INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: October 4, 2006

RE: Steel Dynamics, Inc. / 033-8068-00043

FROM: Nisha Sizemore
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:

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(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 impractible 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.

Enclosures
FNTVOP.dot 03/23/06

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Steel Dynamics, Inc.
4500 County Road 59
Butler, Indiana 46721

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T033-8068-00043	
Issued by:Origin signed by Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: October 4, 2006 Expiration Date:October 4, 2011

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Fugitive Dust Control Plan

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.2, 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 minimill.

Responsible Official:	Plant Manager or designee (pursuant to 326 IAC 2-7-1(34))
Source Address:	4500 County Rd 59, Butler, Indiana 46721
Mailing Address:	4500 County Rd 59, Butler, Indiana 46721
Phone Number:	260-868-8000
SIC Code:	3312
County Location:	DeKalb
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules 1 of 28 Source Categories Minor Source, Section 112 of the Clean Air Act

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

The source consists of:

(a) Steel Dynamics, Inc., located at 4500 County Road 59, Butler, Indiana 46721; and

(b) Iron Dynamics, Inc., located at 4500 County Road 59, Butler, Indiana 46721.

Separate Part 70 permits will be issued to Steel Dynamics, Inc. (033-8068-00043) and Iron Dynamics, Inc. (033-12614-00076), solely for administrative purposes. For this permit, the Permittee is Steel Dynamics, Inc., the primary operation.

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

Steel Dynamics, Inc. consists of the following emission units and pollution control devices:

Melt Shop Operations

(a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 South, constructed in 1995 and EAF #2 North, constructed in 1998), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation control (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control, and a baghouse (EAF baghouse) for particulate (PM/PM-10) emissions control, exhausting through the EAF Stack 01 equipped with a continuous opacity monitor (COM).

(b) Continuous Casters

Two (2) continuous casters (CC #1 South, constructed in 1995 and CC #2 North,

constructed in 1998), each with a nominal capacity of 225 tons per hour. Particulate matter (PM/PM10) emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

(1) One (1) ladle dryout station (LDS), with a nominal heat input of 10 MMBtu per hour.

(2) Four (4) ladles preheat stations (LPS), with a nominal heat input of 10 MMBtu per hour each.

(3) Three (3) tundish ladle dryers with a nominal heat input capacity of 1.5 MMBtu per hour each,

(4) Two (2) tundish preheaters with a nominal heat input capacity of 9.4 MMBtu per hour each; and

(5) Lancing and cutting of skulls, coils and steel scrap.

(d) Storage Silos and Bins

(1) Ten (10) storage silos including the following:

(A) Two (2) EAF dust silos consisting of:

(i) Bin vent 5a for particulate matter control constructed in 1995, and

(ii) Bin vent 5b for particulate matter control constructed in 1998.

(B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control, and

(C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control.

(2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.

(e) Slag pit digouts associated with each electric arc furnace.

(f) Melt shop building openings, dust handling system and melt shop roof monitors.

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (South constructed in 1995 and North constructed in 1998), each with a nominal capacity of 200 tons per hour. Particulate (PM/PM10) emissions are controlled by the Ladle Metallurgical Facility (LMF) baghouse (constructed in 1998) exhausting through Stack 61. The LMS consists of the following:

(a) Three (3) Ladle Metallurgical furnaces (LMF), and

(b) Two (2) stir stations,

Hot Mill Operations - Tunnel Furnaces

(a) One (1) tunnel furnace, No. 1 South, constructed in 1995, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through

Stack 2.

(b) One (1) tunnel furnace, No. 2 North, constructed in 1998, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through Stack 42.

Cold Mill Operations – Pickling Line

One (1) pickling line, with a nominal capacity of 1.4 million ton per year, constructed in 1997, with a packed scrubber and covered tanks maintained under negative pressure, for Hydrochloric Acid (HCl) control, and a mist eliminator for PM/PM-10 control, exhausting to Stack 17.

Pickle Line Scale Breaker

One (1) scale breaker, constructed in 1997, with a nominal capacity of 1.4 million tons per year that removes scale from the rolled steel prior to the pickling process. Particulate (PM/PM10) emissions are controlled by a baghouse exhausting to Stack 60.

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, constructed in 1997, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour and the CP 033-5625-00043, issued August 8, 1996, permitted the heat input per hour for Boilers Nos. 1 and 2 as 11.8 MMBtu per hour each. Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any time.

Reversing Mill

One (1) cold reversing mill, with a nominal capacity of one (1.0) million tons per year, constructed in 1997, with a mist eliminator for particulate (PM/PM10) emissions control, exhausting to Stack 18.

Galvanizing Lines

(a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel per year, constructed in 1997, heated by a low NOx burner natural gas fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through Stack 19.

(b) Twenty-four (24), natural gas fired radiant tube heaters, added to the hot band galvanizing line in 2002. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.

(c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel per year, constructed in 1997, heated by a low NOx burner natural gas fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

Annealing Furnaces

Sixteen (16) low NOx burners, natural gas fired annealing furnaces and forty (40) annealing bases, constructed in 1997. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31 and 32.

Paint Line (Coil Coating Line)

(a) One (1) 2-side, 2-coat coil coating line, constructed in 2003, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled steel, using a 60 MMBtu per hour heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.

(b) Two (2) curing ovens, constructed in 2003, with a combined nominal heat input capacity of 16 MMBtu per hour using a 60 MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to Stack 78.

Slag Handling Operation

The following slag handling operations are owned and operated by Edward C. Levy Company - Butler Mill Service.

(a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, constructed in 1995;

(b) One (1) 36" conveyor (#9), with a nominal capacity of 350 tons per hour, constructed in 1995;

(c) One (1) 30" conveyor (#7), with a nominal capacity of 350 tons per hour, constructed in 1995;

(d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, constructed in 1995;

(e) One (1) 24" conveyor (#6), with a nominal capacity of 100 tons per hour, constructed in 1995;

(f) One (1) 30" conveyor (#5), with a nominal capacity of 250 tons per hour, constructed in 1995;

(g) Three (3) 6' by 16' Screens, each with a nominal capacity of 250 tons per hour, constructed in 1995;

(h) One (1) 48" Conveyor (#1), with a nominal capacity of 75 tons per hour, constructed in 1995;

(i) One (1) 24" Stacker (#1), with a nominal capacity of 75 tons per hour, constructed in 1995;

(j) One (1) 24" Stacker (#2), with a nominal capacity of 125 tons per hour, constructed in 1995;

(k) One (1) 24" Conveyor (#12); with a nominal capacity of 40 tons per hour, constructed in 1995;

(l) One (1) 24" Stacker (#4), with a nominal capacity of 50 tons per hour, constructed in 1995;

(m) One (1) 4 ¼ Standard Crusher, with a nominal capacity of 50 tons per hour, constructed in 1995;

(n) One (1) 30" Conveyor (#8), with a nominal capacity of 25 tons per hour; constructed in 1995;

(o) Two (2) 30" Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, constructed in 2003;

(p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, constructed in 2003, and

(q) Aggregate Storage Piles.

Fugitive emissions from the slag handling operations are controlled as needed by water sprays.

Fugitive Dust Sources

(a) Paved roads,

(b) Parking areas,

(c) Unpaved roads, and

(d) Traveled open areas.

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

Steel Dynamics, Inc. also includes the following insignificant activities:

1. Specifically regulated insignificant activities, which are specifically regulated as defined in 326 IAC 2-7-1(21):
   (a) Temper Mill [326 IAC 6-3-2]
   (b) 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]

2. Other Insignificant Activities
   (a) Space heaters, process heaters, or boilers using the following fuels:
      (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
      (ii) 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.
   (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
   (c) Combustion source flame safety purging on startup.
   (d) Fuel dispensing activities, including the following:
      (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
      (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. 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:
      (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
      (ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
   (f) Refractory storage not requiring air pollution control equipment.
   (g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.
   (h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.
(j) Closed loop heating and cooling systems.
(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
(l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.
(m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.
(n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
(o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
(q) Heat exchanger cleaning and repair.
(r) Process vessel degassing and cleaning to prepare for internal repairs.
(s) Covered conveyors for solid raw material, including the following:
  (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.
  (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
(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) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
(w) Activities associated with emergencies, including the following:
  (i) On-site fire training approved by the department.
  (ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
  (iii) Stationary fire pump engines.
(x) A laboratory as defined in 326 IAC 2-7-1(21)(D)
(y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F).

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); and

(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] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, T033-8068-00043, 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 of this permit

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

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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, and the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(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 or its equivalent, with each submittal requiring certification. One certification may cover multiple forms in one (1) submittal.

(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 no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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) no later than 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
Indianapolis, Indiana 46204-2251

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

(b) 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, 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).

(c) 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 except as provided in this condition.

(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, 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

(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
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4)(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 compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

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

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

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

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

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

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior to T033-8068-00043 and issued

pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 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.15 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.11 - 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
Indianapolis, Indiana 46204-2251

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 do 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.16 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.17 Permit Renewal [326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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
Indianapolis, Indiana 46204-2251

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 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.

B.18 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
Indianapolis, Indiana 46204-2251

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)]

B.19 Permit Revision under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b) (2)]

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

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

B.20 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 limitations provided in 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
Indianapolis, Indiana 46204-2251

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM,

OAQ, in the notices specified in 326 IAC 2-7-20(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 emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC13-30-3-1] [IC13-17-3-2]

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 and the 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.23 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 permit revision that allows for 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
Indianapolis, Indiana 46204-2251

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.24 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. In the event that the source is a sub-contractor and is combined with a larger Part 70 source, the larger Part 70 source may pay the Permittees' annual fees as part of the larger source billing and subject to the fee cap of the larger source. If, however, the larger Part 70 does not pay its annual Part permit fee, IDEM, OAQ will assess a separate fee in accordance with 326 IAC 2-7-19(c) to be paid by the Permittee. 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), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 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.

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

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on October 7, 1994 (see Attachment A).

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 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]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require 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, no 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 no later than five (5) days prior to the end of the initial forty-five (45) day period. The notification submitted by the Permittee does not require certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

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 no later than ninety (90) days after 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 no later than 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
Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require 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 units(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] ***)***

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 21, 1998.

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

C.15 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.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

C.17 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.9 - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, no later than thirty (30) days after receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed no later than one hundred twenty (120) days after submission to IDEM, OAQ 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 not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6][326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-2]

C.18 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit no later than July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purposes of 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
Indianapolis, Indiana 46204-2251

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

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

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

(a) Records of all required monitoring data 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 no later than ninety (90) days after permit issuance.

