytic Cleaning Tubs (U021) with a fume washer (C021) and exhausting through stack S006
- (j) Chrome Electroplate Line (Installed in 1972), with a capacity rate of 31.4 net tons of steel per hour, consisting of the following:**
- (1) Alkaline Electrolytic Cleaning Section (I018) with a fume washer and exhausting through stack S001
  - (2) Acid Cleaning Section (U014) with a fume washer (C014) and exhausting through stack S001
  - (3) Electroplating Section with Rinse and Chemical Treatment Tanks (I007) with a fume washer and exhausting through stack S001
- (k) Temper Mills with a capacity rate of 125.6 net tons of steel per hour at the Sheet Temper Mill (installed 1961), a capacity of 39.4 net tons of steel per hour at the No. 1 Tin Temper Mill (installed 1961) and a capacity of 70.8 net tons of steel per hour at the No. 2 Tin Temper Mill (installed 1972), consisting of the following:**
- (1) No. 1 Tin Temper Mill (Tin Plate) (I001) exhausting through roof monitor
  - (2) No. 2 Tin Temper Mill (Tin Plate) (I002) exhausting through roof monitor

- (3) Sheet Temper Mill (I008) with an oil mist eliminator and exhausting through stack S027

**(I) Tin Electroplate Line (Installed 1972), with a capacity rate of 38.2 net tons of steel per hour, consisting of the following:**

- (1) Alkaline Cleaning Section (I003) with a fume washer exhausting through stack S002
- (2) Acid Cleaning Section (I004) with a fume washer exhausting through stack S002
- (3) Electroplating Section with rinse (I005) exhausting to a fume scrubber and exhausting through stack S003
- (4) Chemical Treatment Section (I006) with a fume washer exhausting through stack S003
- (5) Two (2) Tin Cast Shop Melt Furnaces (0.5 MMBtu/hr each) fired by natural gas and exhausting through stack S028

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) Machining where an aqueous cutting coolant continuously floods the machining interface. [326 IAC 6-3-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (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 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including: [326 IAC 6-3-2]
  - (1) Wheelabrator roll shot blast No.1 (I009) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S005
  - (2) Wheelabrator roll shot blast No.2 (I010) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S007
- (e) Lime hopper (I012)[326 IAC 6-3-2]
- (f) Oil recovery facility (Oil Tech) (I024)
  - (1) Two (2) process oil tanks (T-1 and T-2) with a capacity of 18,000 gallons each
  - (2) One (1) final product oil storage tank (T-3) with a capacity of 20,000 gallons
  - (3) Control equipment for the processing operation, which includes odor abatement system consisting of a condenser (CE1) to reduce steam and a packed tower

scrubber (CE2) for odor control and emission control, exhausting through stack 1.

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

---

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

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

## SECTION B

## GENERAL CONDITIONS

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

---

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

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

---

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]

---

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)]

---

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)]

---

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

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

---

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

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

---

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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)]

---

(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)]

---

- (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]

- (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 Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

Northwest Regional Office Telephone Number: (219) 757-0265  
Northwest Regional Office Facsimile Number: (219) 757-0267

- (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) The 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]**

- (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.

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

by 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]

---

(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]**

---

- (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]**

---

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]**

---

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

---

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

Indiana Department of Environmental Management  
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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

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

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

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

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

C.6 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 are in operation.

C.7 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.8 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) Demolition and renovation  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) Indiana 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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

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

---

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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.10 Compliance Requirements [326 IAC 2-1.1-11]

---

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

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

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

---

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.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to CP 127-4814, issued on February 12, 1996.

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

---

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)]**

---

- (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 (2%) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a 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 (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]**

---

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]

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

---

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

C.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, OAQ 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 requirements.

- (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 response 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]**

---

- (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 response action 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]**

---

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
  - (1) starting in 2007 and every three (3) years thereafter, and
  - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

- (c) 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 monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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**

---

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

**(a) No. 1 Galvanizing Line (Also known as 48" Galvanizing Line) (Installed in 1960), with a capacity rate of 28.5 net tons of steel coated per hour and 50.3 MMBtu/hr heat input, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section (I020) with a fume washer and exhausting through stack S008
- (3) Annealing Furnace Section (U005) fired by natural gas and exhausting through stack S023
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Post Anneal Furnace fired with natural gas and exhausting through stack S023a
- (7) Roll Rig fired by natural gas exhausting through roof monitor

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 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the No.1 Galvanizing line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

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

At a process weight rate of 28.5 tons per hour for the No. 1 Galvanizing line, the allowable PM emission rate shall not exceed 38.7 pounds per hour.

#### D.1.2 Sulfur Dioxide [326 IAC 7-1.1-1]

In order to minimize SO<sub>2</sub> emissions from the pre-melt kettle, annealing furnace section (U005), post anneal furnace and roll rig shall be fired by natural gas only.

#### D.1.3 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 this facility and its control device.

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

**(b) No. 2 Galvanizing Line (Also known as 72" Galvanizing Line) (Installed in 1970 and modified 1997), with a capacity rate of 51.4 net tons per hour of steel, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas and exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section consisting of an electrolytic cleaning tank, a scrubber tank and a hot water rinse tank (U006a) with a fume washer (C006) and exhausting through stack S009
- (3) Annealing Furnace Section (U006b)
  - (A) 149 natural gas burners, each with a rated capacity of 0.375 MMBtu per hour in furnace zones 1-5, exhausting through stack S-20
  - (B) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 6-9 and exhausting through stack S-20
  - (C) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 10-13 and exhausting through stack S-20a
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Two (2) strip dryers, #1 and #2 with a rated capacity of 3.0 MMBtu per hour each fired by natural gas
- (7) One (1) roll rig with a rated capacity of 3.0 MMBtu per hour fired by natural gas and exhausting through a roof monitor
- (8) Drying oven fired by natural gas and rated at 7.8 MMBtu per hour exhausting through roof monitor

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

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

#### D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the No. 2 Galvanizing Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

At a process weight rate of 51.4 tons per hour for the No. 2 Galvanizing line, the allowable PM emission rate shall not exceed 44.8 pounds per hour.

#### D.2.2 Emission Offset and Prevention of Significant Deterioration [326 IAC 2-3][326 IAC 2-2]

- (a) Pursuant to 326 IAC 2-2, 326 IAC 2-3 and CP 127-6706, issued November 19, 1996, as amended by Amendment 127-8296 issued on March 24, 1997, the emissions of oxides of

nitrogen (NOx) from No. 2 Galvanizing Line furnace exhausting through

- (1) stack S-20 shall not exceed 0.512 lbs/MMBtu; and
  - (2) stack S-20a shall not exceed 0.388 lbs/ MMBtu.
- (b) Pursuant to CP 127-6706 issued on November 19, 1996, condition 11, the seventeen (17) burners rated at maximum heat input capacity of 1.0 MMBtu/hr and the seventeen (17) burners rated at a maximum heat input capacity of 0.55 MMBtu/hr shall be removed from the furnace zones 6-9 prior to installation and operation of the new burners in furnace zones 6-9 and 10-13. This satisfies the requirements of emission offset requirements (326 IAC 2-3).
- (c) Pursuant to CP 127-6706 (modernization of the No. 2 Galvanizing line) issued November 19, 1996, condition 12, Boiler No. 1 used as an offset in CP127-5260 (Portside Energy Project) was required to be shutdown by April 30, 1997. This satisfies the requirements of emission offset requirements (326 IAC 2-3).

**D.2.3 Emission Offset and Prevention of Significant Deterioration [326 IAC 2-3][326 IAC 2-2]**

---

Pursuant to Amendment 127-8889 issued on December 8, 1997, the infrared drying oven shall only be fired by natural gas and shall have a maximum heat-input rate of 7.8 MMBtu/hr. Therefore, the PSD and emission offset requirements (326 IAC 2-2 and 326 IAC 2-3) do not apply.

**D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

---

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

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

**D.2.5 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]**

---

Within eighteen (18) months after issuance of this permit, the Permittee shall perform NOx testing on the Annealing Furnace Section (U006b) stacks S-20 and S-20a utilizing a testing method approved by the Commissioner in accordance with Section C - Performance Testing. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

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

**D.2.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records of annual fuel consumption and fuel type using emission factor derived from most recent stack test.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3 FACILITY OPERATION CONDITIONS

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

(c) **Continuous Anneal Line (installed in 1961), with a capacity rate of 46.2 net tons per hour and 77.8 MMBtu/hr, consisting of the following:**

- (1) Alkaline Electrolytic Cleaning Section (I017) with a fume washer and exhausting through stack S004
- (2) Annealing Furnace (U007) fired by natural gas and exhausting through a roof vent
- (3) Two (2) 1.0 MMBtu per hour natural gas-fired strip dryers

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 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Continuous Anneal Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 46.2 tons per hour for the Continuous Anneal Line, the allowable PM emission rate shall not exceed 43.8 pounds per hour.

##### D.3.2 Sulfur Dioxide [326 IAC 7-1.1-1]

In order to minimize SO<sub>2</sub> emissions from the annealing furnace section (U007) and strip dryers shall be fired by natural gas only.

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

**(d) Batch Annealing Furnaces (Installed in 1961), with a total capacity rate of 125.6 tons of steel coils per hour and 149 MMBtu/hr heat input, consisting of the following:**

Twenty (20) Multi Stack Batch Annealing Furnaces with fifty (50) Multi Stack bases (U008), fired by natural gas and exhausting through three (3) wall-mounted building vents

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 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Batch Annealing Furnaces shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 125.6 tons per hour for the Batch Annealing Furnaces, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

D.4.2 Sulfur Dioxide [326 IAC 7-1.1-1]

In order to minimize SO<sub>2</sub> emissions from the batch annealing furnaces (U008) shall be fired by natural gas only.

## SECTION D.5 FACILITY OPERATION CONDITIONS

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

**(e) Pickle Line (Installed in 1961), with a capacity rate of 165.5 tons per hour of steel, consisting of the following:**

- (1) Four (4) acid pickling tubs and one (1) rinse tub, (U010), with emissions controlled by a packed-bed scrubber at a design capacity of 58,000 cfm, designated as control device (C010), with emissions exhausting through stack S012
- (2) One (1) 30,000 gallon spent pickle liquor (SPL) tank, with emissions controlled by a packed-bed scrubber, designated as control device (C010), with emission exhausting through stack S012
- (3) Four (4) 10,000 gallon offline pickle solution storage tanks with uncontrolled fugitive emissions exhausting through vent F020

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 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

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

#### D.5.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR Part 63, Subpart CCC]

Pursuant to 40 CFR Part 63, Subpart CCC, the pickle line shall comply with the following requirements:

The Permittee shall not cause or allow to be discharged into the atmosphere from the affected pickling line:

- (a) Any gases that contain HCl in a concentration in excess of 18 ppmv; or
- (b) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

#### D.5.3 NESHAP Maintenance Requirements [40 CFR Part 63.1160, Subpart CCC]

The Permittee shall comply with the operation and maintenance requirements of 40 CFR Part 63.6(e) (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1160, Subpart CCC, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Title V Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (a) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (b) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;

- (c) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (d) Require an inspection of each scrubber at intervals of no less than 3 months with:
  - (1) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - (2) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - (3) Repair or replacement of droplet eliminator elements as needed;
  - (4) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - (5) Adjustment of damper settings for consistency with the required air flow.
- (e) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
- (f) The Permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement.
- (g) The Permittee shall maintain a record of each inspection, including each item identified in (d) above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

**D.5.4 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Pickle Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 165.5 tons per hour for the Pickle Line allowable PM emission rate shall not exceed 56.5 pounds per hour.

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

**D.5.5 Testing Requirements [40 CFR Part 63.1161, Subpart CCC]**

---

- (a) The Permittee shall conduct a performance test for each affected process or control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1161, Subpart CCC, the performance test shall meet the following minimum requirements:
  - (1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure

- simultaneously the mass flows of HCl at the inlet and the outlet of the control device or measure the concentration of HCl in gases exiting the process or the emission control device.
- (2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
  - (3) Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
- (b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate, as applicable. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR Part 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.
- (c) Performance tests shall be conducted according to an alternative schedule approved by IDEM, OAQ, every two and half (2.5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.
- (d) Pursuant to 40 CFR Part 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ, in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ, to review and approve the site-specific test plan required under 40 CFR Part 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.
- (e) The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under condition D.5.2 and D.5.3, if required:
- (1) Method 1, to determine the number and location of sampling points, with the exception that no sampling traverse point shall be within one inch of the stack or duct wall;
  - (2) Method 2, to determine gas velocity and volumetric flow rate;
  - (3) Method 3, to determine the molecular weight of the stack gas;
  - (4) Method 4, to determine the moisture content of the stack gas; and
  - (5) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the

atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:  $C_{HCl(ppmv)} = 0.659 C_{HCl(mg/dscm)}$ , where  $C_{(ppmv)}$  is concentration in ppmv and  $C_{(mg/dscm)}$  is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

- (6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

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

#### D.5.6 Monitoring Requirements [40 CFR Part 63.1162]

---

- (a) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if applicable, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR Part 63.1160(b)(2), if applicable.
- (b) Failure to record each of the operating parameters in 40 CFR Part 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR Part 63, Subpart CCC.
- (c) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
- (d) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.