(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
  - (i) Baseline actual emissions;
  - (ii) Projected actual emissions;
  - (iii) Amount of emissions excluded under section

326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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 no later than thirty (30) days after 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
Indianapolis, Indiana 46204-2251

(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 no later than thirty (30) days of the end of the reporting period. All reports that require the certification shall be signed 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C.19 - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Alternative Operating Scenario

C.22 Alternative Operating Scenario

The Permittee may use propane gas as an alternative fuel for natural gas during emergency situations.

SECTION D.1 FACILITY OPERATION CONDITIONS (MELT SHOP)

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

Melt Shop Operations

(a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 South, constructed in 1995 and EAF #2 North, constructed in 1998), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation control (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of a canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control, and a baghouse (EAF baghouse) for particulate (PM/PM-10) emissions control, exhausting through EAF Stack 01 equipped with a continuous opacity monitor (COM).

(b) Continuous Casters

Two (2) continuous casters (CC #1 South, constructed in 1995 and CC #2 North, constructed in 1998), each with a capacity of 225 tons per hour. Particulate (PM/PM10) emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

(1) One (1) ladle dryout station (LDS), with a heat input of 10 MMBtu per hour.
(2) Four (4) ladle preheat stations (LPS), with a heat input of 10 MMBtu per hour each.
(3) Three (3) tundish dryers with heat input capacity of 1.5 MMBtu per hour each,
(4) Two (2) tundish ladle preheaters with a heat input capacity of 9.4 MMBtu per hour each, and
(5) Lancing and cutting of skulls, coils and steel scrap.

(d) Storage Silos and Bins

(1) Ten (10) outside storage silos including the following:
  (A) Two (2) EAF dust silo including
    (i) A bin vent 5a for particulate matter control, constructed in 1995, and
    (ii) A bin vent 5b for particulate matter control, constructed in 1998.
  (B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control, and
  (C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control.
(2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.

(e) Slag pit dig outs associated with each electric arc furnace.

(f) Melt Shop building openings, dust handling system and Melt Shop roof monitors

(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) Limitations [40 CFR Part 60, Subpart AAa]

Pursuant to 40 CFR 60, Subpart AAa (Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarbonization Vessels Constructed After August 7, 1983), particulate matter emissions from the EAF baghouse shall not exceed 0.0052 grains per dry standard cubic feet.

D.1.2 Particulate (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the EAFs 1 and 2, PM/PM-10 emissions shall be controlled by a direct shell evacuation system and canopy hood with 100 percent overall capture exhausted to a baghouse with 99.85 control efficiency, at an air flow rate of 1.3 million dscfm, discharging through a Stack 01 at a height of 125 feet above the ground. A slight negative pressure shall be maintained to draw particulate matter through the DSE duct.

(b) Pursuant to CP 033-8091-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the EAF baghouse Stack 01 shall not exceed 0.0032 grains per dry standard cubic feet at an air flow rate of 1.3 million dscfm (1.62 million acfm) and a maximum PM/PM-10 emissions of 35.7 pounds per hour.

(c) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the continuous casters shall be controlled by canopy hoods and exhausted to the EAF baghouse to Stack 01.

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD Control Technology Review; Requirements), the Permittee shall do the following as needed:

(1) Mechanically reduce skulls, coils and steel scrap in size.

(2) Transport any skulls, coils and steel scrap not mechanically reduced in size to the steel works building and oxygen lance/cut under a furnace canopy using the baghouse to control emissions.

D.1.3 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the NO_x emissions from the EAFs using low-NOx natural gas fired burners shall not exceed 0.51 pounds per ton of steel produced. The total NOx emissions shall not exceed 204.0 pounds per hour.

(b) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, shall not exceed 10 MMBtu per hour heat input and NOx emissions shall not exceed 0.10 lbs/MMBtu.

(c) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the four (4) Ladle Preheat Stations (LPS) shall be limited solely to the use of low-NOx natural gas-fired burners. The four (4) horizontal preheater stations combined shall not exceed 40 MMBtu per hour heat input and the NOx emissions shall not exceed 0.14 lbs/MMBtu.

(d) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the three (3) Tundish dryers shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner shall be limited to 1.5 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the two (2) Tundish Preheaters shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner shall not exceed 9.4 MMBtu per hour heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.

D.1.4 Sulfur Dioxide (SO_2) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control

Technology Review; Requirements), the SO_2 emissions from the LMF Stack 61 and the existing EAFs Stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.20 pounds per ton of steel produced and 80 pounds of SO_2 per hour.

(b) Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO2 emissions from the EAFs shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke.

D.1.5 Carbon Monoxide (CO) Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD – Control Technology Review; Requirements), the CO emissions from EAFs shall be controlled by an adjustment gap between the EAF direct shell evacuation system (DSE) and the remaining water cooled duct to common baghouse. The CO emissions shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions shall not exceed 800 pounds per hour. A slight negative pressure shall be maintained at the gap to ensure further combustion of the CO.

D.1.6 Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), VOC emissions from EAFs shall be controlled through the extensive scrap management program attached to this permit. All grades of scrap shall be free of non-ferrous metals, non-metallic, excessive dirt, oil, grease, and tin plate. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the VOC emissions from the EAFs shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from the EAFs baghouse Stack 01 shall not exceed 52.0 pounds per hour.

D.1.7 VOC General Reduction Requirements (BACT): New Facilities [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the EAFs Best Available Control Technology (BACT) requirements for 326 IAC 2-2 are equivalent to BACT requirements for this rule.

D.1.8 Lead Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-8091-00043 and 326 IAC 2-2 PSD Best Available Control Technology (BACT) the lead emissions from the EAF baghouse shall not exceed 0.19 pounds per hour.

D.1.9 Mercury Limitations [326 IAC 2-2]

The mercury emissions from the EAF baghouse shall not exceed 0.022 pounds per hour. Compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.10 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the melt shop Stack 01 shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). This condition will satisfy the NSPS 40 CFR Part 60 Subpart AAa, 40 CFR 60.272a.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the fugitive emissions generated at the melt shop shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60,Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.

(c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the EAF slag pit dig out operation located

beneath each furnace shall not exceed five (5%) percent opacity.

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD -Control Technology Review; Requirements), visible emissions from the building opening and EAF dust handling system shall not exceed three percent (3%) opacity based on a six-minute average(24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vent through bin vents or shall use a pneumatic conveyance.

D.1.11 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the EAFs, except when otherwise specified in 40 CFR Part 60, Subpart AAa.

D.1.12 Visible Emissions Limitations (NSPS) [40 CFR Part 60.272(a)]

(a) Pursuant to 40 CFR 60.272(a)(2), the visible emissions from the EAF baghouse common Stack 01 shall not exceed three percent (3%) opacity, based on a six-minute average.

(b) Pursuant to 40 CFR 60.272(a)(3), the visible emissions from the melt shop due solely to the operations of the electric arc furnace shall not exceed six percent (6%) opacity, based on a six-minute average.

(c) Pursuant to 40 CFR 60.272(b), the visible emissions from the EAF dust handling system shall not exceed ten percent (10%) opacity, based on a six-minute average.

D.1.13 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit is required for the EAFs, continuous casters (#1 and #2), and associated control devices.

Compliance Determination Requirements

D.1.14 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.1.2(b), the Permittee shall perform PM/PM10 testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.9- Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(b) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.1.3(a), the Permittee shall perform NOx testing on the EAF Stack 01, utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(c) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.1.4(a) and (b), the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(d) Within 30 months from the date of the latest compliance demonstration stack test and in

order to demonstrate compliance with Conditions D.1.5, the Permittee shall perform CO testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(e) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.1.6(b), the Permittee shall perform VOC testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(f) Within 180 days after issuance of this Part 70 permit, and in order to demonstrate compliance with Conditions D.1.8 and D.1.9, the Permittee shall perform lead and mercury testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

D.1.15 Particulate Control – (BACT) [326 IAC 2-2]

The EAF baghouse shall be operated at all times when the EAFs and continuous casters are in operation.

D.1.16 CO Control - (BACT) [326 IAC 2-2]

The Direct Shell Evacuation System shall be in operation at all times the EAFs are in operation in a manner to control CO emissions.

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

D.1.17 Visible Emission Observations and Continuous Opacity Monitoring [326 IAC 3-5] [40 CFR 60.273a]

Pursuant to 326 IAC 3-5 and 40 CFR 60.273a, the Permittee shall do the following to demonstrate compliance with Condition D.1.12:

(a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.

(b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.

(c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(d) Whenever a COM is malfunctioning or is down for maintenance, or repairs for a period of twenty-four (24) hours or more**,** and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

(1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during

daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.

(3) Method 9 readings may be discontinued once a COMS is online.

(4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 60.

D.1.18 Visible Emission Notations

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997, visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C.16 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.19 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the EAFs at least once per day when the EAFs are in operation, when for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C.16 - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16 - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.20 Monitoring of Operations [40 CFR 60.274a] [40 CFR 60.273a]

Pursuant to CP 033-8091-00043 and 40 CFR 60.274a, the Permittee shall comply with the following monitoring requirements for the EAF:

(a) Except as provided under item (c) of this condition, the Permittee shall check and record on a once per shift basis the furnace static pressure if the DEC system is in use, and a furnace static pressure gauge is installed according to item (d) of this condition and either:

(1) check and record the control system fan motor amperes and damper positions on a once-per-shift basis;

(2) calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or

(3) calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and checks and records damper positions on a once-per-shift basis.

The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result.

The flow rate monitoring device(s) shall have an accuracy of ± plus or minus ten (10%) percent over its normal operating range and shall be calibrated according to the manufacturer's instructions.

The IDEM, OAQ, or the U.S. EPA may require the Permittee to demonstrate the accuracy of the monitoring device(s) relative to Methods 1 and 2 of 40 CFR Part 60, Appendix A.

(b) The Permittee of an EAF, shall determine either:

(1) the control system fan motor amperes and all damper positions or
(2) the volumetric flow rate through each separately ducted hood

during all periods in which a hood is operated for the purpose of capturing emissions from the EAFs.

(c) The Permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e. pressure sensors, dampers, and damper switches).

This inspection shall include observations of the physical appearance of the equipment (e.g. presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.

(d) Except as provided under item (f) of this condition, if emissions during any phase of the heat time are controlled by the use of a DEC system, the Permittee shall, calibrate, and maintain a monitoring device that allows the pressure in the free space inside the EAF to be monitored. The pressure shall be recorded as 15-minute integrated averages.

The monitoring device may be installed in any appropriate location in the EAF or DEC duct prior to the introduction of ambient air such that reproducible results will be obtained.

The pressure monitoring device shall have an accuracy of ± 5 millimeter of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.

(e) Except as provided under item (f) in this condition, when the Permittee is required to demonstrate compliance with the standard under Condition D.1.12(a) and at any other time the U.S. EPA may require under Section 114 of the CAA, the pressure in the free space inside the EAF shall be determined during the melting and refining period(s) using the monitoring device required under item (d) of this condition.

The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period.

(f) Pursuant to 40 CFR 60.273a(d), a furnace static pressure monitoring device is not required on any EAF equipped with a DEC system if observations of the shop opacity are

performed by a certified visible emission observer as follows:

(1) Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period.

(2) Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9.

(3) Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required.

(4) In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.

Record Keeping and Reporting Requirements

D.1.21 Record Keeping Requirements [40 CFR 60.276a]

(a) To demonstrate compliance with Conditions D.1.2 through D.1.12, the Permittee shall maintain records of the throughput, natural gas usage and opacity emission records for the melt shop operations.

(b) To document compliance with operation condition D.1.17, the Permittee shall maintain records:

(1) required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA., if so requested or required.

(2) of visible emission readings at the melt shop Stack and make available upon request to IDEM, OAQ, and the U.S. EPA.

(c) To document compliance with Condition D.1.18, the Permittee shall maintain records of visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors once per day.

(d) To document compliance with Condition D.1.19, the Permittee shall maintain records once per day of the pressure drop during normal operation.

(e) Pursuant to 40 CFR 60.276a, records of the measurements required in 40 CFR 60.274a, as also required in condition D.1.20, must be retained for at least 5 years following the date of the measurement.

(f) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

D.1.22 Reporting Requirements [40 CFR 60.276a][326 IAC 3-5-7]

(a) The Permittee shall submit to IDEM, OAQ a quarterly excess emissions report, if applicable, based on the continuous opacity monitor (COM) data, pursuant to 326 IAC 3-5-7. These reports shall be submitted no later than thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C.20 - General Reporting Requirements of this permit.

(b) Pursuant to 40 CFR 60.276a, the Permittee shall comply with the following reporting requirements:

(1) The Permittee shall submit a semi-annual written report of exceedances of the control device opacity to IDEM, OAQ, and the U.S. EPA.

(2) The Permittee shall submit semi-annually any values that exceed furnace static pressure established under 40 CFR 60.274a(g) and values of control system fan motor amperes that exceed 15 percent of the value established under 40 CFR 60.274a(c) or values of flow rates lower than those established under 40 CFR 60.274a(c) to IDEM, OAQ, and the U.S. EPA.

(c) The reports submitted by the Permittee do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS (LADLE METALLURGICAL)

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

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (South constructed in 1995 and North constructed in 1998), each with a nominal capacity of 200 tons per hour. Particulate (PM/PM10) emissions are controlled by the Ladle Metallurgical Facility (LMF) baghouse (constructed in 1998) exhausting through Stack 61. The LMS consists of the following:

(a) Three (3) Ladle Metallurgical furnaces (LMF), and

(b) Two (2) stir stations.

(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 (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to Stack 61.

(b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the LMF Stack 61 shall not exceed 0.0032 grains per dry standard cubic foot. At a maximum air flow rate of 200,000 standard cubic feet per minute, this limit is equivalent to 5.49 pounds of PM/PM-10 per hour.

D.2.2 Nitrogen Oxides (NO_x) Limitations- Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the NOx emissions from the LMF Stack 61 shall not exceed 0.025 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 10 pounds of NOx emissions per hour.

D.2.3 Sulfur Dioxide (SO_2) Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF Stack 61 and the existing EAFs Stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 80 pounds of SO_2 per hour.

D.2.4 Carbon Monoxide (CO) Limitations- Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), CO emissions from LMF Stack 61 shall not exceed 0.1 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 40 pounds of CO per hour.

D.2.5 VOC Emissions Limitations (326 IAC 2-2) (PSD)

Pursuant to CP 033-9187-00043, issued March 24, 1998, VOC emissions from the LMF Stack 61 shall not exceed 0.013 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 5.21 pounds of VOC per hour. Compliance with this condition makes 326 IAC 2-2 not applicable.

D.2.6 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse Stack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(b) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD -Control Technology Review; Requirements), visible emissions escaping the capture hood for the LMF shall be minimized by operating the fan associated with the LMF baghouse according to manufacturer specifications such that the capture efficiency of the hood is maximized.

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit is required for the LMF and the associated control devices.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM/PM10 testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.9- Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.

(b) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform NOx testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.

(c) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration.

(d) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.2.4, the Permittee shall perform CO testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(e) Within 30 months from the date of the latest compliance demonstration stack test and, in order to demonstrate compliance with Conditions D.2.5, the Permittee shall perform VOC testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

D.2.9 Particulate Control – (BACT) [326 IAC 2-2] [326 IAC 2-7-6(6)]

(a) Pursuant to 326 IAC 2-2, the LMF baghouse shall be operated at all times when the LMSs and stir stations are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

D.2.10 Visible Emission Notations

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998, visible emission notations of the LMF Baghouse Stack 61 exhaust, shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C.16 - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C.16 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.2.11 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the LMF at least once per day when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16- Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

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

D.2.12 Record Keeping Requirements

(a) To document compliance with Condition D.2.10, the Permittee shall maintain records of visible emission notations of the LMF Stack 61 exhaust once per day.

(b) To document compliance with Condition D.2.11, the Permittee shall maintain records once per day of the pressure drop during normal operation.

(c) All records shall be maintained in accordance with the Section C.19 - General Record Keeping requirements of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

Hot Mill Operations – Tunnel Furnaces

(a) One (1) tunnel furnace, No. 1 South, constructed in 1995, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through Stack 2.

(b) One (1) tunnel furnace, No. 2 North, constructed in 1998, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through Stack 42.

(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 Nitrogen Oxides (NOx) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 1 shall be limited to solely to the use of low NOx natural gas fired burners and shall not exceed 117.9 MMBtu per hour heat input and NOx emissions shall not exceed 0.17 pounds per MMBtu.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 2 heating zone shall be equipped with low NOx natural gas fired burners not exceeding 92 MMBtu per hour heat input and NOx emissions shall not exceed 0.10 pounds per MMBtu. The total emissions per hour shall not exceed 9.2 pounds per hour through Stack 42.

D.3.2 Visible Emissions Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043, issued October 7,1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from Tunnel furnace No. 1 (Stack 2), shall not exceed five percent (5%). The opacity shall be determined by 40 CFR 60, Appendix A, Method 9.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from Tunnel Furnace No. 2 (Stack 42), shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9.).

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10– Preventive Maintenance Plan of this permit is required for the Tunnel Furnace No. 1 and Tunnel Furnace No.2 natural gas fired burners.

SECTION D.4 FACILITY OPERATION CONDITIONS (PICKLE LINE)

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

Cold Mill Operations - Pickling Line

One (1) pickling line with a nominal capacity of 1.4 million tons per year, constructed in 1997, with a packed scrubber and covered tanks maintained under negative pressure for Hydrochloric Acid (HCl) control and mist eliminator for PM/PM-10 control, exhausting to Stack 17.

(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 Emissions Limitations - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line particulate matter emissions shall be controlled by a scrubber Stack and the particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour.

D.4.2 Hydrochloric Acid (HCl) Pickling Emission Limitation

Pursuant to CP 033-5625-00043, issued August 8, 1996, the hydrochloric acid mist from the pickle line shall be controlled by a scrubber and mist eliminator. Emissions shall not exceed 0.32 pounds per hour.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the pickle line, scrubber and mist eliminator.

Compliance Determination Requirements

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within 30 months from the date of the latest compliance demonstration stack test and in order to comply with condition D.4.2, the Permittee shall perform a hydrochloric acid test on the pickle line Stack 17, utilizing methods as approved by the Commissioner in accordance with Section C.9- Performance Testing. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration

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D.4.5 Particulate Control (BACT) [326 IAC 2-2] and HCl Emissions Control

The pickling line scrubber and mist eliminator shall be in operation at all times the pickling line is in operation to control particulate matter and HCl emissions.

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

D.4.6 Parametric Monitoring

(a) The Permittee shall record the flow rate of the packed scrubber used in conjunction with the Pickling Line, at least once per day when the Pickling Line is in operation. When for any one reading, the flow rate of the scrubber is below a minimum of six (6) gallons per minute (gpm) or a minimum flow rate established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances A flow rate that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C.16- Response to Excursions or Exceedances, shall be considered a deviation from this permit.

(b) The instrument used for determining the flow rate shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

D.4.7 Scrubber Failure Detection

In the event, a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.11- Emergency Provisions), or if safety concerns prevent immediate shutdown. If safety concerns prevent immediate shutdown, then feed to the associated process will be shut off immediately and the process shall be shutdown as soon as shutdown would be considered safe.

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

D.4.8 Record Keeping Requirements

(a) To document compliance with Condition D.4.6, the Permittee shall maintain records of the once per day pickle line scrubber flow rate during normal operation.

(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per day visible emission notations.

(b) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS (PICKLE LINE BOILERS

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

Pickle Line Scale Breaker

One (1) scale breaker, constructed in 1997, with a nominal capacity of 1.4 million tons per year that removes scale from the rolled steel prior to the pickling process. Particulate (PM/PM10) emissions are controlled by a baghouse exhausting to Stack 60.

(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 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker particulate matter PM/PM10 emissions shall be controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf and flow rate of 10,600 acfm.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the scale breaker and baghouse.

Compliance Determination Requirements

D.5.3 Particulate Control (BACT) [326 IAC 2-2]

The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.

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

D.5.4 Visible Emission Notations

(a) Visible emission notations of the pickle line scale breaker Stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C.16 - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.5.5 Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pickle line scale breaker, at least once per day when the pickle line

scale breaker is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C.16- Response to Excursions or Exceedances shall be considered a deviation from this permit.

(b) The instrument used for determining the flow rate shall comply with Section C.13 - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

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

D.5.6 Record Keeping Requirements

(a) To document compliance with Condition D.5.4, the Permittee shall maintain records of the once per day visible emission notations.

(c) To document compliance with Condition D.5.5, the Permittee shall maintain records of the pressure drop once per day during normal operation.

(d) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

SECTION D.6 FACILITY OPERATION CONDITIONS (PICKLE LINE BOILERS)

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

Pickle Line Boilers

Three (3) natural gas-fired boilers Nos. 1, 2, and 3, constructed in 1997, equipped with low-NOx burners, exhausting to Stacks 15, 16a, and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour and the CP 033-5625-00043, issued August 8, 1996, permitted the heat input per hour for Boilers Nos. 1 and 2 as 11.8 MMBtu per hour each. Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any time.

(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 Emission Limitations [326 IAC 6-2-4]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions shall not exceed 0.48 pound per MMBtu heat input from only two of three pickle line boilers Nos. 1, 2 and No. 3 used at any time with a combined heat input of 23.6 MMBtu per hour.