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

#### D.5.7 Record Keeping Requirements [40 CFR Part 63.1165]

---

- (a) To document compliance with Conditions D.5.2 and D.5.3, the Permittee shall maintain the following records pursuant to 40 CFR Part 63.1165:
- (1) The Permittee, as required by 40 CFR Part 63.10(b)(2) (Subpart A, General Provisions), shall maintain general records for 5 years from the date of each record of:
- (A) The occurrence and duration of each startup, shutdown, or malfunction of operation;
- (B) The occurrence and duration of each malfunction of the air pollution control equipment;
- (C) All maintenance performed on the air pollution control equipment;
- (D) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;
- (E) All information necessary to demonstrate conformance with the startup

shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR Part 63.10(b)(2)(v))

- (F) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests.
  - (G) All results of initial or subsequent performance tests;
  - (H) If the Permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR Part 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;
  - (I) If the Permittee has been granted a waiver from the initial performance test under 40 CFR Part 63.7(h), a copy of the full request and approval or disapproval;
  - (J) All documentation supporting initial notifications and notifications of compliance status required by 40 CFR Part 63.9; and
  - (K) Records of any applicability determination, including supporting analyses.
- (2) Records specifically required under 40 CFR Part 63, Subpart CCC:
- (A) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used, if applicable;
  - (B) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent;
  - (C) Each maintenance inspection and repair, replacement, or other corrective action;
  - (D) The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ, for the life of the affected source or until the source is no longer subject to these provisions. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by IDEM, OAQ, for a period of 5 years after each revision to the plan.
- (b) Records maintained pursuant to the record keeping requirements of 40 CFR Part 63, Subpart CCC, shall be maintained on site for a period of 2 years. Records for the 3 previous years may be maintained off site.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements [40 CFR Part 63.1164]

---

- (a) As required by 40 CFR Part 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40 CFR Part 63.1163.
- (b) The Permittee of an affected source who is required to submit progress reports under 40 CFR Part 63.6(i), shall submit such reports to IDEM, OAQ, by the dates specified in the written extension of compliance.
- (c) The Permittee of an affected source is required to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.
  - (1) The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.
  - (2) If actions taken by an Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the owner/operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30<sup>th</sup> day following the end of each calendar half; and
  - (3) Any time an action taken by an Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR Part 63.10(d)(5)(ii).
- (d) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

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

- (f) **80" Cold Reduction Mill (Tandem Mill) (Installed in 1970), with a capacity rate of 131.3 net tons steel per hour, consisting of the following:**

80" Tandem Mill (U011) with four (4) oil mist eliminators (C011), exhausting through roof vents S010a and S010b

- (g) **52" Cold Reduction Mill (Tandem Mill) (Installed in 1961), with a capacity rate of 73.6 net tons of steel per hour, consisting of the following:**

52" Tandem Mill (U012) with two (2) oil mist eliminators (C012), exhausting through stack U011b

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 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the 80" Tandem Mill and 52" Tandem Mill shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) At a process weight rate of 131.3 tons per hour for the 80" Tandem Mill, the allowable PM emission rate shall not exceed 54.0 pounds per hour.
- (b) At a process weight rate of 73.6 tons per hour for the 52" Tandem Mill, the allowable PM emission rate shall not exceed 48.2 pounds per hour.

**SECTION D.7 FACILITY OPERATION CONDITIONS**

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

**(h) No. 3 Galvanizing Line (Installed in 1998), with a capacity rate of 50 net tons of steel per hour, consisting of the following:**

- (1) Water, Alkaline and Brush Cleaning Section (U015a), consisting of a water cleaning section with steam fired heater, an alkali cleaning section with steam fired heater and a brush cleaning and rinse section with steam fired heater with a common fume scrubber (C026) and exhausting through stack S026
- (2) Direct-fire Furnace Section (U015b), consisting of a furnace with a direct fired section containing a 50 MMBtu per hour natural gas-fired burner with emissions controlled by Selective Non-Catalytic NOx Reduction providing seventy-six percent (76%) reduction (C025) and exhausting through stack S025
- (3) Radiant Tube Anneal Section (U015c), consisting of a radiant tube heat section with a 10 MMBtu per hour natural gas-fired burner, and a radiant tube soak section with a 4 MMBtu per hour natural gas-fired burner exhausting through roof monitor (M015)
- (4) Hot Dip Galvanize Coating Section and Chemical Treatment, consisting of a galvanizing coating section and a chemical treatment section
- (5) Two (2) strip dryers: Strip #1 with a 1.85 MMBtu per hour natural gas-fired burner and Strip #2 with a 2.5 MMBtu per hour natural gas-fired burner exhausting through roof monitor
- (6) Temper mill leveling section with water wash
- (7) Oil coating section
- (8) One (1) roll rig
- (9) Two (2) roll coaters placed in series, identified as RC-1 and RC-2, with a maximum acrylic application rate of 130 pounds per hour
- (10) One (1) electric curing oven, identified as CO-1
- (11) One (1) cooling unit

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 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart SSSS] [40 CFR 63.5140(b)]

- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart SSSS. The Permittee must comply with these requirements on and after June 10, 2002.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

D.7.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil [40 CFR

---

Part 63, Subpart SSSS] [40 CFR 63.5100] [40 CFR 63.5110] [40 CFR 63.5130]

---

- (a) The provisions of 40 CFR Part 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/mcan/mcanpg.html>. Pursuant to 40 CFR 63.5130(a), the Permittee must comply with these requirements on and after June 10, 2005.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the coil coating lines.
- (d) Each coil coating line must limit organic HAP emissions to the levels specified in 40 CFR 63.5120.
- (e) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5110, and are applicable to the affected source.

D.7.3 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

---

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the No.3 Galvanizing Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 50 tons per hour for the No.3 Galvanizing Line, the allowable PM emission rate shall not exceed 44.6 pounds per hour.

D.7.4 Nitrogen Oxide (NOx) [326 IAC 2-2]

---

Pursuant to CP 127-4814 issued on February 12, 1996, the oxides of nitrogen (NOx) emissions from the Direct-Fire furnace section controlled by a Selective Non-Catalytic NOx Reduction unit shall not exceed 3.24 lbs/hr. Therefore, the PSD and emission offset requirements (326 IAC 2-2 and 326 IAC 2-3) do not apply.

D.7.5 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 this facility and its control device.

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

D.7.6 Selective Non-Catalytic NOx Reduction Unit

---

Pursuant to CP 127-4814, issued on February 12, 1996, the Selective Non-Catalytic NOx Reduction unit shall be in operation at all times that the direct fire section of the furnace is in operation.

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

D.7.7 Continuous Emission Monitoring

---

Pursuant to CP 127-4814, issued on February 12, 1996, a continuous emission monitor (CEM) system for NOx shall be installed and operated in accordance with 326 IAC 3-5 to ensure compliance with conditions D.7.4 and D.7.6:

- (a) The continuous emissions monitoring system (CEMS) shall measure NO<sub>x</sub> emissions rate in pounds per hour. The use of CEMS to measure and record the NO<sub>x</sub> hourly emission rates over a twenty-four (24) operating hour block averaging period is sufficient to demonstrate compliance with the limits established in the condition D.7.4. The source shall maintain records of emission rates in pounds per hour.
- (b) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7. The source shall also be required to maintain records of the amount of natural gas combusted per furnace on a monthly basis.

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

##### D.7.8 Record Keeping Requirements

- (a) To document compliance with Condition D.7.4 and D.7.7, the Permittee shall maintain records of the emission rate for NO<sub>x</sub> in pounds per hour.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### D.7.9 Reporting Requirements

- (a) The Permittee shall submit the records of excess NO<sub>x</sub> emissions (defined in 326 IAC 3-5-7 and 40 CFR Part 60.7) from the continuous emissions monitoring system.
- (b) Reports of excess NO<sub>x</sub> emissions shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### D.7.10 Notification Requirements [40 CFR 63.5180]

- (a) General. The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.5180, paragraphs (b) and (d).
- (b) Initial notification. The Permittee submitted the Initial Notification June 8, 2004.
- (c) Notification of compliance status. The Permittee must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.5130. The Notification of Compliance Status must contain the information specified in 40 CFR 63.9(h).

##### D.7.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart SSSS, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than September 10, 2004.

(c) The significant permit modification 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

**SECTION D.8 FACILITY OPERATION CONDITIONS**

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

(i) **Electrolytic Cleaning Line (Installed in 1963), with a capacity rate of 43.4 net tons of steel per hour, consisting of the following:**

Alkaline Electrolytic Cleaning Tubs (U021) with a fume washer (C021) and exhausting through stack S006

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.8.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Electrolytic Cleaning Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 43.4 tons per hour for the Electrolytic Cleaning Line, the allowable PM emission rate shall not exceed 43.3 pounds per hour.

## SECTION D.9 FACILITY OPERATION CONDITIONS

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

**(j) Chrome Electroplate Line (Installed in 1972), with a capacity rate of 31.4 net tons of steel per hour, consisting of the following:**

- (1) Alkaline Electrolytic Cleaning Section (I018) with a fume washer and exhausting through stack S001
- (2) Acid Cleaning Section (U014) with a fume washer (C014) and exhausting through stack S001
- (3) Electroplating Section with Rinse and Chemical Treatment Tanks (I007) with a fume washer and exhausting through stack S001

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.9.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Chrome Electroplate line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 31.4 tons per hour for the Chrome Electroplate line, the allowable PM emission rate shall not exceed 40.4 pounds per hour.

**SECTION D.10 FACILITY OPERATION CONDITIONS**

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

**(k) Temper Mills with a capacity rate of 125.6 net tons of steel per hour at the Sheet Temper Mill (installed 1961), a capacity of 39.4 net tons of steel per hour at the No. 1 Tin Temper Mill (installed 1961) and a capacity of 70.8 net tons of steel per hour at the No. 2 Tin Temper Mill (installed 1972), consisting of the following:**

- (1) No. 1 Tin Temper Mill (Tin Plate) (I001) exhausting through roof monitor
- (2) No. 2 Tin Temper Mill (Tin Plate) (I002) exhausting through roof monitor
- (3) Sheet Temper Mill (I008) with an oil mist eliminator and exhausting through stack S027

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.10.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Temper Mills shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) At a process weight rate of 39.4 tons per hour for the No. 1 Tin Temper Mill, the allowable PM emission rate shall not exceed 42.4 pounds per hour.
- (b) At a process weight rate of 70.8 tons per hour for the No. 2 Tin Temper Mill, the allowable PM emission rate shall not exceed 47.9 pounds per hour.
- (c) At a process weight rate of 125.6 tons per hour for the Sheet Temper Mill, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

**SECTION D.11 FACILITY OPERATION CONDITIONS**

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

**(I) Tin Electroplate Line (Installed 1972), with a capacity rate of 38.2 net tons of steel per hour, consisting of the following:**

- (1) Alkaline Cleaning Section (I003) with a fume washer exhausting through stack S002
- (2) Acid Cleaning Section (I004) with a fume washer exhausting through stack S002
- (3) Electroplating Section with rinse (I005) exhausting to a fume scrubber and exhausting through stack S003
- (4) Chemical Treatment Section (I006) with a fume washer exhausting through stack S003
- (5) Two (2) Tin Cast Shop Melt Furnaces (0.5 MMBtu/hr each) fired by natural gas and exhausting through stack S028

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.11.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the Tin Electroplate line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 38.2 tons per hour for the Tin Electroplate line, the allowable PM emission rate shall not exceed 42.1 pounds per hour.

## SECTION D.12 FACILITY OPERATION CONDITIONS

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

### Insignificant Activities:

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface. [326 IAC 6-3-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (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 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including: [326 IAC 6-3-2]
  - (1) Wheelabrator roll shot blast No.1 (I009) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015, exhausting through stack S005
  - (2) Wheelabrator roll shot blast No.2 (I010) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015, exhausting through stack S007
- (e) Lime hopper (I012)[326 IAC 6-3-2]

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.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]

Pursuant to 40 CFR 52 Subpart P and 326 IAC 6-3-2, the PM from the above cited processes shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

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

#### D.12.2 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 Permittee of a cold cleaner degreaser without remote solvent reservoirs shall ensure that the following 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°C) (one hundred degrees Fahrenheit (100°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°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°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 Permittee of a cold cleaning facility shall ensure that the following 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 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.12.3 Organic Solvent Degreasing Operations [326 IAC 8-3-8]

---

Pursuant to 326 IAC 8-3-8 (Organic Solvent Degreasing Operations: material requirements for cold cleaning degreasers), on and after May 1, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

#### D.12.4 Record Keeping Requirements

---

- (a) In order to comply with D.12.3, the Permittee subject to the requirements of 326 IAC 8-3-8 c)(2)(B) shall maintain each of the following records for each purchase:
- (1) The name and address of the solvent supplier.
  - (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty -eight (68) degrees Fahrenheit).
- All records required shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**SECTION D.13 FACILITY OPERATION CONDITIONS**

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

**(f) Oil recovery facility (Oil Tech) (I024)**

- (1) Two (2) process oil tanks (T-1 and T-2) with a capacity of 18,000 gallons each
- (2) One (1) final product oil storage tank (T-3) with a capacity of 20,000 gallons
- (3) Control equipment for the processing operation, which includes odor abatement system consisting of a condenser (CE1) to reduce steam and a packed tower scrubber (CE2) for odor control and emission control, exhausting through stack 1.

(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.13.1 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels)**

(a) The final product oil storage tank (T-3) is subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of the tank is greater than 40 m<sup>3</sup> and is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984. Pursuant to this rule, the Permittee must maintain records as required by 40 CFR 60.116b(a) and 60.116b(b).

(b) The final product oil storage tank (T-3) is exempt from the General Provisions (Part 60, Subpart A) and from the provisions of subpart Kb, except as specified in 40 CFR 60.116b(a) and 60.116b(b), because the tank has a capacity less than 75 m<sup>3</sup> storing liquid.

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

**D.13.2 Record Keeping Requirements**

Pursuant to 40 CFR Part 60.116b:

- (a) The owner or operator shall keep copies of all records required by 40 CFR Part 60.116b (a), except for the record required by 40 CFR Part 60.116b (b), for at least 2 years. The record required by 40 CFR Part 60.116b(b) will be kept for the life of the source.
- (b) The owner or operator of each storage vessel as specified in 40 CFR Part 60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage vessel with a design capacity less than 75 m<sup>3</sup> is subject to no provision of this subpart other than those required by 40 CFR Part 60.110b(a).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: US Steel-Midwest Plant  
Source Address: U.S. Route 12, Portage, Indiana 46368  
Mailing Address: U.S. Route 12, Portage, Indiana 46368  
Part 70 Permit No.: T127-7403-00009

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

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: US Steel-Midwest Plant  
Source Address: U.S. Route 12, Portage, Indiana 46368  
Mailing Address: U.S. Route 12, Portage, Indiana 46368  
Part 70 Permit No.: T127-7403-00009

**This form consists of 2 pages**

**Page 1 of 2**

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

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- 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  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: US Steel-Midwest Plant  
 Source Address: U.S. Route 12, Portage, Indiana 46368  
 Mailing Address: U.S. Route 12, Portage, Indiana 46368  
 Part 70 Permit No.: T127-7403-00009

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

<p>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".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

<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: U.S. Steel-Midwest Plant  
Source Location: U.S. Route 12, Portage, Indiana 46368  
County: Porter  
SIC Code: 3316  
Operation Permit No.: T127-7403-00009  
Permit Reviewer: Teresa Freeman

On November 10, 2003, the Office of Air Quality (OAQ) had a notice published in The Times in Munster, Indiana, stating that U.S. Steel-Midwest Plant had applied for a Part 70 Operating Permit to operate a stationary steel finishing facility. 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:**

IDEM has revised the condition C.7 in order to clarify what parts of the regulation are not federally enforceable as follows:

**C.7** 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(~~d~~), (~~e~~), and (~~f~~), and 326 IAC 1-7-5(**a**), (**b**), and (d) are not federally enforceable.

**Change 2:**

In condition C.9, the term "source" is replaced with "Permittee" as follows:

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

---

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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 ~~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 3:**

In condition C.16, the term "source" is replaced with "Permittee" as follows:

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

---

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

**Change 4:**

Condition C.17 - 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. 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
  - (2) If none of the reasonable response steps listed in the Compliance Response 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 **response** 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.

#### Change 5:

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. Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). In accordance with the compliance schedule in 326 IAC 2-6-3, an emission statement must be submitted triennially by July 1 beginning in 2007 and every 3 years after. This source which is located in Porter County also has potential to emit greater than or equal to 25 tons of NO<sub>x</sub>; therefore, an emission statement covering the previous calendar year must be submitted by July 1 of any year that the source is not already required to submit a statement if the source emits NO<sub>x</sub> into the ambient air at levels equal to or greater than 25 tpy.

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) **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:**
- (1) **starting in 2007 and every three (3) years thereafter, and**
  - (2) **any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.**
- (b) **The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**

- (1) **Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
- (2) **Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.**

**The statement must be submitted to:**

~~(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).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, 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 6:**

In condition C.21, 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]**

- (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 7:**

Condition C.23 has been deleted. The condition was placed in the draft permit because of the possibility of the remaining source categories applying to USS-Midwest prior to their promulgation. The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source does not include one or more units that belong to one or more of the remaining source categories affected by the Section 112(j) maximum achievable control technology (MACT) Hammer date of May 15, 2002. The Permittee submitted a Section 112(j) Part 1 MACT Application stating that the source was subject to Section 112(j) for the following source categories: Industrial, Commercial, and Institutional Boilers and Process Heaters (40 CFR 63, Subpart DDDDD). However, since that time, the U.S. EPA has promulgated MACT standards for

those source categories in 40 CFR Part 63; therefore, the source is no longer subject to Section 112(j) for those source categories. However, after promulgation of the rule, it was determined that Subpart DDDDD did not apply to this source. As a result, the Permittee shall comply with the applicable MACT standards in D.5, which are included in this permit, in accordance with the compliance schedules provided in the MACT standards.

## **Part 2 MACT Application Submittal Requirement**

~~C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

---

- ~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~
- ~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~
- ~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~
  - ~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~
  - ~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~
- ~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification 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~~

~~and~~

~~United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

## **Change 8:**

Condition D.5.6 has been changed to correct duplicated phrasing (renumbered accordingly) and to change the word "required" for "applicable" to clarify that recirculation water rate is only required if applicable.

D.5.6 Monitoring Requirements [40 CFR Part 63.1162]

---

- ~~(a) The Permittee of a new, reconstructed, or existing steel pickling facility shall:~~

- (4a) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if ~~required~~ **applicable**, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR Part 63.1160(b)(2) if ~~required~~ **applicable**.
- (2b) Failure to record each of the operating parameters in 40 CFR Part 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR Part 63, Subpart CCC.
- (3c) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
- (4d) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.

**Change 9:**

Condition D.5.7 (2)(A) is revised to clarify that records of recirculation water rate is only required if applicable. Condition D.5.8 has been changed to add the phrase "is required" and to change Permittee to owner/operator in (c)(2) as stated in the NESHAP.

D.5.7 Record Keeping Requirements [40 CFR Part 63.1165]

- (2) Records specifically required under 40 CFR Part 63, Subpart CCC:
  - (A) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used, **if applicable**;
  - (B) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent;
  - (C) Each maintenance inspection and repair, replacement, or other corrective action;
  - (D) The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ for the life of the affected source or until the source is no longer subject to these provisions. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by IDEM, OAQ for a period of 5 years after each revision to the plan.
- (b) Records maintained pursuant to the record keeping requirements of 40 CFR Part 63, Subpart CCC, shall be maintained on site for a period of 2 years. Records for the 3 previous years may be maintained off site.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.8 Reporting Requirements [40 CFR Part 63.1164]

- (a) As required by 40 CFR Part 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40

CFR Part 63.1163.

- (b) The Permittee of an affected source who is required to submit progress reports under 40 CFR Part 63.6(i), shall submit such reports to IDEM, OAQ by the dates specified in the written extension of compliance.
- (c) The Permittee of an affected source **is required** to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.
  - (1) The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.
  - (2) If actions taken by an Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the ~~Permittee~~ **owner/operator** or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30<sup>th</sup> day following the end of each calendar half; and
  - (3) Any time an action taken by an Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR Part 63.10(d)(5)(ii).
- (d) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

**Change 10:**

The rule cite in Section D.13 contains an error and has been corrected as follows:

**Record Keeping and Reporting Requirements** ~~[326 IAC 2-8-4(3)] [326 IAC 2-8-16]~~ **[326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**Change 11:**

Condition D.13.2 was incorrectly labeled D.1.2.

D.13.2 Record Keeping Requirements

**Change 12:**

Conditions D.1.1, D.2.1, D.3.1, D.4.1, D.5.4, D.6.1, D.7.1, D.8.1, D.9.1, D.10.1, D.11.1 and D.12.1 have been changed to correct the rule cite. 326 IAC 6-3-2 was being revised during drafting of this permit, so 40 CFR 52, Subpart P, signifying that it is SIP approved was substituted as the rule cite. Since both rules are applicable, both will be included in the conditions.

D.1.1 Particulate Matter (PM) [40 CFR 52 Subpart P] **[326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the No.1 Galvanizing line shall not exceed the pounds per hour emission rate established as “E” in the following equation:

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

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

At a process weight rate of 28.5 tons per hour for the No. 1 Galvanizing line, the allowable PM emission rate shall not exceed 38.7 pounds per hour.

**D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the No. 2 Galvanizing Line shall not exceed the pounds per hour emission rate established as “E” in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 51.4 tons per hour for the No. 2 Galvanizing line, the allowable PM emission rate shall not exceed 44.8 pounds per hour.

**D.3.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Continuous Anneal Line shall not exceed the pounds per hour emission rate established as “E” in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 46.2 tons per hour for the Continuous Anneal Line, the allowable PM emission rate shall not exceed 43.8 pounds per hour.

**D.4.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Batch Annealing Furnaces shall not exceed the pounds per hour emission rate established as “E” in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 125.6 tons per hour for the Batch Annealing Furnaces, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

**D.5.4 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Pickle Line shall not exceed the pounds per hour emission rate established as “E” in the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

At a process weight rate of 165.5 tons per hour for the Pickle Line allowable PM emission rate shall not exceed 56.5 pounds per hour.

**D.6.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the 80" Tandem Mill and 52" Tandem Mill shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) At a process weight rate of 131.3 tons per hour for the 80" Tandem Mill, the allowable PM emission rate shall not exceed 54.0 pounds per hour.
- (b) At a process weight rate of 73.6 tons per hour for the 52" Tandem Mill, the allowable PM emission rate shall not exceed 48.2 pounds per hour.

**D.7.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the No.3 Galvanizing Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 50 tons per hour for the No.3 Galvanizing Line, the allowable PM emission rate shall not exceed 44.6 pounds per hour.

**D.8.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Electrolytic Cleaning Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 43.4 tons per hour for the Electrolytic Cleaning Line, the allowable PM emission rate shall not exceed 43.3 pounds per hour.

**D.9.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Chrome Electroplate Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 31.4 tons per hour for the Chrome Electroplate Line, the allowable PM emission rate shall not exceed 40.4 pounds per hour.

**D.10.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Temper Mills shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) At a process weight rate of 39.4 tons per hour for the No. 1 Tin Temper Mill, the allowable PM emission rate shall not exceed 42.4 pounds per hour.
- (b) At a process weight rate of 70.8 tons per hour for the No. 2 Tin Temper Mill, the allowable PM emission rate shall not exceed 47.9 pounds per hour.
- (c) At a process weight rate of 125.6 tons per hour for the Sheet Temper Mill, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

**D.11.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the Tin Electroplate Line shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 38.2 tons per hour for the Tin Electroplate Line, the allowable PM emission rate shall not exceed 42.1 pounds per hour.

**D.12.1 Particulate Matter (PM) [40 CFR 52 Subpart P] [326 IAC 6-3-2]**

---

Pursuant to 40 CFR 52 Subpart P **and 326 IAC 6-3-2**, the PM from the above cited processes shall not exceed the pounds per hour emission rate established as "E" in the following equation:

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

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

**Change 13:**

Condition A.3 has been changed to add a bracket to the rule cite, to change the phrase for clarification on exhausts and correct some minor errors. The Facility Description Boxes (D.1 through D.13) have also been changed to match equipment listed in Condition A.3.

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

---

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

- (a) **No. 1 Galvanizing Line (Also known as 48" Galvanizing Line) (Installed in 1960), with a capacity rate of 28.5 net tons of steel produced per hour and 50.3 MMBtu/hr**

**heat input, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section (I020) with a fume washer and exhausting ~~out~~ **through** stack S008
- (3) Annealing Furnace Section (U005) fired by natural gas and exhausting ~~out~~ **through** stack S023
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Post Anneal Furnace fired with natural gas and exhausting through stack S023a
- (7) Roll Rig fired by natural gas exhausting through roof monitor

**(b) No. 2 Galvanizing Line (Also known as 72" Galvanizing Line) (Installed in 1970 and modified 1997), with a capacity rate of 51.4 net tons per hour of steel, consisting of the following:**

- (1) Pre-melt kettle fired by natural gas and exhausting through roof monitor
- (2) Alkaline Electrolytic Cleaning Section consisting of an electrolytic cleaning tank, a scrubber tank and a hot water rinse tank (U006a) with a fume washer (C006) and exhausting ~~out~~ **through** stack S009
- (3) Annealing Furnace Section (U006b)
  - (A) 149 natural gas burners, each with a rated capacity of 0.375 MMBtu per hour in furnace zones 1-5, exhausting through stack S-20
  - (B) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 6-9 and exhausting ~~out~~ **through** stack S-20
  - (C) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 10-13 and exhausting ~~out~~ **through** stack S-20a
- (4) Hot Dip Galvanize Coating Section
- (5) Chemical Treatment Section
- (6) Two (2) strip dryers, #1 and #2 with a rated capacity of 3.0 MMBtu per hour each fired by natural gas
- (7) One (1) roll rig with a rated capacity of 3.0 MMBtu per hour fired by natural gas and exhausting through a roof monitor
- (8) Drying oven fired by natural gas and rated at 7.8 MMBtu per hour exhausting through roof monitor

**(c) Continuous Anneal Line (installed in 1961), with a capacity rate of 46.2 net tons per hour and 77.8 MMBtu/hr, consisting of the following:**