D.6.2 Nitrogen Oxides (NOx) Limitations - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the pickle line boilers shall not exceed 81 pounds per million cubic feet (MMCF) of gas burned.

(b) Pursuant to 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

D.6.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the pickle line boilers except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.6.4 Particulate (PM/PM-10) and Sulfur Dioxide (SO_2) Limitations (NSPS) [40 CFR 60, Subpart Dc] [326 IAC 12-1]

Pursuant to CP 033-5625-00043, issued August 8, 1996, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial Boilers Commercial-Institutional Steam Generating Boilers) and 326 IAC 12-1, the pickle line boilers shall burn natural gas only in order to minimize particulate and sulfur dioxide emissions.

D.6.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the pickle line boilers.

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

D.6.6 Record Keeping Requirements

(a) To document compliance with Condition D.6.4, the Permittee shall maintain records of the natural gas usage for the boilers.

(b) To document compliance with Condition D.6.2, the Permittee shall maintain records of when Boiler No. 3 is used as a backup for Boiler No. 1 or Boiler No. 2.

(c) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

SECTION D.7 FACILITY OPERATION CONDITIONS (REVERSING MILL)

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

Reversing Mill

One (1) cold reversing mill, with a nominal capacity of one (1.0) million tons per year constructed in 1997, with a mist eliminator for particulate (PM/PM10) emissions control, exhausting to Stack 18.

(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 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator. Particulate matter emissions from Stack 18 shall not exceed 7.2 pounds per hour.

Compliance Determination Requirements

D.7.2 Particulate Control (BACT) [326 IAC 2-2]

The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation to control particulate emissions.

SECTION D.8 FACILITY OPERATION CONDITIONS (GALVANIZING LINE

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

Galvanizing Lines

(a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel per year, constructed in 1997, heated by a low-NOx burner natural gas-fired heater with a nominal heat input of 45 MMBtu per hour, exhausting to Stack 19.

(b) Twenty-four (24), natural gas fired radiant tube heaters, added to the hot band galvanizing line in 2002. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.

(c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel rolls per year, constructed in 1997, heated by a low-NOx burner natural gas fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

(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 Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band and cold roll galvanizing lines heaters shall burn natural gas only.

D.8.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the hot band galvanizing line heater shall not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band galvanizing line heater shall use low-NOx burners.

(c) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the cold roll galvanizing line heater shall not exceed 200 pounds per MMCF of natural gas burned.

(d) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the cold roll galvanizing line heater shall use low-NOx burners.

D.8.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the hot band line and cold roll line heaters and low NOx burners.

SECTION D.9 FACILITY OPERATION CONDITIONS (ANNEALING)

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

Annealing Furnaces

Sixteen (16) natural gas fired annealing furnaces equipped with low-NOx burners and forty (40) annealing bases, constructed in 1997. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31, and 32.

(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 Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall burn natural gas only.

D.9.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the annealing furnaces shall not exceed 200 pounds per MMCF of natural gas burned..

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall be low-NOx burners.

D.9.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the annealing furnaces and low NOx burners.

SECTION D.10 FACILITY OPERATION CONDITIONS (PAINT LINE)

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

Paint Line (Coil Coating Line)

(a) One (1) 2-side, 2-coat coil coating line, constructed in 2003, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled steel, using a 60 MMBtu per hour heat input capacity burner equipped thermal oxidizer to control VOC emissions exhausting to Stack 78.

(b) Two (2) curing ovens, constructed in 2003, with a combined nominal heat input capacity of 16 MMBtu per hour using a 60 MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions exhausting to Stack 78.

(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 Volatile Organic Compound [326 IAC 2-2]

Pursuant to SSM033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this modification, the VOC emissions shall be limited as follows:

(a) For the 2-side, 2-coat, coil-coating line the input of VOC shall be limited to less than 3894 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This VOC usage limitation in conjunction with the operation of thermal oxidizer at 99% overall control efficiency limits VOC emissions from the coil coating line to less than 38.94 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

(b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall not exceed 60 million Btu per hour. This limits the VOC emissions from the curing ovens to less than 0.02 tons per twelve (12) consecutive month period.

(c) The items (a) and (b) combined, limits the VOC emissions from the 2-side, 2-coat coil coating line modification to less than 40 tons per 12 consecutive months period, with compliance demonstrated at the end of each month. This limit pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) makes this modification minor under this rule.

(d) Item (a) in this condition also limits the HAP emissions from the 2-side, 2-coat coil coating line modification to less than ten (10) tons of a single HAP or twenty-five (25) tons of a combination of HAPs per 12 consecutive months period. This limit makes this modification minor pursuant to 40 CFR Part 63, Subpart SSSS.

(e) During the first twelve (12) months of operation, the input of VOC shall be limited such that the total usage divided by the accumulated months of operation shall not exceed total tons per year as shown in item (a) above divided by twelve (12) months, which equals 324.5 tons per month for the 2-side, 2-coat, coil coating line.

D.10.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-4]

(a) Pursuant to SSM033-15836-00043, issued December 21, 2002 and 326 IAC 8-2-4 (Coil Coating Operations), the volatile organic compound (VOC) discharge to the atmosphere shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the coating applicator from prime and topcoat or single coat operations.

(b) Pursuant to 326 IAC 8-1-2 (b), the coil coating line VOC emissions shall be limited to no greater than the equivalent emissions, 4.02 pounds of VOC per gallon of coating solids, allowed in (a).

The equivalency emissions are determined by the following equation:

$$E = L / (1 - (L/D))$$

Where:

L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating.
D = Density of VOC in coating in pounds per gallon of VOC.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the coil coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency of 46.04% calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.10.3 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60, Subpart TT.

D.10.4 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This facility is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. Permittee shall not cause to be discharged into the atmosphere more than:

(a) 1.17 pounds of VOC per gallon of coating solids applied for each calendar month for 2-side, 2-coat, coating line that continuously uses a thermal oxidizer operated at the most recently demonstrated overall efficiency.

-or-

(b) 10 percent of the VOCs applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency.

D.10.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the coil coating operation and associated control device.

Compliance Determination Requirements

D.10.6 Permanent Total Enclosure [326 IAC 2-2]

Pursuant to SSM033-15836-00043, issued December 21, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for the 2-side, 2 coat, coil coating line, the Permittee shall use a permanent total enclosure:

(a) The capture system for the 2-side, 2-coat, coil coating line shall meet the criteria for a Permanent Total Enclosure as described in 40 CFR 60, Method 204. The Permanent Total Enclosure will meet the testing requirements in condition D.10.8(c).

(b) Verify 100% capture through other methods as approved by the Commissioner.

D.10.7 Thermal Oxidizer - Best Available Control Technology (BACT) [326 IAC 2-2]

The thermal oxidizer shall operate with a control efficiency of not less than 99% at all times when 2-side, 2-coat, coil coating line is in operation. This efficiency is necessary to ensure compliance with conditions D.10.1, D.10.2, and D.10.4.

D.10.8 Testing Requirements [326 IAC 12, 40 CFR 60.463]

(a) The Permittee shall conduct a performance test for each calendar month for each affected facility according to the procedures under condition D.10.8(c), (d), (e), and (f).

(b) 40 CFR 60.8(d) and (f) do not apply to the performance test.

(c) The Permittee shall determine the overall reduction efficiency (R) for the capture system and the control device to determine compliance with condition D.10.4(b).

The Permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c) (1), (2), and (3) of this section, shall be repeated when directed by the Administrator, IDEM, OAQ or when the Permittee elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^{l} C_{bi} Q_{bi}}{\sum_{i=1}^{l} C_{bi} Q_{bi} + \sum_{i=1}^{p} C_{fi} Q_{fi}}$$

Where:

C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).
Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).
C_{fi} = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).
Q_{fi} = the volumetric flow rate of each gas stream emitted directly

l = the number of gas streams entering the control device, and
p = the number of gas streams emitted directly to the atmosphere.

(2) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^{n} C_{bi} Q_{bi} - \sum_{i=1}^{m} C_a Q_a}{\sum_{i=1}^{n} C_{bi} Q_{bi}}$$

Where:

C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).
Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).
n = the number of gas streams entering the control device, and
m = the number of gas streams leaving the control device and entering the atmosphere.

The Permittee shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in § 60.466.

(3) Determine overall reduction efficiency (R) using the following equation:

$$R = EF$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as specified in sections (d) and (e) below.

(d) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility as follows:

(1) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied (G) during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of 40 CFR 60.463 as follows:

(A) Calculate the mass of VOC's used (Mo+Md) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^{n} L_{ci} D_{ci} W_{oi} + \sum_{j=1}^{m} L_{dj} D_{dj}$$

Where:
M_o = Mass of VOC's in coatings consumed, as received in

kilogram (kg)

M_d = Mass of VOC-solvent added to the coatings, in kg

L_c = the volume of each coating consumed, as received in liters

L_d = the volume of each VOC-solvent added to the coatings in liters (l)

W_o = the proportion of VOC's in each coating, as received (fraction by weight)

D_d = density of each VOC-solvent added to the coatings (kg/l)

$\Sigma L_{dj} D_{dj}$ = will be 0 if no VOC solvent is added to the coatings, as received

n = the number of different coatings used during calendar month, and

m = the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used (Ls) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^{n} V_{si} L_{ci}$$

Where

V_s = the proportion of solids in each coating, as received (fraction by volume).

L_c = the volume of each coating consumed, as received in liters

L_s = total volume of solids used in a calendar month

n = the number of different coatings used during the calendar month.

(e) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s}$$

(e) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G (1-R)$$

(f) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

D.10.9 Testing Requirements [326 IAC 3-6] [326 IAC 2-7-6(1), (6)]

(a) Within 30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.10.1 and D.10.2, the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing utilizing methods as approved by the Commissioner. This testing shall be repeated once every five (5) years from the date of the most recent valid compliance demonstration.

(b) The Permittee shall determine the hourly average temperature, minimum operating temperature and duct pressure or fan amperage for the thermal oxidizer from the most recent valid Stack test that demonstrates compliance with the limits in conditions D.10.1

and D.10.2 as approved by IDEM.

(c) Testing shall be conducted in accordance with Section C.9 - Performance Testing.

D.10.10 Volatile Organic Compounds (VOC)

Pursuant to SSM033-15836-00043, issued December 1, 2002, compliance with Condition D.10.1 shall be demonstrated at the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emission for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted = [(VOC input) x (100 - %control efficiency of thermal oxidizer)] + [uncontrolled VOC]

Where VOC input is based on the formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.10.11 Thermal Oxidizer [326 IAC 12, 40 CFR 60.464]

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer to continuously record the combustion temperature of any effluent gases incinerated to achieve compliance with D.10.1, D.10.2 and D.10.4. This system shall have an accuracy of ±2.5^{o}C or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

(b) The Permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control VOC emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with limit in D.10.1, D.10.2 and D.10.4 was demonstrated during the most recent measurement of thermal oxidizer efficiency required by D.10.7 and D.10.8.

(c) The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.

(d) The Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal oxidizer is in operation. The duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant Stack test.

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

D.10.12 Record keeping and Reporting Requirements [326 IAC 12, 40 CFR 60.465]

(a) The Permittee shall identify, record, and submit awritten report to IDEM, OAQ every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under D.10.4. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ, quarterly.

(b) The Permittee shall include in the quarterly reports, instances when the thermal oxidizer temperature drops as defined under D.10.11. If no such periods occur, the owner or operator shall state this in the report.

(c) The Permittee shall maintain at the source, for a period of at least two (2) years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain, at the source, daily records of the thermal oxidizer combustion temperature.

D.10.13 Record Keeping Requirements

(a) To document compliance with Condition D.10.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.10.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or any other information necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(4) The continuous temperature records (on a three hour average basis) for the thermal oxidizer and the average temperature used to demonstrate compliance during the most recent compliant Stack test.

(5) Daily records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C.19- General Record Keeping Requirements, of this permit.

D.10.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.10.1 shall be submitted to the address listed in Section C.20 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.11 FACILITY OPERATION CONDITIONS (SLAG PROCESSING

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

A Slag Handling Operation owned and operated by Edward C. Levy Company - Butler Mill Service.

(a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, constructed in 1995;

(b) One (1) 36”conveyor (#9), with a nominal capacity of 350 tons per hour, constructed in 1995;

(c) One (1) 30”conveyor (#7), with a nominal capacity of 350 tons per hour, constructed in 1995;

(d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, constructed in 1995;

(e) One (1) 24”conveyor (#6), with a nominal capacity of 100 tons per hour, constructed in 1995;

(f) One (1) 30”conveyor (#5), with a nominal capacity of 250 tons per hour, constructed in 1995;

(g) Three (3) 6' by 16' Screens, each with a nominal capacity of 250 tons per hour, constructed in 1995,

(h) One (1) 48”Conveyor (#1), with a nominal capacity of 75 tons per hour, constructed in 1995,

(i) One (1) 24”Stacker (#1), with a nominal capacity of 75 tons per hour, constructed in 1995’

(j) One (1) 24”Stacker (#2), with a nominal capacity of 125 tons per hour, constructed in 1995;

(k) One (1) 24”Conveyor (#12), with a nominal capacity of 40 tons per hour, constructed in 1995;

(l) One (1) 24”Stacker (#4), with a nominal capacity of 50 tons per hour, constructed in 1995;

(m) One (1) 4¼ Standard Crusher, with a nominal capacity of 50 tons per hour, constructed in 1995;

(n) One (1) 30”Conveyor (#8), with a nominal capacity of 25 tons per hour; constructed in 1995;

(o) Two (2) 30”Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, constructed in 2003;

(p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, constructed in 2003, and

(q) Aggregate Storage Piles.

Fugitive emissions from the slag handling operations are controlled as needed by water sprays.

(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 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the slag processing emissions shall be reduced by at least 95 percent based on a PM10 emission basis.

(b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented to reduce emissions from storage piles by eighty (80) percent.

Compliance Determination Requirements

D.11.2 Particulate Control (BACT) [326 IAC 2-2]

The water sprays to control fugitive particulate emissions from the slag handling operations shall be in operation as necessary to control particulate emissions.

D.11.3 Fugitive Dust Control (BACT) [326 IAC 2-2]

The fugitive dust plan shall be implemented as needed to control fugitive dust emissions from the slag handling operation and storage piles.

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

D.11.4 Record Keeping Requirements

(a) To document compliance with Condition D.11.1, the Permittee shall maintain records of the times and type of fugitive dust control measures applied to the slag handling and storage piles, as specified in the Fugitive dust plan.

(b) All records shall be maintained in accordance with Section C.19- General Record Keeping Requirements, of this permit.

SECTION D.12 FACILITY OPERATIONS CONDITIONS (FUGITIVE DUST)

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

Fugitive Dust Sources consisting of but not limited to the following:

(a) Paved roads,

(b) Parking areas,

(c) Unpaved roads and

(d) Traveled open areas.

(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 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented to reduce emissions from the paved roads, parking lots, unpaved roads and traveled open areas by eighty (80%) percent.

Compliance Determination Requirement

D.12.2 Fugitive Dust Control (BACT) [326 IAC 2-2]

The fugitive dust plan which includes control measures (dust suppressant, water sprays and the vacuum/sweeping of paved roads) shall be implemented as needed to control fugitive dust emissions from the paved roads, parking lots, unpaved roads and traveled open areas.

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

D.12.3 Record Keeping Requirements

(a) To document compliance with Condition D.12.1, the Permittee shall maintain records of the times and type of fugitive dust control measures (dust suppressants, water sprays and vacuum/sweeping of paved areas) used as specified in the Fugitive dust plan.

(b) All records shall be maintained in accordance with Section C.19 General Record Keeping Requirements, of this permit.

SECTION D.13 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

1. Specifically regulated insignificant activities as define in 326 IAC 20-6:
   - (a) Temper Mill [326 IAC 6-3-2]
   - (b) 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]

2. Other Insignificant activities
   - (a) Space heaters, process heaters, or boilers using the following fuels:
     - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
     - (ii) 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.
   - (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
   - (c) Combustion source flame safety purging on startup.
   - (d) Fuel dispensing activities, including the following:
     - (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
     - (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. 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:
     - (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
     - (ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
   - (f) Refractory storage not requiring air pollution control equipment.
   - (g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.
   - (h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.
   - (i) Machining where an aqueous cutting coolant continuously floods the machining interface.
   - (j) Closed loop heating and cooling systems.
   - (k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
   - (l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.

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

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

Insignificant Activities (continued):

(m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.
(n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
(o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.
(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
(q) Heat exchanger cleaning and repair.
(r) Process vessel degassing and cleaning to prepare for internal repairs.
(s) Covered conveyors for solid raw material, including the following:
  (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.
  (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
(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) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
(w) Activities associated with emergencies, including the following:
  (i) On-site fire training approved by the department.
  (ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
  (iii) Stationary fire pump engines.
(x) A laboratory as defined in 326 IAC 2-7-1(21)(D)
(y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
(z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F).

(The information describing the processes 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 Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission pound per hour limitation from the temper mill shall be calculated using 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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Steel Dynamics, Inc.
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

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

Please check what document is being certified:

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

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

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Steel Dynamics, Inc.
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

This form consists of 2 pages

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile no later than two (**2**) days (Facsimile Number: 317-233-6865), 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_2, VOC, NO_X, CO, Pb, HCl, 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
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Steel Dynamics, Inc.
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

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

Form completed by: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT QUARTERLY REPORT

Source Name: Steel Dynamics, Inc.
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043
Facility: 2-side, 2-coat, coil coating line (paint line)
Parameter: VOC usage for the coil coating line (paint line)
Limits: 3894 tons per 12 consecutive month period with compliance demonstrated on a monthly basis

Quarter _____ YEAR:_____

	Column 1	Column 2	Column 3 Column 1 + Column 2
Month	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviations occurred in this quarter.

☐ Deviation/s occurred in this quarter.

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT CERTIFICATION

Source Name:	Edward C. Levy Company - Butler Mill Service
Source Address:	4500 County Road 59, Butler, IN 46721
Mailing Address:	4500 County Road 59, Butler, IN 46721
Part 70 Permit No.:	T033-8068-00043

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

Please check what document is being certified:

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

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

Signature: _____

Printed Name: _____

Title/Position: _____

Phone: _____

Date: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Edward C. Levy Company - Butler Mill Service
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

This form consists of 2 pages

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile no later than two (**2**) days (Facsimile Number: 317-233-6865), 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_2, VOC, NO_X, CO, Pb, HCl, 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
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Edward C. Levy Company - Butler Mill Service
Source Address: 4500 County Road 59, Butler, IN 46721
Mailing Address: 4500 County Road 59, Butler, IN 46721
Part 70 Permit No.: T033-8068-00043

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

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

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

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: Steel Dynamics, Inc.
Source Location: 4500 County Road 59, Butler, IN 46721
County: DeKalb
SIC Code: 3312
Operation Permit No.: T033-8068-00043
Permit Reviewer: Gail McGarrity

On January 28, 2004, the Office of Air Quality (OAQ) had a notice published in the Evening Star, Auburn, Indiana, stating that Steel Dynamics, Inc. had applied for a Part 70 Operating Permit to operate a steel minimill. 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.

Written comments were received from Barry Smith of Steel Dynamics, Inc. and Baker and Daniels, on March 29, 2004 and April 21, 2004. These comments and IDEM, OAQ responses, including changes to the permit (where language deleted is shown with ~~strikeout~~ and the added is shown in **bold**) are as follows:

Comment 1

EACH SUBSECTION SHOULD HAVE PAGE NUMBERS ASSIGNED. THE FORM SHOULD HAVE PAGE NUMBERS ASSIGNED AS WELL. SDI PROVIDED THIS TO IDEM IN PREVIOUS ELECTRONIC DRAFTS. THE NAME OF EACH SECTION IN THE TABLE OF CONTENTS DOES NOT NECESSARILY MATCH THAT IN THE ACTUAL SECTIONS. THEY SHOULD BE IDENTICAL.

Response to Comment 1

The Table of Contents has been revised and numbered as requested.