- (1) Alkaline Electrolytic Cleaning Section (I017) with a fume washer and exhausting ~~out~~ **through** stack S004
  - (2) Annealing Furnace (U007) fired by natural gas and exhausting through a roof vent
  - (3) Two (2) 1.0 MMBtu per hour natural gas-fired strip dryers
- (d) Batch Annealing Furnaces (Installed in 1961), with a total capacity rate of 125.6 tons of steel coils per hour and 149 MMBtu/hr heat input, consisting of the following:**
- Twenty (20) Multi Stack Batch Annealing Furnaces with fifty (50) Multi Stack bases (U008), fired by natural gas and exhausting through three (3) wall-mounted building vents
- (e) Pickle Line (Installed in 1961), with a capacity rate of 165.5 tons per hour of steel, consisting of the following:**
- (1) Four (4) acid pickling tubs and one (1) rinse tub, (U010), with emissions controlled by a packed-bed scrubber at a design capacity of 58,000 cfm, designated as control device (C010), with emissions exhausting through stack S012
  - (2) One (1) 30,000 gallon spent pickle liquor (SPL) tank, with emissions controlled by a packed-bed scrubber, designated as control device (C010), with emission exhausting through stack S012
  - (3) Four (4) 10,000 gallon offline pickle solution storage tanks with uncontrolled fugitive emissions exhausting through vent F020
- (f) 80" Cold Reduction Mill (Tandem Mill) (Installed in 1970), with a capacity rate of 131.3 net tons steel per hour, consisting of the following:**
- 80" Tandem Mill (U011) with four (4) oil mist eliminators (C011), exhausting through roof vents S010a and S010b
- (g) 52" Cold Reduction Mill (Tandem Mill) (Installed in 1961), with a capacity rate of 73.6 net tons of steel per hour, consisting of the following:**
- 52" Tandem Mill (U012) with two (2) oil mist eliminators (C012), exhausting through stack U011a and stack U011b
- (h) No. 3 Galvanizing Line (Installed in 1998), with a capacity rate of 50 net tons of steel per hour, consisting of the following:**
- (1) Water, Alkaline and Brush Cleaning Section (U015a), consisting of a water cleaning section with steam fired heater, an alkali cleaning section with steam fired heater and a brush cleaning and rinse section with steam fired heater with a common fume scrubber (C026) and **exhausting ~~out~~ through** stack S026
  - (2) Direct-fire Furnace Section (U015b), consisting of a furnace with a direct fired section containing a 50 MMBtu per hour natural gas-fired burner with emissions controlled by Selective Non-Catalytic NOx Reduction providing seventy-six percent (76%) reduction (C025) and **exhausting ~~out~~ through** stack S025
  - (3) Radiant Tube Anneal Section (U015c), consisting of a radiant tube heat section with a 10 MMBtu per hour natural gas-fired burner, and a radiant tube soak section with a 4 MMBtu per hour natural gas-fired burner exhausting through roof monitor (M015)

- (4) Hot Dip Galvanize Coating Section and Chemical Treatment, consisting of a galvanizing coating section and a chemical treatment section
  - (5) Two (2) strip dryers: Strip #1 with a 1.85 MMBtu per hour natural gas-fired burner and Strip #2 with a 2.5 MMBtu per hour natural gas-fired burner exhausting through roof monitor
  - (6) Temper mill leveling section with water wash
  - (7) Oil coating section
  - (8) One (1) roll rig
  - (9) Two (2) roll coaters placed in series, identified as RC-1 and RC-2, with a maximum acrylic application rate of 130 pounds per hour
  - (10) One (1) electric curing oven, identified as CO-1
  - (11) One (1) cooling unit
- (i) Electrolytic Cleaning Line (Installed in 1963), with a capacity rate of 43.4 net tons of steel per hour, consisting of the following:**
- Alkaline Electrolytic Cleaning Tubs (U021) with a fume washer (C021) and exhausting ~~out~~ **through** stack S006
- (j) Chrome Electroplate Line (Installed in 1972), with a capacity rate of 31.4 net tons of steel per hour, consisting of the following:**
- (1) Alkaline Electrolytic Cleaning Section (I018) with a fume washer and exhausting ~~out~~ **through** stack S001
  - (2) Acid Cleaning Section (U014) with a fume washer (C014) and exhausting ~~out~~ **through** stack S001
  - (3) Electroplating Section with Rinse and Chemical Treatment Tanks (I007) with a fume washer and exhausting ~~out~~ **through** stack S001
- (k) Temper Mills with a capacity rate of 125.6 net tons of steel per hour at the Sheet Temper Mill (installed 1961), a capacity of 39.4 net tons of steel per hour at the No. 1 Tin Temper Mill (installed 1961) and a capacity of 70.8 net tons of steel per hour at the No. 2 Tin Temper Mill (installed 1972), consisting of the following:**
- (1) No. 1 Tin Temper Mill (Tin Plate) (I001) exhausting through roof monitor
  - (2) No. 2 Tin Temper Mill (Tin Plate) (I002) exhausting through roof monitor
  - (3) Sheet Temper Mill (I008) with an oil mist eliminator and exhausting through stack S027
- (l) Tin Electroplate Line (Installed 1972), with a capacity rate of 38.2 net tons of steel per hour, consisting of the following:**
- (1) Alkaline Cleaning Section (I003) with a fume washer exhausting through stack S002

- (2) Acid Cleaning Section (I004) with a fume washer exhausting through stack S002
- (3) Electroplating Section with rinse (I005) exhausting ~~to a through~~ fume scrubber and **exhausting out through** stack S003
- (4) Chemical Treatment Section (I006) with a fume washer exhausting through stack S003
- (5) Two (2) Tin Cast Shop Melt Furnaces (0.5 MMBtu/hr each) fired by natural gas and exhausting ~~out~~ **through** stack S028

#### Change 14:

Condition A.4 has been changed to correct the unit ID for of the shot blast units and to add Oil Tech equipment, which is listed separately in D.13, but is an insignificant activity. Also, the odor control equipment has been added to the Oil Tech equipment. Changes have also been made to Facility Description Boxes in D.12 and D.13

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) Machining where an aqueous cutting coolant continuously floods the machining interface. [326 IAC 6-3-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (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 6-3-2]
- (d) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including: [326 IAC 6-3-2]
  - (1) Wheelabrator roll shot blast No.1 (I009) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S005
  - (2) Wheelabrator roll shot blast No.4 2 (I010) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S007
- (e) Lime hopper (I012)[326 IAC 6-3-2]
- (mf) Oil recovery facility (Oil Tech) (I024)(insignificant activity)**
  - (1) **Two (2) process oil tanks (T-1 and T-2) with a capacity of 18,000 gallons each**
  - (2) **One (1) final product oil storage tank (T-3) with a capacity of 20,000 gallons**
  - (3) **Control equipment for the processing operation, which includes odor abatement system consisting of a condenser (CE1) to reduce steam and a packed tower scrubber (CE2) for odor control and emission control,**

**exhausting through stack 1.**

**Change 15:**

Condition B.11 has been changed to include the current phone numbers for the Northwest Regional Offices that recently moved to 8315 Virginia Street, Suite 1, Merrillville, IN 46410-9201.

**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 Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

Facsimile Number: 317-233-5967

Northwest Regional Office Telephone Number: ~~219-881-6712~~ **(219) 757-0265**

Northwest Regional Office Facsimile Number: ~~219-881-6745~~ **(219) 757-0267**

**Change 16:**

The heading **Emission Limitations and Standards [326 IAC 2-7-5(1)]** that was omitted from Sections D.10, D.11 and D.13 of the permit has been added.

**Change 17:**

Conditions D.12.2 and D.12.3 have been changed to include the rule cites.

**D.12.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]**

---

**D.12.3 Organic Solvent Degreasing Operations [326 IAC 8-3-8]**

---

**Change 18:**

A new Condition C.12 has been added and all subsequent conditions have been renumbered. USS-Midwest has chosen to continue to monitor NOx using a CEMS at the No. 3 Galvanizing Line, instead of limiting natural gas usage. Therefore the following change has been made:

---

**C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) **The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.**
- (b) **In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.**
- (c) **Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.**
- (d) **Nothing in this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to CP 127-4814, issued on February 12, 1996.**

**Change 19:**

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 has been incorporated into the permit to address credible evidence:

**B.25 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 20:**

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. Porter 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 steel finishing facility.

Responsible Official:	Plant Manager
Source Address:	U.S. Route 12, Portage, Indiana 46368
Mailing Address:	U.S. Route 12, Portage, Indiana 46368
General Source Phone Number:	(219)763-5869
SIC Code:	3316
County Location:	Porter
Source Location Status:	<del>Severe</del> Nonattainment for <b>1-hour ozone and 8-hour ozone standard</b> Unclassifiable for PM10 and SO2
Source Status:	Attainment for all other criteria pollutants Part 70 Permit Program (326 IAC 2-7-2) Major Source, under PSD and Emission Offset; (326 IAC 2-2 and 326 IAC 2-3) 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 Porter County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	unclassifiable
NO <sub>2</sub>	attainment
1-hour Ozone	<b>nonattainment</b>
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.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Porter County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
  - (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter 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.

### Change 21:

On June 8, 2004, USS-Midwest submitted initial notification to IDEM OAQ that 40 CFR Part 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil) was applicable to the No. 3 Galvanizing Line at this facility. The following changes have been made to Section D.7, the remaining conditions subsequently renumbered and changes made to Table of contents:

#### D.7.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A] [Table 2 to 40 CFR Part 63, Subpart SSSS] [40 CFR 63.5140(b)]

- 
- (a) The provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, except when otherwise specified by Table 2 to 40 CFR Part 63, Subpart SSSS. The Permittee must comply with these requirements on and after June 10, 2002.
  - (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by

the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.

**D.7.2 National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil [40 CFR Part 63, Subpart SSSS] [40 CFR 63.5100] [40 CFR 63.5110] [40 CFR 63.5130]**

---

- (a) The provisions of 40 CFR Part 63, Subpart SSSS (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil) apply to the affected source. A copy of this rule is available on the US EPA Air Toxics Website at <http://www.epa.gov/ttn/atw/mcan/mcanpg.html>. Pursuant to 40 CFR 63.5130(a), the Permittee must comply with these requirements on and after June 10, 2005.
- (b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.
- (c) The affected source is the collection of all of the coil coating lines.
- (d) Each coil coating line must limit organic HAP emissions to the levels specified in 40 CFR 63.5120.
- (e) Terminology used in this section are defined in the CAA, in 40 CFR Part 63, Section 63.2, and in 40 CFR 63.5110, and are applicable to the affected source.

**D.7.10 Notification Requirements [40 CFR 63.5180]**

---

- (a) **General.** The Permittee must submit the notifications in 40 CFR 40 CFR 63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections, except as provided in 40 CFR 63.5180, paragraphs (b) and (d).
- (b) **Initial notification.** The Permittee submitted the Initial Notification June 8, 2004.
- (c) **Notification of compliance status.** The Permittee must submit the Notification of Compliance Status required by 40 CFR 63.9(h) no later than 30 calendar days following the end of the initial compliance period described in 40 CFR 63.5130. The Notification of Compliance Status must contain the information specified in 40 CFR 63.9(h).

**D.7.11 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]**

---

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart SSSS, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than September 10, 2004.
- (c) The significant permit modification 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**

On January 12, 2004, Jim Alexander submitted comments on the U.S. Steel-Midwest Plant proposed Part 70 permit. The comments and IDEM responses (with language added shown in bold and language in ~~strikeout~~) are as follows:

**Comment 1:**

B.24 Advanced Source Modification Approval

This item is listed in the Table of Contents but is not included in Section B.

**Response 1:**

The reference to B.24 has been removed from the Table of Contents as follows:

~~B.24 — Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]~~

**Comment 2:**

C.6 Fugitive Dust Emissions

This item is listed in the Table of Contents but is not included in Section C. This has caused the numbering of Section C to be skewed. 326 IAC 6-1-11.1 are fugitive dust emission standards for Lake County. The Midwest Plant is not located in Lake County, therefore, these requirements would not otherwise apply.

**Response 2:**

The reference to Condition C.6 in the Table of Contents has been removed and the remaining Condition numbers appropriately renumbered.

~~C.6 — Fugitive Dust Emissions [326 IAC 6-1-11.1]~~

**Comment 3:**

Section D General: USS requests deletion of Section D items in the Table of Contents which are contemporaneous with the requested deletions detailed with the respective Section D comments below.

**Response 3:**

All conditions and condition numbers have been appropriately documented in the Table of Contents.

**Comment 4:**

D.5.5 Testing Requirements

USS requests an amendment to Item (c) for the Pickle Line as follows:

The facility has received approval by IDEM for an alternative testing schedule of every two and a half years (2.5) or twice during the Title V permit term (letter dated December 2, 2002).

**Response 4:**

Condition D.5.5(c) has been changed to reflect the approval quoted by the commentator. In addition condition D.5.5 (a) has been changed to remove reference to an initial performance test, which has been conducted after promulgation of the rule. A clarification was added that recirculation water rate is only required if applicable. The changes are as follows:

D.5.5 Testing Requirements [40 CFR Part 63.1161, Subpart CCC]

(a) ~~Within 6 months of permit issuance, The Permittee shall conduct an initial performance test for each affected process or control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1161, Subpart CCC, this initial~~  
**the** performance test shall meet the following minimum requirements:

- (1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device

- or measure the concentration of HCl in gases exiting the process or the emission control device.
- (2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
  - (3) Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
- (b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate, **as applicable**. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR Part 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.
- (c) Performance tests shall be conducted ~~either annually or~~ according to an alternative schedule approved by IDEM, OAQ, ~~but no less frequently than every two and half (2.5) years or twice per Part 70 Operating Permit term.~~ If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.
- (d) Pursuant to 40 CFR Part 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR Part 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.
- (e) The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under condition D.5.2 and D.5.3, if required:
- (1) Method 1, to determine the number and location of sampling points, with the exception that no sampling traverse point shall be within one inch of the stack or duct wall;
  - (2) Method 2, to determine gas velocity and volumetric flow rate;
  - (3) Method 3, to determine the molecular weight of the stack gas;
  - (4) Method 4, to determine the moisture content of the stack gas; and
  - (5) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being

demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:  $C_{HCL(ppmv)} = 0.659 C_{HCL(mg/dscm)}$ , where  $C_{(ppmv)}$  is concentration in ppmv and  $C_{(mg/dscm)}$  is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

- (6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

**Comment 5:**

D.7.2 (now 7.4)(Nitrogen Oxide (NOx))

At this time, USS wishes to retain the NOx limitation of 3.24 lb/hr; which includes a CEMS monitoring requirement, as specified in Condition 9 of the initial facility permit. USS reserves the right to apply for this permit modification in the future. USS respectfully requests deletion of the language in this section and replacement of this language with the requirements from the initial facility permit (CP 127-4814, issued on February 12, 1996).