Typos throughout the document have been revised.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**
B.13 Prior Permit**s** ~~Conditions~~ Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

The General Record Keeping Requirements for Section C are revised to add citations in Table of Contents. The permit is revised as follows:

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] ~~[326 IAC 2-7-19]~~ [326 IAC 2-7-6][326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11][326 IAC 2-2]

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

The condition language is revised to match the Table of Contents as follows:

D.1.2 Particulate Limitation (PM/PM-10) Limitations ~~(BACT)~~ **Best Available Control**

Technology [326 IAC 2-2]
D.1.3 Nitrogen Oxides (NOx) Limitation ~~(BACT)~~ **Best Available Control Technology** [326 IAC 2-2]
D.1.4 Sulfur Dioxide (SO2) Limitation ~~(BACT)~~ **Best Available Control Technology** [326 IAC 2-2]
D.1.5 Carbon Monoxide (CO) **L**imitation ~~(BACT)~~ **Best Available Control Technology** [326 IAC 2-2]
D.1.6 Volatile Organic Compounds (VOC) Limitations ~~(BACT)~~ **Best Available Control Technology** [326 IAC 2-2]
D.1.7 VOC General reduction Requirements (BACT): New Facilities[326 IAC 8-1-6]
D.1.8 Lead Limitations [326 IAC 2-2] [326 IAC 2-4.1-1]
D.1.9 Mercury Limitations [326 IAC 2-2]
D.1.~~9~~ **10** Visible Emission Limitations ~~(BACT)~~ **Best Available Control Technology** [326 IAC 2-2]
D.1.~~10~~**11** General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]
D.1.~~11~~**12** Visible Emission Limitations **(NSPS)** [40 CFR Part 60.272(a)]
D.1.~~15~~**16** CO ~~and VOC~~ Control (BACT) [326 IAC 2-2]

The General Record Keeping Requirements for Section D.2 are revised to add citations in Table of Contents. The permit is revised as follows:

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

The General Record Keeping Requirements citations are revised to match citations in Section D.6. The permit is revised as follows:

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19] ~~[40 CFR 60, Subpart Dc]~~

Comment 2

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

(a) The Permittee owns and operates a stationary steel ~~and iron manufacturing plant~~ minimill

(b) Responsible Official: ~~Vice President~~ / Plant Manager or designee

Response to Comment 2

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

(a) The Condition A.1 General Information has been revised as follows:

The Permittee owns and operates a stationary steel ~~and iron manufacturing plant~~ **minimill**.

(b) The "responsible official" for a corporation in 326 IAC 2-7-1(34) (A) means the following:
(i) a president;
(ii) a secretary;
(iii) a treasurer;
(iv) a vice president of the corporation in charge of a principal business function;
(v) any other person who performs similar policy or decision making functions for the corporation; or

(vi) a duly authorized representative of any person listed in this clause if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying for or subject to a Part 70 permit and either:

(AA) the facilities employ more than two hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five million dollars ($25,000,000) (in second quarter 1980 dollars); or

(BB) the delegation of authority to such representative is approved in advance by the commissioner.

Therefore, the "Responsible Official" is revised as follows:

~~Vice President /~~ Plant Manager **or designee (pursuant to 326 IAC 2-7-1(34))**

Comment 3

Condition A.2 Changes to the source definition

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

(a) This ~~steel manufacturing plant~~ The source consists of:

(b) IDEM has determined that Steel Dynamics, Inc. (033-00043) and Iron Dynamics, Inc. (033-00076) are under ~~the~~ common control. These two plants are considered one source for Part 70 applicability.

(c) Separate Part 70 permits will be issued to Steel Dynamics, Inc. (033-8068-00043) and Iron Dynamics, Inc. (033-12614-00076), solely for administrative purposes. For this permit, the Permittee is Steel Dynamics, Inc. the primary operation.

Response to Comment 3

IDEM agrees. Condition A.2 Part 70 Source Definition has been revised to better clarify which emissions units and control devices are associated with Steel Dynamics, Inc., the primary operation. The following changes have been made to the permit to clarify that Condition A.2 is not federally enforceable.

Section A

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.2,** 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.

In addition IDEM has determined that it is not necessary to include the paragraph describing common control for SDI and IDI in Condition A.2.

The language is revised as follows.
~~This steel manufacturing plant~~ **The source** consists of:

(a) Steel Dynamics, Inc~~., the primary operation,~~ located at 4500 County Road 59, Butler, Indiana 46721*;* and

(b) Iron Dynamics, Inc., ~~the supporting operation~~, located at 4500 County Road 59, Butler, Indiana 46721.

~~IDEM has determined that Steel Dynamics, Inc. (033-00043) and Iron Dynamics, Inc. (033-00076) are under common control. These two plants are considered one source for Part 70 applicability.~~

Separate Part 70 permits will be issued to Steel Dynamics, Inc. (033-8068-00043) and Iron Dynamics, Inc. (033-12614-00076), solely for administrative purposes. **For this permit, the Permittee is Steel Dynamics, Inc., the primary operation.**

Comment 4

Changes to Condition A.3 Emission Units and Pollution Control Equipment Summary

Melt Shop Operations

(a) Electric Arc Furnace (EAF)

Two (2) twin shell electric arc furnaces (EAF #1, south constructed in 1995 and EAF #2, north constructed ~~April~~ in 1998), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation control (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of ~~a~~ canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control, and a baghouse (EAF baghouse) for particulate (PM and PM-10) emissions control, exhausting through the EAF ~~stack~~ Stack 01 equipped with a continuous opacity monitor (COM).

(b) Continuous Casters

Two (2) continuous casters (CC #1 south constructed in 1995 and CC #2 north constructed in 1998), each with a nominal capacity of 225 tons per hour. ~~Emissions~~ Particulate matter (PM/PM10 emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

(3) Three (3) tundish ladle dryers with a nominal heat input capacity of 1.5 MMBtu per hour each,

(d) Storage Silos and Bins

(1) Ten (10) storage silos including the following:
(A) Two (~~1~~ 2) EAF dust silos consisting of:

(2) Enclosed, indoor and/or pneumatic conveying to control fugitive emissions.

(e) Slag pit digouts ~~located beneath~~ associated with each electric arc furnace.

(f) Melt shop building openings, dust handling system, melt shop roof monitors.

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (south constructed in 1995 and north constructed in 1998), each with a nominal capacity of 200 tons per hour. ~~Emissions~~ PM/PM10 emissions are controlled by the LMF baghouse (constructed in 1998) with emissions exhausting through Stack 61. The LMS ~~consist~~ consists of the following:

(a) Three (3) Ladle Metallurgical furnaces (LMF), and
(b) Two (2) ~~argon~~ stir stations.

Hot Mill Operations - Tunnel Furnaces

(a) One (1) tunnel furnace, No. 1 south, constructed in 1995, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (nominal 92 MMBtu per hour in the heating zone and nominal 25.9 MMBtu per hour in the holding zone), exhausting through ~~stack~~ Stack 2.

(b) One (1) tunnel furnace, No. 2 north, constructed in 1998, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through ~~stack~~ Stack 42.

Cold Mill Operations

(a) Pickling Line

One (1) ~~1.4 million ton per year~~ pickling line, with a nominal capacity of 1.4 million tons per year, constructed in 1997, with a packed scrubber ~~for HCL control, mist eliminator for PM control~~ and covered tanks maintained under negative pressure, for HCl control, and mist eliminator for PM control exhausting to Stack 17.

(b) Pickle Line Scale Breaker [THIS NEEDS TO BE A SEPARATE SECTION D. IT IS AN ENTIRELY DIFFERENT PROCESS THAN PICKLING, HAS A SEPARATE STACK , A DIFFERENT TYPE OF CONTROL DEVICE, AND A DIFFERENT POLLUTANT.]
One (1) scale breaker, constructed in 1997, with a nominal capacity of 1.4 million tons per year that removes scale from rolled steel prior to the pickling process. Particulate matter emissions are controlled by a baghouse exhausting to ~~stack~~ Stack 60.

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, constructed in 1997, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour ~~and the CP 033-5625-00043, issued August 8, 1996, permitted the heat input per hour for Boilers Nos. 1 and 2 as 11.8 MMBtu per hour each.~~ Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any time.

Reversing Mill

One (1) ~~one (1.0) million tons per year~~ cold reversing mill, with a nominal capacity of one (1.0) million tons per year, constructed in 1997, with a mist eliminator for particulate matter emissions control, exhausting to Stack 18.

Galvanizing Lines

(a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel ~~rolls~~ per year, constructed in 1997, heated by a low NOx burner natural gas- fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through ~~stack~~ Stack 19.

(d) ~~One (1) temper mill, constructed in 19~~ [NOT AN EMISSION UNIT – SEE TSD INSIGNIFICANT LISTING #3]

Paint Line (Coil Coating Line)

(a) One (1) 2-side, 2-coat coil coating line, constructed in 2003, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled ~~painted~~ steel, using a ~~44~~ 60 MMBtu per hour nominal heat in put capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to ~~stack~~ Stack 78.

(b) Two (2) curing ovens, constructed in 2003, ~~each~~ one with a nominal heat input capacity of ~~22~~ 16 MMBtu per hour using a ~~44~~ 60 MMBtu per hour nominal heat in put capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to ~~stack~~ Stack 78.

Slag Handling Operation, owned and operated by Edward C. Levy Company - Butler Mill Service.

(p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, constructed in 2003, and

(q) Aggregate Storage Piles~~; and~~ .

Fugitive emissions from parts of the slag handling operations are controlled as needed by water sprays ~~and minimizing material drop heights,~~

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

Steel Dynamics, Inc. also includes the following insignificant activities:

[PROVIDE COMPLETE LIST OF INSIGNIFICANT AND TRIVIAL ACTIVITY.]

(1) Specifically regulated insignificant activities, which are specifically regulated as defined in 326 IAC 2-7-1(21):

~~(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]~~

~~(b) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF).[326 IAC 8-3-2] [326 IAC 8-3-5]~~

Responses to Comment 4

The descriptions are revised in Condition A.3 Emission Units and Pollution Control Equipment Summary and the corresponding Section D.1 description box as follows:

Melt Shop Operations

(a) Electric Arc Furnace (EAF)

Two (2) twin shell electric arc furnaces (EAF #1 **S**outh, constructed in 1995 and EAF #2 **N**orth, constructed ~~April~~ **in** 1998), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation control (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control, and a baghouse (EAF baghouse) for particulate (PM/PM10) emissions control, exhausting through the EAF ~~stack~~ **S**tack 01 equipped with a **continuous opacity monitor (**COM**)**.

(b) Continuous Casters

Two (2) continuous casters (CC #1 south, constructed in 1995 and CC #2 north, constructed in 1998), each with a **nominal** capacity of 225 tons per hour. ~~Emissions~~ **Particulate (PM/PM10) emissions** are controlled by canopy hoods over each caster exhausting to the EAF baghouse through Stack 01.

(c) Miscellaneous natural gas combustion sources

(3) Three (3) tundish **ladle** dryers with a nominal heat input capacity of 1.5 MMBtu per hour each,

(d) Storage Silos and Bins

(1) Ten (10) storage silos including the following:

(A) Two (~~1~~ **2**) EAF dust silos consisting of:

(2) Enclosed, **indoor and/or** pneumatic conveying to control fugitive emissions.

(e) Slag pit digouts ~~located beneath~~ **associated with** each electric arc furnace.

(f) Melt shop building openings, dust handling system and melt shop roof monitors.

The descriptions are revised are in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.2 description box as follows:

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (**S**outh constructed in 1995 and **N**orth constructed in 1998), each with a nominal capacity of 200 tons per hour. ~~Emissions~~ **Particulate (PM/PM10) emissions** are controlled by the **Ladle Metallurgical Facility (**LMF**)** baghouse (constructed in 1998) exhausting through Stack 61. The LMS ~~consist~~ **consists** of the following:

(a) Three (3) Ladle Metallurgical furnaces (LMF), **and**

(b) Two (2) ~~argon~~ stir stations.

The descriptions are revised are in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.3 description box as follows:

Hot Mill Operations - Tunnel Furnaces

(a) One (1) tunnel furnace, No. 1 south, constructed in 1995, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (**nominal** 92 MMBtu per hour in the heating zone and **nominal** 25.9 MMBtu per hour in the holding zone), exhausting through Stack 2.

(b) One (1) tunnel furnace, No. 2 north, constructed in 1998, using low NOx burners with a nominal heat input capacity of 92 MMBtu per hour in the heating zone, exhausting through ~~stack~~ Stack 42.

The descriptions are revised are in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.4 and D.5 description boxes. The pickling line is listed in Section D.4 alone. The scale breaker description and all requirements are now in Section D.5 alone. As a result of this revision subsequent D Sections have been renumbered and Table of Contents revised. The revised descriptions are as follows:

Cold Mill Operations - Pickling Line

One (1) ~~1.4 million ton per year~~ pickling line, **with a nominal capacity of 1.4 million tons per year,** constructed in 1997, with a packed scrubber ~~for HCL control, mist eliminator for PM control~~ and covered tanks maintained under negative pressure**, for Hydrochloric Acid (HCl) control, and a mist eliminator for PM/PM10 control** exhausting to Stack 17.

Pickle Line Scale Breaker

One (1) scale breaker, constructed in 1997, with a nominal capacity of 1.4 million tons per year that removes scale from **the** rolled steel prior to the pickling process. Particulate **(PM/PM10)** emissions are controlled by a baghouse exhausting to ~~stack~~ Stack 60.

The description in Section D.6 to correspond with the Condition A.3 Emission Units and Pollution Control Equipment Summary. The Condition A.3 for the pickle line boilers was not revised for consistency of description in the permit. The description in Section D.6 was revised as follows:

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, constructed in 1997, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour **and the CP 033-5625-00043, issued August 8, 1996, permitted the heat input per hour for Boilers Nos. 1 and 2 as 11.8 MMBtu per hour each**. Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any time.

The descriptions are revised are in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.7 for consistency of descriptions throughout the permit.

Reversing Mill

One (1) ~~one (1.0) million tons per year~~ cold reversing mill, **with a nominal capacity of one (1.0) million tons per year,** constructed in 1997, with a mist eliminator for particulate **(PM/PM10)** ~~matter~~ emissions control, exhausting to Stack 18.

The temper mill is listed as an insignificant activity in A.4 and Section D.10. The descriptions are revised in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.8 as follows:

Galvanizing Lines

(a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel ~~rolls~~ per year, constructed in 1997, heated by a low NOx burner natural gas fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through ~~stack~~ **Stack** 19.

~~(d) One (1) temper mill, constructed in 19~~

The description in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.10 to correspond with Significant Source Modification 033-15836-00043 amended by 033-16981-00043. The paint line has only one (1) thermal oxidizer. Therefore the thermal oxidizer and curing ovens MMBtu capacities were revised as follows:

Paint Line (Coil Coating Line)

(a) One (1) 2-side, 2-coat coil coating line, constructed in 2003, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled ~~painted~~ steel, using a ~~44~~ **60** MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions ~~and~~ exhausting to ~~stack~~ **Stack** 78.

(b) Two (2) curing ovens, constructed in 2003, ~~each~~ with a **combined** nominal heat input capacity of ~~22~~ **16** MMBtu per hour using a ~~44~~ **60** MMBtu per hour nominal heat input capacity burner equipped thermal oxidizer to control VOC emissions ~~and~~ exhausting to ~~stack~~ **Stack** 78.

The description in Condition A.3 Emission Units and Pollution Control Equipment Summary and Section D.11 is revised as follows:

Slag Handling Operation, owned and operated by Edward C. Levy Company - Butler Mill Service.

(p) One (1) jaw crusher, with a nominal capacity of 100 tons per hour, constructed in 2003, **and**

(q) Aggregate Storage Piles~~; and~~ **.**

Fugitive emissions from the slag handling operations are controlled **as needed** by water sprays. ~~and minimizing material drop heights.~~

The insignificant activities include those insignificant activities listed in the Steel Dynamics, Inc. Part 70 Application on Form GSD-10(a). The trivial activities are not required to be included in the Part 70 permit application. Therefore, trivial activities are not listed in the Part 70 Permit, but they may be accessed on the IDEM website at http://www.in.gov/idem/rules/agency.html in 326 IAC 2-7-1(40). Also, the degreasing operations are not specifically regulated, since the degreasing operations are not subject to 326 IAC 8-3. Condition A.4 was revised as follows:

~~(1)~~ **1.** Specifically regulated insignificant activities, which are specifically regulated as defined in 326 IAC 2-7-1(21):

(a) Temper Mill [326 IAC 6-3-2]

(b) 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]

2. Other Insignificant Activities

(a) Space heaters, process heaters, or boilers using the following fuels:

(i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(ii) 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.

(b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.

(c) Combustion source flame safety purging on startup.

(d) Fuel dispensing activities, including the following:

(i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

(ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, dispensing less than or equal to 230,000 gallons per month.

(e) The following VOC and HAP storage containers:

(i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

(ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Refractory storage not requiring air pollution control equipment.

(g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.

(h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.

(m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or operator, that is, an on-site sewage treatment facility.

(n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.
(r) Process vessel degassing and cleaning to prepare for internal repairs.
(s) Covered conveyors for solid raw material, including the following:
(i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.
(ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.
(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) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
(w) Activities associated with emergencies, including the following:
(i) On-site fire training approved by the department.
(ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
(iii) Stationary fire pump engines.
(x) A laboratory as defined in 326 IAC 2-7-1(21)(D).
~~(a)~~ **(y)** Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. ~~[326 IAC 8-3-2] [326 IAC 8-3-5]~~
~~(b)~~ **(z)** Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F). ~~[326 IAC 8-3-2] [326 IAC 8-3-5]~~

Comment 5

Condition A.5 Part 70 Applicability

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); <u>and</u>

Response to Comment 5

Since both (a) and (b) are applicable to this source, Condition A.5 is revised as follows:

(a) It is a major source, as defined in 326 IAC 2-7-1(22); **and**

Comment 6

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.

Response to Comment 6

Condition B.7 is the direct rule language from 326 IAC 2-7-6(6)(E). The Permittee shall furnish to the commissioner, within a reasonable time, any information that the commissioner, may request in writing to determine whether cause exists for ……. **or to determine compliance with the Part 70 permit** (emphasis). Therefore, the permit is not revised as a result of this comment.

Comment 7

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~~ , [CERTIFICATION CAN COVER ONLY WHAT IS IN PERMIT]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 or its equivalent, with each submittal requiring certification.

Response to Comment 7

Pursuant to 326 IAC 2-7-5(C)(ii), the reporting of deviations from Part 70 permit requirements, including those attributable to upset conditions as define in a Part 70 permit, ….Proper notice submittal under section 16 of this rule satisfies the reporting requirements of this item. Notwithstanding requirements in this section, the reporting of deviations **required by an applicable requirement shall follow the schedule stated in the applicable requirement** (emphasis). Therefore, the permit is not revised as a result of this comment.

IDEM has made the requested revision as follows:

(b) One (1) certification shall be included, using the attached Certification Form **or its equivalent**, with each submittal requiring certification.

Comment 8

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

(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; and

(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). Separate certification by the slag processor may be submitted for the condition in Section D.10.

Response to Comment 8

Condition B.9 is the direct rule language from 326 IAC 2-7-6(5)(C), therefore the permit is not revised as a result of this comment.

Since, the slag handling operation does not have a separate administrative Title 5 permit it is considered part of SDI, Butler. Therefore, the annual compliance certification for the slag handling will be part of the SDI annual compliance certification. The certification form for the slag handling may be certified by a "responsible official" as defined by 326 IAC 2-7-1(34) for the slag handling operation. A certification form, Emergency Occurrence Report and Quarterly Deviation and Compliance Monitoring Report for the slag handling operation are included at the end of the permit.

Comment 9

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~~ no later than ninety (90) days after ~~issuance~~ the effectiveness of this permit condition, including the following information on each facility:

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or ~~contribute~~ is the primary contributor to a violation 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 ~~contributes~~ is the primary contributor to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance specified in the PMPs shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

Response to Comment 9

This permit condition states if specific D sections require PMPs then the Permittee shall prepare PMPs. The word condition does not clarify the meaning of the condition. Therefore, the permit is not revised as a result of this comment.

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness".

IDEM has determined the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Condition B.10 – Preventive Maintenance as follows:

B.10 Preventive Maintenance Plan (PMP) [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) no later than ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification by jobs or titles 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
Indianapolis, Indiana 46204**-2251**

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)~~ **(b)** 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**s** do~~es~~ not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~ **(c)** 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 a Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

Comment 10

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, except as otherwise provided in 326 IAC 2-7-16 of this condition.[CHANGE IS CONSISTENT WITH RULE LANGUAGE]

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northern Regional Office ~~within~~ no later than 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

~~Telephone Number: 1-800-753-5519 (Northern Regional Office)~~
~~or~~
~~Telephone Number: 574-245-4870~~
~~Facsimile Number: 574-245-4877~~
[NO BASIS FOR REQUIRING NOTICE TO TWO LOCATIONS]

(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

No later than two (2) working days ~~of~~ after the time when emission limitations were exceeded due to the emergency.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c) (10) for the emission unit that experienced an emergency be revised in response to an emergency.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report that are found to be valid emergencies.

Response to Comment 10

IDEM has determined the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM

amended the Condition B.11 – Emergency Provisions condition as follows:

Condition B.11(a) The following statement in the above comment, except as otherwise provided in 326 IAC 2-7-16 or this condition is only in part direct language from the rule 326 IAC 2-7-16. Therefore, the permit will be revised as shown below:

Condition B.11(b)(4) the regional office references are not needed.

The following statement in the above comment No later than two (2) working days ~~of~~ after the time when emission limitations were exceeded due to the emergency is not the direct language from 326 IAC 2-7-16(5). The Permittee submitted notice in writing or facsimile ……. **Within two (2) working days of the time when the emissions limitations were exceeded due to the emergency** (emphasis)**.** Therefore, the permit is not revised as a result of this comment.

Condition B.11(h), states all emergencies are to be reported. Therefore, the permit is not revised, as a result of this comment.

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, **except as otherwise provided in this condition.**

(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, 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

~~Telephone Number: 1-800-753-5519 (Northern Regional Office)~~
~~or~~
~~Telephone Number: 574-245-4870~~
~~Facsimile Number: 574-245-4877~~

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue~~, P. O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

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

The notice fulfills the requirement of 326 IAC 2-7-5(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) **The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However,** IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4)~~(10)~~ **(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.