**Response 5:**

National Steel had requested that a fuel limitation be added to the Direct-fire Furnace Operation, instead of requiring a Continuous Emissions Monitoring system (CEMs). IDEM agreed to the requested change and same was included in the draft permit that was published for public comment. USS Midwest has now requested that the original permit conditions from CP 127-4814, issued on February 12, 1996 be reinstated and they will continue to use the CEMs and meet original construction permit requirements. Condition D.7.2 has been changed as follows:

D.7.4 Nitrogen Oxide (NOx) [326 IAC 2-2]

~~In order to avoid the applicability of 326 IAC 2-2 (Prevention of Significant Deterioration), only natural gas shall be fired in the combustion units at the No. 3 Galvanizing line: Direct-fire Furnace Section (U015b) and the Radiant Tube Anneal Section (U015c). The NOx emissions for the No. 3 Galvanizing Line shall not exceed two hundred seventy (270) pounds per million cubic feet of natural gas burned and 285 million cubic feet per twelve (12) consecutive month period with compliance demonstrated at the end of each month.~~

~~The natural gas usage limit is the equivalent of 38.5 tons per year of NOx. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply to the No.3 Galvanizing line.~~

**Pursuant to CP 127-4814 issued on February 12, 1996, the oxides of nitrogen (NOx) emissions from the Direct-Fire furnace section controlled by a Selective Non-Catalytic NOx Reduction unit shall not exceed 3.24 lbs/hr. Therefore, the PSD and emission offset requirements (326 IAC 2-2 and 326 IAC 2-3) do not apply.**

**Comment 6:**

D.7.4 Testing Requirements

The draft permit states a requirement to test the Radiant Tube Anneal Section (in addition to testing the Direct-fire Furnace Section) to demonstrate compliance. This section of the galvanizing line is not a point source. This natural gas-fired burner system exhausts into the building structure and, subsequently, through the facility roof monitor. USS requests deletion of this requirement and retention of the initial permit language requirements for testing, which only includes testing for the direct-fired furnace section.

**Response 6:**

Condition D.7.4 has been deleted. The Radiant Tube Anneal Section is not a point source and should not have been included in the draft permit. USS Midwest has requested to retain original language from CP 127-4818 issued on February 12, 1996 that required CEMs for the Direct-fire Furnace Section to demonstrate continuous compliance. See Response 5 for more information.

~~D.7.4 Testing Requirements [326 IAC 2-7-6(1), (6)]~~

---

~~Within eighteen (18) months after issuance of this permit, the Permittee shall perform an initial compliance test of the No. 3 Galvanizing line: Direct-fire Furnace Section (U015b) and the Radiant Tube Anneal Section (U015c) to demonstrate compliance with Condition D.7.2. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.~~

Subsequent conditions in the permit have been renumbered.

**Comment 7:**

D.7.5 Scrubber Operation

USS believes this language is irrelevant and requests deletion of this language for the reasons stated in the comments to Section D.7.6 below. We request replacement of Section D.7.5 with the language provided below:

*D.7.5 Selective Non-Catalytic NOx Reduction Unit*

*Pursuant to CP 127-4814, issued on February 12, 1996, the Selective Non-Catalytic NOx Reduction unit shall be operated at all times that the direct fire section of the furnace is operated.*

**Response 7:**

The scrubbers used for the water cleaning section, alkaline cleaning section and brush cleaning and rinse section is for OSHA purposes. These types of operations do not generate significant amounts of particulates and are used to control fumes. Condition D.7.4 (Condition D.7.5 in the draft permit) has been changed to require operation of the Selective Non-Catalytic NOx Reduction Unit (SCR) that has been reinstated from the original construction permit. See also Response 5 for more information.

~~D.7.5 Scrubber Operation~~

---

~~Pursuant to CP 127-4814, issued on February 12, 1996, the scrubber shall be operated at all times when the water cleaning section, alkaline cleaning section, and brush cleaning and rinse section are in operation.~~

**D.7.6 Selective Non-Catalytic NOx Reduction Unit**

---

**Pursuant to CP 127-4814, issued on February 12, 1996, the Selective Non-Catalytic NOx Reduction unit shall be in operation at all times that the direct fire section of the furnace is in operation.**

**Comment 8:**

D.7.6 Scrubber Monitoring

USS requests deletion of this requirement. This scrubber unit controls soapy mist and was installed exclusively for hygiene and safety purposes. This unit is not related to the furnace sections of the line. Wet fume scrubbers are typically used on alkaline cleaner lines to remove excess hydrogen from the process tanks to prevent explosion and injury to personnel, and damage to equipment. This unit was not installed to control regulated pollutants and, in fact, the absence of this control system would not impact emissions at this facility. We do not believe is the intent of the CAA or IDEM to regulate control systems designed for hygiene and safety purposes to satisfy OSHA requirements. USS wishes to retain the requirements of the initial facility permit, CP 127-4814, Condition 10, and requests insertion of the language below.

- (a) Pursuant to CP 127-4814, issued on February 12, 1996, a continuous emission monitor (CEM) system for NO<sub>x</sub> shall be installed and operated in accordance with 326 IAC 3-5 to ensure compliance with conditions D.7.2 and D.7.5:
- (1) The continuous emissions monitoring system (CEMS) shall measure NO<sub>x</sub> emissions rate in pounds per hour. The use of CEMS to measure and record the NO<sub>x</sub> hourly emission rates over a twenty-four (24) operating hour block averaging period is sufficient to demonstrate compliance with the limits established in the condition D.7.2. The source shall maintain records of emission rates in pounds per hour.
  - (2) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4. (SOP submitted in November 1999)
  - (3) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7. The source shall also be required to maintain records of the amount of natural gas combusted per furnace on a monthly basis.
  - (4) The source may submit to the OAQ alternative emission factors based on the source's CEMS data (collected over one (1) season of operation; where a season is defined as the period of time from May 1 through September 30) and the corresponding site temperatures, to use in lieu of the vendor provided emission factors in instances of downtime. The alternative emissions factors must be approved by the OAQ prior to use in calculating emissions for the limitations established in this permit. The alternative emission factors shall be based upon collected monitoring and test data supplied from an approved continuous emissions monitoring system. In the event that the information submitted does not contain sufficient data to establish appropriate emission factors, the source shall continue to collect data until appropriate emission factors can be established.

#### **Response 8:**

The scrubbers used for the water cleaning section, alkaline cleaning section and brush cleaning and rinse section are for OSHA purposes. These types of operations do not generate significant amounts of particulates and are used to control fumes, therefore Condition D.7.6 Scrubber Monitoring has been deleted from the permit. Condition D.7.5 has been added to require operation of the Selective Non-Catalytic NO<sub>x</sub> Reduction Unit (SCR) that has been reinstated from the original construction permit. See also Response 5 for more information.

#### **~~D.7.6 Scrubber Monitoring~~**

---

~~Pursuant to CP 127-4814, issued on February 12, 1996, the pressure drop and flow rate of the scrubber shall be monitored at the beginning of each shift and readings recorded. When for any one reading, the pressure drop across the discharge (breaker) scrubber is outside the normal range of 4.9 - 10.9 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 reading that is outside the ranges 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.7.7 Continuous Emission Monitoring**

---

**Pursuant to CP 127-4814, issued on February 12, 1996, a continuous emission monitor (CEM) system for NO<sub>x</sub> shall be installed and operated in accordance with 326 IAC 3-5 to ensure compliance with conditions D.7.4 and D.7.6:**

- (a) **The continuous emissions monitoring system (CEMS) shall measure NO<sub>x</sub> emissions rate in pounds per hour. The use of CEMS to measure and record the NO<sub>x</sub> hourly emission rates over a twenty-four (24) operating hour block averaging period is sufficient to demonstrate compliance with the limits established in the condition D.7.2. The source shall maintain records of emission rates in pounds per hour.**
- (b) **The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7. The source shall also be required to maintain records of the amount of natural gas combusted per furnace on a monthly basis.**

**Comment 9:**

D.7.7 (now D.7.8) Record Keeping Requirements

Item (a) states "...records documenting compliance with D.7.7, shall be maintained..." USS believes this to be a typographical error and should state "...records documenting compliance with Condition D.7.2 shall maintained..."

Since the facility wishes to retain the NO<sub>x</sub> CEMS for compliance monitoring, USS requests that item (b) be replaced with the following:

*To document compliance with Condition D.7.2 and D.7.6, the Permittee shall maintain records of the emission rate for NO<sub>x</sub> in pounds per hour.*

**Response 9:**

D.7.8 Record Keeping Requirements

---

- (a) **To document compliance with Condition D.7.4 and D.7.7, the Permittee shall maintain records of the emission rate for NO<sub>x</sub> in pounds per hour.**
- ~~(a) Pursuant to CP 127-4814, issued on February 12, 1996, records documenting compliance with D.7.6 shall be maintained at the source for a minimum period of two (2) years and be made available upon request of the IDEM, OAQ.~~
- ~~(b) To document compliance with Condition D.7.2, the Permittee shall maintain records of natural gas usage at the No. 3 Galvanizing Line.~~
- (eb) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 10:**

USS requests that this section be replaced with the following:

- (a) *The Permittee shall submit the records of excess NO<sub>x</sub> emissions (defined in 326 IAC 3-5-7 and 40 CFR Part 60.7) from the continuous emissions monitoring system.*
- (b) *Reports of excess NO<sub>x</sub> emissions shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit.*

**Response 10:**

~~D.7.8 Reporting Requirements~~

---

~~A quarterly summary of the information to document compliance with Condition D.7.7 (b) 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.~~

#### **D.7.9 Reporting Requirements**

---

- (a) The Permittee shall submit the records of excess NOx emissions (defined in 326 IAC 3-5-7 and 40 CFR Part 60.7) from the continuous emissions monitoring system.**
- (b) Reports of excess NOx emissions shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

#### **Comment 11:**

Section D.13 Oil Recovery Facility (Oil Tech)

The permit states that the final oil storage tank T-3 (20,000 gallons) is subject to 40 CFR 60, Subpart Kb. This rule provides an exemption at 40 CFR 60.110b (d)(4) which states, ‘vessels with a design capacity less than or equal to 1589.874 m<sup>3</sup> (419, 884 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer.’ Therefore, USS believes this rule is not applicable to this facility and requests that this section (D.13) be deleted. We request that this facility be listed in Section D.12 as an insignificant activity.

#### **Response 11:**

The exemption under 40 CFR 60.110b (d)(4) applies to petroleum products and not to the waste oil that is recycled and processed at this source. The waste oil is a volatile organic liquid and therefore, 40 CFR Part 60 Subpart Kb does apply. No change has been made as a result of this comment.

#### **Comment 12:**

Part 70 Quarterly Report

Since the facility wishes to retain the NOx CEMS for compliance monitoring, USS requests deletion of this form, which will no longer be applicable. The facility continues to utilize reporting guidance in accordance with 326 IAC 3-5-7 and 40 CFR 60.7(c).

#### **Response 12:**

The Part 70 Quarterly Report has been deleted. The form is no longer needed because USS-Midwest Plant has requested to retain the original permit conditions requiring CEMS instead of limiting fuel usage at the No. 3 Galvanizing Line.

#### **Comment 13:**

USS requested several changes be made to the Technical Support Document (TSD), which reflect the changes requested for the Part 70 Operating Permit.

#### **Response 13:**

IDEM prefers the Technical Support Document (TSD) to remain unchanged, therefore documenting the reasoning behind the permit conditions as public noticed. This TSD addendum points out and explains the reasoning for any changes to the permit after public notice. This method provides documentation for each step in the permit process.

## Indiana Department of Environmental Management Office of Air Quality

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

#### Source Background and Description

<b>Source Name:</b>	US Steel-Midwest Plant
<b>Source Location:</b>	U.S. Highway 12, Portage, Indiana 46368
<b>County:</b>	Porter
<b>SIC Code:</b>	3316
<b>Operation Permit No.:</b>	T127-7403-00009
<b>Permit Reviewer:</b>	Teresa Freeman

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from US Steel-Midwest Plant relating to the operation of a stationary steel finishing facility.

#### Source Definition

The following is the evaluation if US Steel-Midwest Plant is one source or not with the on-site contractor:

- (a) US Steel-Midwest Plant, the primary operation, is located at U.S. Highway 12, Portage, Indiana 46368; and
- (b) American Iron Oxide Company (AMROX), the on-site contractor (an acid regeneration facility) is located at U.S. Highway 12, Portage, Indiana 46368.
- (c) Portside Energy, the on-site contractor (a Cogeneration facility), is located at U.S. Highway 12, Portage, Indiana 46368
- (d) Oil Technology, Inc, the on-site contractor (a used oil recycling facility), is located at U.S. Highway 12, Portage, Indiana 46368

IDEM has determined that US Steel-Midwest Plant and American Iron Oxide Company are not under the common control of US Steel-Midwest Plant and have different SIC. US Steel-Midwest Plant provides less than 50% of AMROX's capacity for spent pickle liquor recycling, purchases no iron oxide and receives less than 50% of the regenerated HCl from AMROX. These two plants are considered separate major sources. Therefore, the term "source" in the Part 70 documents refers to US Steel-Midwest Plant. American Iron Oxide Company will obtain their own Part 70 permit (T127-14756-00085).

IDEM has determined that US Steel-Midwest Plant and Portside Energy Company are not under the common control of US Steel-Midwest Plant and have different SIC. These two plants are considered separate major sources. Therefore, the term "source" in the Part 70 documents refers to US Steel-Midwest Plant. Portside Energy will obtain their own Part 70 permit (127-10138-00067).

IDEM has determined that US Steel-Midwest Plant and Oil Technology, Inc. are under the common control of US Steel-Midwest Plant. These two plants are considered one source due to contractual control. Therefore, the term **source** in the Part 70 documents refers to both US Steel-Midwest Plant and Oil Technology, Inc. as one source. One combined Part 70 permit will be issued to US Steel-Midwest Plant and Oil Technology, Inc.

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

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

- (a) No. 1 Galvanizing Line (Also known as 48" galvanizing line) (Installed in 1960), with a capacity rate of 28.5 net tons of steel produced per hour and 50.3 MMBtu/hr heat input, consisting of the following:**
- (1) Pre-melt kettle fired by natural gas exhausting through roof monitor
  - (2) Alkaline Electrolytic Cleaning Section (I020) with a fume washer and exhausting out stack S008
  - (3) Annealing Furnace Section (U005) fired by natural gas and exhausting out stack S023
  - (4) Hot Dip Galvanize Coating Section
  - (5) Chemical Treatment Section
  - (6) Post Anneal Furnace fired with natural gas and exhausting through stack S023a
  - (7) Roll Rig fired by natural gas exhausting through roof monitor
- (b) No. 2 Galvanizing Line (Also known as 72" galvanizing line) (Installed in 1970 and modified 1997), with a capacity rate of 51.4 net tons per hour of steel, consisting of the following :**
- (1) Pre-melt kettle fired by natural gas and exhausting through roof monitor
  - (2) Alkaline Electrolytic Cleaning Section consisting of an electrolytic cleaning tank, a scrubber tank and a hot water rinse tank (U006a) with a fume washer (C006) and exhausting out stack S009
  - (3) Annealing Furnace Section (U006b)
    - (A) 149 natural gas burners, each with a rated capacity of 0.375 MMBtu per hour in furnace zones 1-5, exhausting through stack S-20
    - (B) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 6-9 and exhaust out stack S-20
    - (C) sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 10-13 and exhaust out stack S-20a
  - (4) Hot Dip Galvanize Coating Section
  - (5) Chemical Treatment Section

- (6) Two (2) strip dryers, #1 and #2 with a rated capacity of 3.0 MMBtu per hour each fired by natural gas
  - (7) One (1) roll rig with a rated capacity of 3.0 MMBtu per hour fired by natural gas and exhausting through a roof monitor
  - (8) Drying oven fired by natural gas and rated at 7.8 MMBtu per hour exhausting through roof monitor
- (c) **Continuous Anneal Line (installed in 1961), with a capacity rate of 46.2 net tons per hour and 77.8 MMBtu/hr, consisting of the following:**
- (1) Alkaline Electrolytic Cleaning Section (I017) with a fume washer and exhausting out stack S004
  - (2) Annealing Furnace (U007) fired by natural gas and exhausting through a roof vent
  - (3) Two (2) 1.0 MMBtu per hour natural gas-fired strip dryers
- (d) **Batch Annealing Furnaces (Installed in 1961), with a total capacity rate of 125.6 tons of steel coils per hour and 149 MMBtu/hr heat input, consisting of the following:**
- Twenty (20) Multi stack Batch Annealing Furnaces with fifty (50) Multi stack bases (U008), fired by natural gas and exhausting through three (3) wall-mounted building vents
- (e) **Pickle Line (Installed in 1961), with a capacity rate of 165.5 tons per hour of steel and line speed of 1200 fpm, consisting of the following:**
- (1) Four (4) Acid pickling tubs and one (1) rinse tub, (U010), with emissions controlled by a packed-bed scrubber at a design capacity of 58,000 cfm, designated as control device (C010), with emissions exhausting through stack S012
  - (2) One (1) 30,000 gallon spent pickle liquor (SPL) tank, with emissions controlled by a packed-bed scrubber, designated as control device (C010), with emission exhausting through stack S012
  - (3) Four (4) 10,000 gallon offline pickle solution storage tanks with uncontrolled fugitive emissions exhausting through vent F020
- (f) **80" Cold Reduction Mill (Tandem Mill) (Installed in 1970), with a capacity rate of 131.3 net tons steel per hour, consisting of the following:**
- 80" Tandem Mill (U011) with four (4) Oil mist eliminators (C011), exhausting through roof vents S010a and S010b
- (g) **52" Cold Reduction Mill (Tandem Mill) (Installed in 1961), with a capacity rate of 73.6 net tons of steel per hour, consisting of the following:**
- 52" Tandem Mill (U012) with two (2) Oil mist eliminators (C012), exhausting through stack U011a and stack U011b
- (h) **No. 3 Galvanizing Line (Installed in 1998), with a capacity rate of 50 net tons of steel per hour, consisting of the following:**

- (1) Water, Alkaline and Brush Cleaning Section (U015a), consisting of a water cleaning section with steam fired heater, an alkali cleaning section with steam fired heater and a brush cleaning and rinse section with steam fired heater with a common fume scrubber (C026) and out stack S026
  - (2) Direct-fire Furnace Section (U015b), consisting of a furnace with a direct fired section containing a 50 MMBtu per hour natural gas-fired burner with emissions controlled by Selective Non-Catalytic NOx Reduction providing seventy-six percent (76%) reduction (C025) and out stack S025
  - (3) Radiant Tube Anneal Section (U015c), consisting of a radiant tube heat section with a 10 MMBtu per hour natural gas-fired burner, and a radiant tube soak section with a 4 MMBtu per hour natural gas-fired burner exhausting through roof monitor (M015)
  - (4) Hot Dip Galvanize Coating Section and Chemical Treatment, consisting of a galvanizing coating section and a chemical treatment section
  - (5) Two (2) strip dryers: Strip #1 with a 1.85 MMBtu per hour natural gas-fired burner and Strip #2 with 2.5 MMBtu per hour natural gas-fired burner exhausting through roof monitor
  - (6) Temper mill leveling section with water wash
  - (7) Oil coating section
  - (8) One (1) roll rig
  - (9) Two (2) roll coaters placed in series, identified as RC-1 and RC-2, with maximum acrylic application rate of 130 pounds per hour
  - (10) One (1) electric curing oven, identified as CO-1
  - (11) One (1) cooling unit
- (i) **Electrolytic Cleaning Line (Installed in 1963), with a capacity rate of 43.4 net tons of steel per hour, consisting of the following:**
- Alkaline Electrolytic Cleaning Tubs (U021) with a fume washer (C021) and exhausting out stack S006
- (j) **Chrome Electroplate line (Installed in 1972), with a capacity rate of 31.4 net tons of steel per hour, consisting of the following:**
- (1) Alkaline Electrolytic Cleaning Section (I018) with a fume washer and exhausting out stack S001
  - (2) Acid Cleaning Section (U014) with a fume washer (C014) and exhausting out stack S001
  - (3) Electroplating Section with Rinse and Chemical Treatment Tanks (I007) with a fume washer and exhausting out stack S001
- (k) **Temper Mills with a capacity rate of 125.6 net tons of steel per hour at the Sheet Temper Mill (installed 1961), a capacity of 39.4 net tons of steel per hour at the No.**

**1 Tin Temper Mill (installed 1961) and a capacity of 70.8 net tons of steel per hour at the No. 2 Tin Temper Mill (installed 1972), consisting of the following:**

- (1) Sheet Temper Mill (I008) with an oil mist eliminator and exhausting through stack S027
- (2) No. 1 Tin Temper Mill (Tin Plate) (I001) exhausting through roof monitor
- (3) No. 2 Tin Temper Mill (Tin Plate) (I002) exhausting through roof monitor

**(l) Tin Electroplate Line (Installed 1972), with a capacity rate of 38.2 net tons of steel per hour, consisting of the following:**

- (1) Alkaline Cleaning Section (I003) with a fume washer exhausting through stack S002
- (2) Acid Cleaning Section (I004) with a fume washer exhausting through stack S002
- (3) Electroplating Section with rinse (I005) exhausting through fume scrubber and out stack S003
- (4) Chemical Treatment Section (I006) with a fume washer exhausting through stack S003
- (5) Two (2) Tin Cast Shop Melt Furnaces (0.5 MMBtu/hr each) fired by natural gas and exhausting out stack S028

**(m) Oil recovery facility (Oil Tech) (I024)(insignificant activity)**

- (1) Two (2) process oil tanks (T-1 and T-2) with a capacity of 18,000 gallons each
- (2) One (1) final product oil storage tank (T-3) with a capacity of 20,000 gallons

**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) Space heaters, process heaters, or boilers using the following fuels:
  - (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (2) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
  - (3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.
- (b) Combustion source flame safety purging on startup.

- (c) 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.
- (d) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Refractory storage not requiring air pollution control equipment.
- (g) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining I interface.
- (i) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (j) Cleaners and solvents characterized as follows:
  - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (l) Closed loop heating and cooling systems.
- (m) Rolling oil recovery systems.
- (n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (o) Activities associated with the transportation and treatment of sanitary sewage, provided site sewage treatment facility.
- (p) Quenching operations used with heat treating processes.
- (q) Heat exchanger cleaning and repair.
- (r) Paved and unpaved roads and parking lots with public access.

- (s) Asbestos abatement projects regulated by 326 IAC 14-10.
- (t) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Emergency generators as follows:
  - (1) Diesel generators not exceeding 1600 horsepower.
- (y) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including:
  - (1) Wheelabrator roll shot blast No.1 (I009) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S005
  - (2) Wheelabrator roll shot blast No.1 (I010) with a baghouse, having a maximum flow rate of 4000 acfm and grain loading of 0.015 gr/acf, exhausting through stack S007
- (z) Purge double block and bleed valves.
- (aa) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (bb) Other activities of categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only

Lead (Pb) = 0.6ton/year or 3.29 lbs/day	Carbon Monoxide (CO) = 25 lbs/day
Sulfur Dioxide (SO <sub>2</sub> ) = 5 lbs/hour or 25 lbs/day	Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NO <sub>x</sub> ) = 5 lbs/hour or 25 lbs/day	Volatile Organic Compounds = 3 lbs/hour or 15 lbs/day

  - (1) Lime hopper (I012)
  - (2) Combination Line: Alkaline Cleaning Section (I019)
  - (3) Tin Line: 6,000 gallon HCl tank
  - (4) Two (2) Equalization basins (I023)
  - (5) Hazardous waste landfill (U022)

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 64-09-89-0189, issued on September 11, 1985
- (b) OP 64-09-89-0190, issued on September 11, 1985
- (c) OP 64-09-89-0191, issue on September 11, 1985
- (d) CP 127-4243 (Registered Construction and Operation Status), issued on January 6, 1995
- (e) CP 127-4814, issued on February 12, 1996
- (f) CP 127-6706, issued on November 19, 1996
- (g) CP 127-8136, issued on July 30, 1997
- (h) A 127-8296, an amendment to CP127-6707, issued on March 24, 1997
- (i) A 127-8889, an amendment to CP 127-6706, issued on December 8, 1997
- (j) CP 127-10053 (Exempt Construction and Operation Status), issued on September 3, 1998
- (k) E 127-12049 (Exempt Construction and Operation Status), issued on May 10, 2000

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

- (a) OP 64-09-89-0189, issued on September 11, 1985

Condition: Entire Permit

Reason not incorporated: All requirements from OP 64-09-89-0189, issued on September 11, 1985, are not applicable because IDEM, OAQ has determined that the four (4) permitted natural gas/#6 fuel oil fired boilers (ID nos. 1-4) have been permanently removed and replaced by the Portside Energy Project (CP127-5260-00067, issued on May 14, 1996).

- (b) OP 64-09-89-0190, issued on September 11, 1985

Condition: Entire Permit

Reason not incorporated: All requirements from OP 64-09-89-0190, issued on September 11, 1985, are not applicable because IDEM, OAQ has determined that all of the permitted petroleum storage facilities have all been removed from the source.

- (c) Registered Construction and Operation Status, CP 127-4243-00009, issued on January 6, 1995

Condition: Entire permit

Reason not incorporated: All requirements from Registered Construction and Operation Status, CP 127-4243-00009, issued on January 6, 1995, are not applicable because IDEM, OAQ has determined that the permit was for a temporary replacement boiler (ID# 0-2556) and the boiler has been removed from the source.

- (d) Registered Construction and Operation Status, CP 127-8136-00009, issued on July 30, 1997

Condition: Entire permit

Reason not incorporated: All requirements from Registered Construction and Operation Status, CP 127-8136-00009, issued on July 30, 1997, are not applicable because IDEM, OAQ has determined that the two (2) natural gas-fired boilers (ID# TB5A and TB5B) were removed after the Portside Energy Project (CP 127-5260, issued on May 14, 1996) went online.

- (e) CP 127-4814-00009 issued on February 12, 1996

Condition: Condition #9-That the nitrogen oxide emissions from the Selective Non-Catalytic NOx Reduction unit shall not exceed 3.24 lb/hr and Condition #10-that a continuous emission monitor (CEM) system for NOx shall be installed and operated in accordance with 326 IAC 3-1 to ensure compliance with operation condition 9. Records shall be maintained at the source for a minimum period of two (2) years and be made available upon request of the Office of Air Management (OAM). The company shall document the cause of the out of range reading and take immediate action to correct any problem. Failure or partial failure of control devices shall be reported to IDEM according to the procedure specified for malfunctions in 326 IAC 1-6-2, in which case the provisions of 326 IAC 1-6-5 may apply at the discretion of IDEM.

Reason not incorporated: The source requested on November 20, 2002 to remove the CEMS requirement for the No. 3 Galvanizing Line. The use of CEMs for the No. 3 Galvanizing Line was required to ensure the operation of SCR to control NOx emissions below the applicability threshold of major NSR under 326 IAC 2-2. In the past, the Permittee faced technical difficulties with operation of CEMs and SCR because the galvanizing line did not always operate on high enough load on a continuous basis to effectively control NOx emissions. In lieu of SCR and CEMS, the Permittee agreed to accept a limit for natural gas usage and report it on a quarterly basis. IDEM structured the natural gas usage limitation in a manner to limit the NOx emissions below applicability threshold of major NSR under 326 IAC 2-2. The new condition is as follows:

Only natural gas shall be fired in the combustion units at the No. 3 Galvanizing line: Direct-fire Furnace Section (UO15b) and the Radiant Tube Anneal Section (U015c). NOx emissions for the NO. 3 Galvanizing Line shall not exceed two hundred seventy (270) pounds per million cubic feet of natural gas burned and 285 million cubic feet per twelve (12) month period with compliance demonstrated at the end of each month.

The natural gas usage limit is the equivalent to 38.5 tons per year of NOx, which is less than 40 tons per year, the applicability threshold for major NSR under 326 IAC 2-2.

IDEM has added a requirement to conduct a compliance verification stack test to verify emission factor used for establishing this limit.

- (f) CP 127-4814, issued on February 12, 1996

Condition: Condition #\*, the Selective Non-Catalytic NOx Reduction unit shall be operated at all times that the direct fire section of the furnace is operated.

Reason not incorporated: Condition is not necessary, since natural gas usage was limited to the No. 3 Galvanizing Line.

## 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 9, 1996. Additional information was received on February 2, 2001.

A notice of completeness letter was mailed to the source on February 6, 1997.

**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 100
PM-10	greater than 100
SO <sub>2</sub>	greater than 100
VOC	greater than 25 and less than 100
CO	greater than 100
NO <sub>x</sub>	greater than 100

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

HAPs	Potential To Emit (tons/year)
HCl	greater than 10
Chromium	less than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, SO<sub>2</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 and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 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 the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	23.43
PM-10	19.96
SO <sub>2</sub>	0.55
VOC	5.03
CO	76.75
NO <sub>x</sub>	124.59
Combined HAP (HCl/Chromium)	less than 10

**Limited Potential to Emit**

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

Process/facility	Limited Potential to Emit						
	PM*	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
No.1 Galvanizing line	38.7 lb/hr	B	B	B	B	B	--
No. 2 Galvanizing line Stack S-20 and Stack S-20a	<25tpy	<15 tpy	<40 tpy	<40 tpy	<100 tpy	0.512 lbs/ MMBtu/hr and 0.388 lbs/ MMBtu**	--
Continuous Annealing line	43.8 lb/hr	B	B	B	B	B	--
Batch Annealing line	53.6 lb/hr	--	B	B	B	B	--
Pickle line	56.5 lb/hr	B	B	B	B	B	<18 ppmv
80" Cold Reduction Mill	54.0 lb/hr	B	B	B	B	B	B
52" Cold Reduction Mill	48.2 lb/hr	B	B	B	B	B	--
No. 3 Galvanizing line	<25tpy	<15 tpy	<40 tpy	<40 tpy	<100 tpy	38.5***	B
Electrolytic Cleaning Line	43.3 lb/hr	--	B	B	B	B	B
Chrome Electroplate line	40.4 lb/hr	--	--	B	B	B	B

No. 1 Tin Temper Mill	42.4 lb/hr	B	B	B	B	B	B
No. 2 Tin Temper Mill	47.9 lb/hr	--	B	B	B	B	B
Sheet Temper Mill	53.6 lb/hr	--	B	B	B	B	B
Tin Electroplate Line	42.1 lb/hr	B	B	B	B	B	B

\*All PM limited PTE is based on 326 IAC 6-3-2 allowables.

\*\*No. 2 Galvanizing line NOx limit from CP 127-6706

\*\*\*No. 3 Galvanizing line NOx limit based on limited natural gas usage

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM10	unclassifiable
SO <sub>2</sub>	unclassifiable
NO <sub>2</sub>	attainment
Ozone	severe nonattainment
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. Porter County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Porter County has been classified as attainment or unclassifiable for PM10, SO<sub>2</sub>, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (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) This source is not subject to the New Source Performance Standard 40 CFR Part 60, Subpart Dc because all boilers at the source are less than 10 MMBtu/hr.
- (b) The final product oil storage tank (T-3) is subject to 40 CFR Part 60, Subpart Kb because the maximum capacity of the tank is greater than 40 m<sup>3</sup> and is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984. Pursuant to this rule, the Permittee must maintain records as required by 40 CFR 60.116b(a) and 60.116b(b).
- (c) The final product oil storage tank (T-3) is exempt from the General Provisions (Part 60, Subpart A) and from the provisions of subpart Kb, except as specified in 40 CFR 60.116b(a) and 60.116b(b), because the tank has a capacity less than 75 m<sup>3</sup> storing liquid.
- (d) 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 Part 60.461.
- (e) This source is not subject to the New Source Performance Standard 40 CFR Part 60, Subpart WWW (Municipal Solid Waste Landfills) because the landfill (U022) on site at the source is not a municipal solid waste landfill.
- (f) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart NB Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The USEPA determined in a letter dated April 11, 1996 from George Czerniak to Kevin Doyle of National Steel that 40 CFR Part 63, Subpart N does not apply to continuous chrome plating of steel at this time, because it is uniquely different than the categories identified in 40 CFR Part 63, Subpart N. However, the NESHAP may be amended in the future to include the continuous chromium electroplating of steel.
- (g) This source is subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart CCC-Steel Pickling Facilities.
  - (1) Pursuant to 40 CFR Part 63, Subpart CCC, the pickle line shall comply with the following requirements:
    - (2) The Permittee shall not cause or allow to be discharged into the atmosphere from the affected pickling line:
      - (A) Any gases that contain HCl in a concentration in excess of 18 ppmv; or
      - (B) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.
  - (2) The Permittee shall comply with the operation and maintenance requirements of 40 CFR Part 63.6(e) (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1160, Subpart CCC, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the sources

Title V Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

- (A) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;
- (B) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;
- (C) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;
- (D) Require an inspection of each scrubber at intervals of no less than 3 months with;
  - (i) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;
  - (ii) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;
  - (iii) Repair or replacement of droplet eliminator elements as needed;
  - (iv) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and
  - (v) Adjustment of damper settings for consistency with the required air flow.
- (E) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.
- (F) The Permittee shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement.
- (G) The Permittee shall maintain a record of each inspection, including each item identified in (D) above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.
- (h) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

- (1) This rule requires the source to:
  - (A) Submit a Part 1 MACT Application by May 15, 2002; and
  - (B) Submit a Part 2 MACT Application within twenty-four (24) months after the Permittee submitted a Part 1 MACT Application.
- (2) The Permittee submitted a Part 1 MACT Application on May 15, 2002. Therefore, the Permittee is required to submit the Part 2 MACT Application on or before May 15, 2004. Note that on April 25, 2002, Earthjustice filed a lawsuit against the US EPA regarding the April 5, 2002 revisions to the rules implementing Section 112(j) of the Clean Air Act. In particular, Earthjustice is challenging the US EPA's 24-month period between the Part 1 and Part 2 MACT Application due dates. Therefore, the Part 2 MACT Application due date may be changed as a result of the suit. Based on a proposed settlement published in the August 26, 2002 *Federal Register*, it appears that US EPA intends to revise the rule so that the due date of the Part 2 MACT Application will be within twelve (12) months after the Permittee submitted the Part 1 MACT application.
- (3) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification, any of the following will occur:
  - (A) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or
  - (B) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or
  - (C) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

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

326 IAC 2-2 and 326 IAC 2-3 (Prevention of Significant Deterioration and Emission Offset)  
Pursuant to 326 IAC 2-2 and 326 IAC 2-3, this source is a major source.

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 (Porter County) of NOx and PM10. 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 Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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 Part 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.

#### 326 IAC 6-4 (Fugitive Dust Emission Limitations)

The source is subject to the requirements of 326 IAC 6-4 because this rule applies to all sources of fugitive dust. Pursuant to the applicability requirements (326 IAC 6-4-1), Fugitive dust means the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located. The source shall be considered in violation of this rule if any of the criteria presented in 326 IAC 6-4 are violated.

#### 326 IAC 7-1.1-1(Sulfur Dioxide Emission Limitations)

The source is subject to the requirements of 326 IAC 7-1.1-1 because they have facilities with the potential to emit twenty-five (25) tons per year, however there are no applicable limits for any facility, because they use only natural gas-fired equipment.

#### 326 IAC 8-3-1 (Organic Solvent Degreasing Operations)

The degreasing facilities are subject to the requirements of 8-3-1(b)(1)(a) because they were existing as of July 1, 1990, located in Porter County and are cold cleaner degreaser operations.

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

The degreasing facilities are not subject to the requirements of 326 IAC 8-3-2 (Organic Solvent Degreasing Operations) because they were existing source as of January 1, 1980 and the potential to emit of the source is less than 100 tons per year of VOC.

#### 326 IAC 8-7 (VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The source is not subject to this rule because the only applicable category (326 IAC 8-3) is exempt from the emission limit requirements of 8-7-3.

#### 326 IAC 8-8 (Municipal Solid Waste Landfills)

The source is not subject to this rule because the landfill (U022) is not a municipal solid waste landfill.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Tanks)

The source is not subject to this rule because the fluids stored in stationary vessels are not considered a volatile organic liquid (VOL) or 40 CFR Part 63, Subpart Kb is applicable and exempt from the applicability of 8-9.

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

The source 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 source 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.

## State Rule Applicability - Individual Facilities

### 326 IAC 2-2 and 326 IAC 2-3 (Prevention of Significant Deterioration and Emission Offset )

(a) Pursuant to 326 IAC 2-2, 326 IAC 2-3 and CP 127-6706, issued November 19, 1996, as amended by Amendment 127-8296 issued on March 24, 1997, the emissions of oxides of nitrogen (NOx) from No. 2 Galvanizing Line furnace exhausting through

(1) stack S-20 shall not exceed 0.512 lbs/MMBtu; and

(2) stack S-20a shall not exceed 0.388 lbs/ MMBtu.

(b) Pursuant to CP 127-6706 issued on November 19, 1996, Condition 11, the seventeen (17) burners rated at maximum heat input capacity of 1.0 MMBtu/hr and the seventeen (17) burners rated at a maximum heat input capacity of 0.55 MMBtu/hr be removed from the furnace zones 6-9 prior to installation and operation of the new burners at the No. 2 Galvanizing line annealing furnace section in furnace zones 6-9 and 10-13.

The old burners were removed. Sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 6-9 and sixty-nine (69) natural gas burners, each with a rated capacity of 0.75 MMBtu per hour in furnace zones 10-13 were installed as replacements. This satisfies the requirements of emission offset requirements (326 IAC 2-3).

(c) Pursuant to CP 127-6706 (modernization of the No. 2 Galvanizing line) issued November 19, 1996, condition 12, Boiler No. 1 used as an offset in CP127-5260 (Portside Energy Project) was required to be shutdown by April 30, 1997. This satisfies the requirements of emission offset requirements ( 326 IAC 2-3).

The boiler was removed.

(d) Pursuant to Amendment 127-8889 issued on December 8, 1997, the infrared drying oven at the No. 2 Galvanizing line shall only be fired by natural gas and shall have a maximum heat input rate of 7.8 MMBtu/hr. Therefore, the PSD and emission offset requirements (326 IAC 2-2 and 326 IAC 2-3) do not apply.

(e) Pursuant to CP 127-4814 issued on February 12, 1996, the nitrogen oxide emissions from the Direct-Fire furnace section controlled by a Selective Non-Catalytic NOx Reduction unit shall not exceed 3.24 lbs/hr. Therefore, the PSD and emission offset requirements (326 IAC 2-2 and 326 IAC 2-3) do not apply.

(f) PM/PM10, SO2, VOC and CO were below PSD/Offset significant levels for modernization of the No. 2 Galvanizing line in CP 127-6706, issued November 19, 1996.

(g) PM/PM10, SO2, VOC and CO were below PSD/Offset significant levels for construction of the No. 3 Galvanizing line in CP 127-4814, issued February 12, 1996.

- (h) Only natural gas shall be fired in the combustion units at the No. 3 Galvanizing line: Direct-fire Furnace Section (UO15b) and the Radiant Tube Anneal Section (U015c). NO<sub>x</sub> emissions for the NO. 3 Galvanizing Line shall not exceed two hundred seventy (270) pounds per million cubic feet of natural gas burned and 285 million cubic feet per twelve (12) month average.

The natural gas usage limit is the equivalent of 38.5 tpy of NO<sub>x</sub>, which is less than 40 tpy, the applicability threshold for major NSR under 326 IAC 2-2.

**326 IAC 6-3-2 (Process Operations)(No.1 Galvanizing line)**

Pursuant to 40 CFR 52 Subpart P, the PM from the No.1 Galvanizing line shall not exceed the pounds per hour emission rate established as  $E$  in the following equation:

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

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

At a process weight rate of 28.5 tons per hour for the No. 1 Galvanizing line, the allowable PM emission rate shall not exceed 38.7 pounds per hour.

**326 IAC 6-3-2 (Process Operations)(No. 2 Galvanizing Line)**

Pursuant to 40 CFR 52 Subpart P, the PM from the No. 2 Galvanizing Line shall not exceed the pounds per hour emission rate established as  $E$  in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 51.4 tons per hour for the No. 2 Galvanizing line, the allowable PM emission rate shall not exceed 44.8 pounds per hour.

**326 IAC 6-3-2 (Process Operations)(Continuous Anneal Line)**

Pursuant to 40 CFR 52 Subpart P, the PM from the Continuous Anneal Line shall not exceed the pounds per hour emission rate established as  $E$  in the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

At a process weight rate of 46.2 tons per hour for the Continuous Anneal Line, the allowable PM emission rate shall not exceed 43.8 pounds per hour.

**326 IAC 6-3-2 (Process Operations)(Batch Anneal)**

Pursuant to 40 CFR 52 Subpart P, the PM from the Batch Annealing Furnaces shall not exceed the pounds per hour emission rate established as  $E$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 125.6 tons per hour for the Batch Annealing Furnaces, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**Pickle Line**)

Pursuant to 40 CFR 52 Subpart P, the PM from the Pickle Line shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 165.5 tons per hour for the Pickle Line allowable PM emission rate shall not exceed 56.5 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**80" Tandem Mill and 52" Tandem Mill**)

Pursuant to 40 CFR 52 Subpart P, the PM from the 80" Tandem Mill and 52" Tandem Mill shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

(a) At a process weight rate of 131.3 tons per hour for the 80" Tandem Mill, the allowable PM emission rate shall not exceed 54.0 pounds per hour.

(b) At a process weight rate of 73.6 tons per hour for the 52" Tandem Mill, the allowable PM emission rate shall not exceed 48.2 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**No.3 Galvanizing Line**)

Pursuant to 40 CFR 52 Subpart P, the PM from the No.3 Galvanizing Line shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 50 tons per hour for the No.3 Galvanizing Line, the allowable PM emission rate shall not exceed 44.6 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**Electrolytic Cleaning Line**)

Pursuant to 40 CFR 52 Subpart P, the PM from the Electrolytic Cleaning Line shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 43.4 tons per hour for the Electrolytic Cleaning Line, the allowable PM emission rate shall not exceed 43.3 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**Chrome Electroplate line**)

Pursuant to 40 CFR 52 Subpart P, the PM from the Chrome Electroplate line shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 31.4 tons per hour for the Chrome Electroplate line, the allowable PM emission rate shall not exceed 40.4 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**Temper Mills**)

Pursuant to 40 CFR 52 Subpart P, the PM from the Temper Mills shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

- (a) At a process weight rate of 39.4 tons per hour for the No. 1 Tin Temper Mill, the allowable PM emission rate shall not exceed 42.4 pounds per hour.
- (b) At a process weight rate of 70.8 tons per hour for the No. 2 Tin Temper Mill, the allowable PM emission rate shall not exceed 47.9 pounds per hour.
- (c) At a process weight rate of 125.6 tons per hour for the Sheet Temper Mill, the allowable PM emission rate shall not exceed 53.6 pounds per hour.

326 IAC 6-3-2 (Process Operations)(**Tin Electroplate line**)

Pursuant to 40 CFR 52 Subpart P, the PM from the Tin Electroplate line shall not exceed the pounds per hour emission rate established as  $AE@$  in the following equation:

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

$E = 55.0 P^{0.11} - 40$  where  $E$  = rate of emission in pounds per hour; and  
 $P$  = process weight rate in tons per hour

At a process weight rate of 38.2 tons per hour for the Tin Electroplate line, the allowable PM emission rate shall not exceed 42.1 pounds per hour.

326 IAC 6-3-2 (Process Operations) **Insignificant Activities**

**-Machining**

**-Brazing equipment, cutting torches, soldering equipment, welding equipment**

**-Grinding and machining operations**  
**-Wheelabrator roll shot blast No. 1**  
**-Wheelabrator roll shot blast No. 2**  
**-Lime hopper (I012)**

Pursuant to 40 CFR 52 Subpart P, the PM from the above cited processes shall not exceed the pounds per hour emission rate established as  $E$  in the following equation:

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

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

$P = \text{process weight rate in tons per hour}$

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) **Insignificant Activities (degreasing)**

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaner degreaser facility shall ensure that the following 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ ));
  - (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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), 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 ( $38^{\circ}\text{C}$ ) (one hundred degrees Fahrenheit ( $100^{\circ}\text{F}$ )), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius ( $48.9^{\circ}\text{C}$ ) (one hundred twenty degrees Fahrenheit ( $120^{\circ}\text{F}$ )):
  - (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 of 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 Permittee of a cold cleaning facility shall ensure that the following 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 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 8-3-8 (Organic Solvent Degreasing Operations: material requirements for cold cleaning degreasers) Pursuant to 326 IAC 8-3-8 (Organic Solvent Degreasing Operations: material requirements for cold cleaning degreasers), on and after May 1, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit). All persons subject to the requirements of 326 IAC 8-3-8 (c)(2)(B) shall maintain each of the following records for each purchase:

- (a) The name and address of the solvent supplier.
- (b) The date of purchase.
- (c) The type of solvent.
- (d) The volume of each unit of solvent.
- (e) The total volume of the solvent.
- (f) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty -eight (68) degrees Fahrenheit).

All records required shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

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

The source 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:

#### 1. No. 2 Galvanizing Line

Within eighteen (18) months after issuance of this permit, the Permittee shall perform NO<sub>x</sub> testing on the Annealing Furnace Section (U006b) stacks S-20 and S-20a utilizing a testing method approved by the Commissioner in accordance with Section C - Performance Testing. This test shall be repeated at least once every five (5) years from the date of the last valid compliance

demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

## 2. Pickle Line

- (a) Within 6 months of permit issuance, the Permittee shall conduct an initial performance test for each affected process or control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart A, General Provisions). Pursuant to 40 CFR Part 63.1161, Subpart CCC, this initial performance test shall meet the following minimum requirements:
  - (1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device or measure the concentration of HCl in gases exiting the process or the emission control device.
  - (2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.
  - (3) Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.
- (b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR Part 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.
- (c) Performance tests shall be conducted either annually or according to an alternative schedule approved by IDEM, OAQ, but no less frequently than every two and half (2.5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.
- (d) Pursuant to 40 CFR Part 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR Part 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.

- (e) The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under condition D.5.2 and D.5.3, if required:
- (1) Method 1, to determine the number and location of sampling points, with the exception that no sampling traverse point shall be within one inch of the stack or duct wall;
  - (2) Method 2, to determine gas velocity and volumetric flow rate;
  - (3) Method 3, to determine the molecular weight of the stack gas;
  - (4) Method 4, to determine the moisture content of the stack gas; and
  - (5) Method 26A, A Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources B Isokinetic Method, to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:  $C_{HCl(ppmv)} = 0.659 C_{HCl(mg/dscm)}$ , where  $C_{(ppmv)}$  is concentration in ppmv and  $C_{(mg/dscm)}$  is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.
  - (6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

### 3. No. 3 Galvanizing Line

Within eighteen (18) months after issuance of this permit, the Permittee shall perform an initial compliance test of the No. 3 Galvanizing line: Direct-fire Furnace Section (UO15b) and the Radiant Tube Anneal Section (U015c) to demonstrate compliance with Condition D.7.2. 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 is as follows:

1. No. 1 Galvanizing Line  

There is no compliance monitoring required for the No. 1 Galvanizing Line. The fume washer on the alkaline electrolytic section is for OSHA requirements, and is not required to comply with applicable PM limitations. The cleaning process is not a significant source of PM emissions. The Annealing Furnace Section, Post Anneal Furnace and Roll Rig are fired by natural gas and are not a significant source of PM and SO<sub>2</sub> emissions. The Hot Dip Galvanize Coating Section is not a significant source of PM and the Chemical Treatment Section is covered with a lid. No VE notations required because natural gas only is used.
2. No. 2 Galvanizing Line  

There is no compliance monitoring required for the No. 2 Galvanizing Line. The fume washer on the alkaline electrolytic cleaning section is for OSHA requirements, and is not required to comply with applicable PM limitations. The cleaning section is not a significant source of PM emissions. The pre-melt kettle, Annealing Furnace Section, strip dryers, roll rig and drying oven are fired by natural gas and actual PM and SO<sub>2</sub> emissions are not a significant source of these pollutants. The Hot Dip Galvanize Coating Section is not a significant source of PM and the Chemical Treatment Section is covered with a lid. No VE notations required because natural gas only is used.
3. Continuous Anneal Line  

There is no compliance monitoring required for the Continuous Anneal Line. The fume washer on the alkaline electrolytic cleaning section is for OSHA requirements, and is not required to comply with applicable PM limitations. The Continuous Anneal Line is not a significant source of PM emissions. No VE notations required because natural gas only is used.
4. Batch Annealing Furnaces  

There is no compliance monitoring required for the Batch Annealing Furnaces. They are fired by natural gas and actual PM and SO<sub>2</sub> emissions are not a significant source of these pollutants. No VE notations required because natural gas only is used.
5. Pickle Line
  - (a) The Permittee of a new, reconstructed, or existing steel pickling facility shall:
    - (1) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR Part 63.1160(b)(2).
    - (2) Failure to record each of the operating parameters in (2) above is a violation of the monitoring requirements of 40 CFR Part 63, Subpart CCC.

- (3) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.
- (4) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.

6. 80" Cold Reduction Mill (Tandem Mill)

There is no compliance monitoring required for the 80" Cold Reduction Mill. The oil mist eliminators are for OSHA requirements, and are not air pollution control devices required to comply with applicable PM limitations. The actual PM and SO<sub>2</sub> emissions are not a significant source of these pollutants. The 80" Cold Reduction Mill have no applicable Article 8 rules for VOC because it was constructed prior to January 1, 1980.

7. 52" Cold Reduction Mill (Tandem Mill)

There is no compliance monitoring required for the 52" Cold Reduction Mill. The oil mist eliminators are for OSHA requirements, and are not air pollution control devices required to comply with applicable PM limitations. The actual PM and SO<sub>2</sub> emissions are not a significant source of these pollutants. The 52" Cold Reduction Mill have no applicable Article 8 rules for VOC because it was constructed prior to January 1, 1980.

8. No. 3 Galvanizing Line

- (a) Pursuant to CP 127-4814, issued on February 12, 1996, the pressure drop and flow rate of the scrubber shall be monitored at the beginning of each shift and readings recorded. When for any one reading, the pressure drop across the scrubber is outside the normal range of 4.9 - 10.9 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 reading that is outside the ranges is not a deviation from this permit.
- (b) Pursuant to CP 127-4814, issued on February 12, 1996, a continuous emission monitor (CEM) system for NO<sub>x</sub> shall be installed and operated in accordance with 326 IAC 3-5 to ensure compliance with conditions D.7.2 and D.7.5 of the permit.

For NO<sub>x</sub>, the Permittee shall install, calibrate, certify, operate and maintain a continuous emissions monitoring system for stack in accordance with 326 IAC 3-5-2 and 3-5-3.

- (1) The continuous emissions monitoring system (CEMS) shall measure NO<sub>x</sub> emissions rate in pounds per hour. The use of CEMS to measure and record the NO<sub>x</sub> hourly emission rates over a twenty-four (24) operating hour block averaging period is sufficient to demonstrate compliance with the limits established in the condition D.7.2. The source shall maintain records of emission rates in pounds per hour.
- (2) The Permittee shall submit to IDEM, OAQ, within ninety (90) days after monitor installation, a complete written continuous monitoring standard operating procedure (SOP), in accordance with the requirements of 326 IAC 3-5-4. (SOP submitted in November 1999)
- (3) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting,

pursuant to 326 IAC 3-5-7. The source shall also be required to maintain records of the amount of natural gas combusted per furnace on a monthly basis.

- (4) The source may submit to the OAQ alternative emission factors based on the source's CEMS data (collected over one (1) season of operation; where a season is defined as the period of time from May 1 through September 30) and the corresponding site temperatures, to use in lieu of the vendor provided emission factors in instances of downtime. The alternative emissions factors must be approved by the OAQ prior to use in calculating emissions for the limitations established in this permit. The alternative emission factors shall be based upon collected monitoring and test data supplied from an approved continuous emissions monitoring system. In the event that the information submitted does not contain sufficient data to establish appropriate emission factors, the source shall continue to collect data until appropriate emission factors can be established.

9. Electrolytic Cleaning Line

There is no compliance monitoring required for the Electrolytic Cleaning Line. The fume washer on the alkaline electrolytic cleaning section is for OSHA requirements, and is not required to comply with applicable PM limitations. The Electrolytic Cleaning Line is not a significant source of PM emissions.

10. Chrome Electroplate Line

There is no compliance monitoring required for the Chrome Electroplate Line. The fume washer on the alkaline electrolytic cleaning section, acid cleaning section and electroplating section are for OSHA requirements, and is not required to comply with applicable PM limitations. The Chrome Electroplate Line is not a significant source of PM emissions. The actual HAP emissions are less than 10 tpy.

11. Temper Mills

There is no compliance monitoring required for the Temper Mills. The Temper Mill process is not a significant source of PM emissions. The oil mist eliminators are for OSHA requirements, and are not air pollution control devices required to comply with applicable PM limitations.

12. Tin Electroplate Line

There is no compliance monitoring required for the Tin Electroplate Line. The fume washers on the alkaline cleaning section and the acid cleaning section are for OSHA purposes, and is not required to comply with applicable PM limitations. The fume scrubbers on the electroplating section and chemical treatment section are for OSHA purposes, and is not required to comply with applicable PM limitations. The Tin Electroplate Line is not a significant source of PM emissions.

13. Insignificant Activities

There is no compliance monitoring required for the insignificant activities. Compliance for the Degreasing Operation will be verified by record keeping requirements.

### **Conclusion**

The operation of this stationary steel finishing facility shall be subject to the conditions of the attached proposed Part 70 Permit No. T127-7403-00009.