Comment 11

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3) (C) (ii)]

(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~~

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

(c) Proceedings by IDEM, OAQ, ~~determines any of the following~~: determining 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 ~~determines any of the following~~: at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ ~~determines any of the following:~~ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)] [CHANGE S CONSISTENT WITH RULE LANGUAGE]

Response to Comment 11

Condition B.14(b) is renumbered B.15(b) and B.15 is renumbered B.16 had typos. The permit is revised as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3) (C) (ii)]

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. ~~Permit Modification, Reopening , Revocation and Reissuance, or Termination~~

B.16 Permit Modification, Reopening, Revocation and ~~Reissuabce~~ **Reissuance**, or Termination

(c) Proceedings by IDEM, OAQ, ~~determines any of the following:~~ 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 ~~determines any of the following:~~ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ ~~determines any of the following:~~ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

Comment 12

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).

(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 reasonable deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

Response to Comment 12

Condition B.16(a) is renumbered B.17 is revised as follows:

B.17 Permit Renewal [326 IAC 2-7-4][326 IAC 2-7-8(e)]

(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).

Condition B.17(c), the deadline for submission will be specified in the written request for additional information. Therefore, the permit condition is not revised as a result of this comment.

Comment 13

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 <u>or notice</u> 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.

Response to Comment 13

Condition B.18(a) is renumbered B.19(a), is language directly from the rule 326 IAC 2-7-5(8) and the requested language addition is not in the rule. Therefore, the permit condition is not revised as a result of this comment.

Comment 14

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;~~ <u>[CHANGE CONSISTENT WITH RULE LANGUAGE]</u>

Response to Comment 14

Condition B.19(a)(2) is renumbered B.20(a)(2) and refers to 326 IAC 2-7-10.5, which lists any preconstruction approval that "might" be necessary depending on the change or changes made at the source. Therefore, the permit condition is not revised as a result of the comment.

IDEM has clarified the Section B Operational Flexibility condition as follows:

B.20 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~~ **limitations provided in** 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~~ **46204-2251**

and

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

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

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

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(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 **emissions** increases and decreases ~~in emissions in~~ **at** the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(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.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

Comment 15

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

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

Response to Comment 15

Condition B.20 is renumbered B.21 and contains the applicable rules to modify, reconstruct or construct a source. With all the different subsections of the rule any of these actions could trigger any part of the rules, so the entire rules 326 IAC 2 and 326 IAC 2-7-10.5 are stated in the condition. Therefore, the permit condition is not revised as a result of this comment.

Comment 16

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC13-30-3-1] [IC13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to any legal privilege and 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 and the U.S. EPA, or an authorized representative to perform the following:

(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 regulated under this permit for the purpose of assuring compliance with this permit or applicable requirements; and

Response to Comment 16

Condition B.21 is renumbered B.22 and the addition of the phrase, "any legal privilege and", would be reiterating what is already stated in the condition.

Condition B.21(d) is renumbered B.22(d) and contains language directly from the rule. Therefore, the permit conditions B.22 and B.22(d) are not revised as a result of this comment.

Comment 17

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

(b) Any application requesting a permit revision that allows for 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:

Response to Comment 17

Condition B.22(b) is renumbered B.23(b) and including the language underlined above will better clarify the condition which is taken directly from the rule language in 326 IAC 2-7-11. Therefore the condition is revised as follows:

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(b) Any application requesting **a permit revision that allows for 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:

Comment 18

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~~ no later than thirty (30) calendar days ~~of~~ after 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~~.

Response to Comment 18

Condition B.23(a) is renumbered B.24. The language is taken directly from the rule, therefore the permit condition is not revised as a result of this comment.

Condition B.23(b) is renumbered B.24(b). Pursuant to 326 IAC 2-1.1-7(8), If an annual fee is being paid. Failure to pay in accordance with the fee payment schedule that results in substantial nonpayment of the fee may result in revocation of the permit. Therefore, the permit condition is not revised as a result of the comment.

Comment 19

C.1 Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

~~(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.~~ [PROVIDE REGULATORY AUTHORITY OR OMIT]

Response to Comment 19

The 326 IAC 6-3 revisions that became effective on June 12, 2002 were approved into the State Implementation Plan on September 23, 2005. These rules replace the previous version of 326

IAC 6-3 (Process Operations) that had been part of the SIP; therefore, the requirements of the previous version of 326 IAC 6-3-2 are no longer applicable to this source. Condition C.1 has been revised to remove (a) which contained these requirements, and since the requirements of the 326 IAC 6-3-2(d) that became effective June 12, 2002 are now federally enforceable. Therefore, the permit is revised as follows:

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.**

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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]

Comment 20

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 <u>or in this permit. This provision does not prohibit the introduction of feedstock material for melting in electric arc furnaces.</u> 326 IAC 9-1-2 is not federally enforceable.

Response to Comment 20

The definition of "Incinerator" in 326 IAC 1-2-34 states it is "An engineered apparatus that burns waste substances…". The introduction of feedstock material for melting in the EAFs is not burning waste substances. Also, the melting of feedstock material is permitted in the D section covering the EAFs. Therefore, the permit condition is not revised as a result of this comment.

Comment 21

<u>[FOR ASBESTOS ABATEMENT, USE THE NEW IDEM SHORT VERSION]</u>

Response to Comment 21

Condition C.9 is renumbered Condition C.8.

The long version has been deleted and replaced with the short version. The language in the permit is revised as follows:

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~~
~~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.~~

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Comment 22

C.10 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

~~Within~~ 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 ~~Within~~ No 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 ~~Within~~ no later than five (5) days prior to the end of the initial forty-five (45) day period. The notification submitted by the Permittee does not require certification by the "responsible official' as defined by 326 IAC 2-7-1(34).

Response to Comment 22

Condition C.10 is renumbered C.9

Since the addition of the sentence "**The notification submitted by the Permittee does not require certification by the "responsible official' as defined by 326 IAC 2-7-1(34)"** does not change the intent of the condition. Therefore, the condition is revised as follows:

C.~~10~~ **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~~ **46204-2251**

~~within~~ **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).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ ~~Within~~ **no 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 ~~Within~~ **no later than** five (5) days prior to the end of the initial forty-five (45) day period. **The notification submitted by the Permittee does not require certification by the "responsible official' as defined by 326 IAC 2-7-1(34).**

Comment 23

C.12 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~~ no later than ninety (90) days after the effectiveness of this permit ~~issuance. If required by Section D, the~~ condition. The Permittee shall be responsible for installing any ~~necessary~~ equipment required in Section D and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated ~~Within~~ no later than 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 units(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Response to Comment 23

Condition C.12 is renumbered C.11.

IDEM agrees to change "within" to "no later than".

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness".

Pursuant to 326 IAC 2-7-5(3)(A)(iii) with respect to monitoring each Part 70 permit shall contain as necessary, requirements concerning the use, maintenance, and where appropriate installation of monitoring equipment or methods.

Therefore, the permit is revised as follows:

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~~ **no later than** ninety (90) days ~~of~~ **after** 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 **no later than** 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~~ **46204-2251**

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

The notification which shall be submitted by the Permittee does require 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 units(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

Comment 24

[SEE SECTION D.1.16 FOR EXACT LANGUAGE. NO NEED TO HAVE UNDER SECTION
~~C.13 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.~~

~~(b) In the event that a breakdown of a continuous opacity 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 opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~

[WHEN IT IS APPLICABLE TO ONLY ONE EMISSION UNIT AND SPECIFICALLY SPELLED OUT IN SECTION D.1

~~(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.~~

~~(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

~~(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, (and 40 CFR 60 and/or 40 CFR 63)~~

Response to Comment 24

Since, the requirements are listed in Section D.1, the following condition has been deleted. Subsequent conditions will be renumbered as necessary. The Table of Contents will reflect these changes. The permit is revised as follows:

~~C.13 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~

~~(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.~~

~~(b) In the event that a breakdown of a continuous opacity 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 opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~

~~(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.~~

~~(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

~~(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, (and 40 CFR 60 and/or 40 CFR 63)~~

Comment 25

~~C.15 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 pressure drop or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.~~

~~(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(d) 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.~~

[OMIT – NO REGULATORY AUTHORITY]
[LETTER (b) COVERS PRESSURE DROP.]
[ADDS SUBSTANTIVE NEW REQUIREMENTS WITHOUT ANY CORRESPONDING AUTHORITY]
[NO pH METERS REQUIRED BY THIS PERMIT]

Response to Comment 25

Condition C.15 is renumbered C.13.

It is correct that 326 IAC 2-7-5(3) and 326 IAC 2-7-6(1) do not have or use the exact specifications for gauges and instruments however these rules provide the Department the authority to specify provisions in the Part 70 Operating Permit as the Commissioner may require with respect to ensuring that all reasonable information is provided to evaluate continuous compliance with applicable requirements. IDEM has determined that the instrument specification provision is necessary with respect to providing reasonable compliance information. Since there is no pH meter at the source, the requirement for a pH meter has been deleted.

IDEM realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition. Therefore the permit is revised as follows:

C.13 ~~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~~ **When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device** shall have a scale such that the expected ~~normal~~ **maximum** reading **for the normal range** 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 voltage or current 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 five percent (2%) of full scale reading.~~

~~(c) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.~~

~~(d) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

~~(e)~~ **(b)** The Permittee may request **that** the IDEM, OAQ approve the use of ~~a pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

Comment 26

C.16 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~~ has prepared written emergency reduction plans (ERPs) ~~consistent~~ . The plan was submitted May 29, 1997 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]

Response to Comment 26

Condition C.16 is renumbered C.14.

Since an Emergency reduction plan was already submitted by the source, the condition is revised as

follows:

~~C.16 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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee **prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 21, 1998.**

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

Comment 28

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

[OMIT – NO REGULATORY AUTHORITY

(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~~ no later than ninety (90) days after ~~issuance~~ the effectiveness date of this permit condition 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 time frame 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 CFR 60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) ; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement ~~additional~~ appropriate 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, then 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-. 14 Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, ~~in accordance with~~ the response steps required by 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.

Response to Comment 28

Condition C.18 is renumbered C.16.

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

C.16 ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~
Response to Excursions or Exceedances [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. 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 and the Permittee~~

~~documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(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, then 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.~~

~~(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.~~

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records;

(3) inspection of the control device, associated capture system, and the process.

(d) Failure to take reasonable response steps shall be considered a deviation from the permit.

(e) The Permittee shall maintain the following records:

(1) monitoring data;

(2) monitor performance data, if applicable; and

(3) corrective actions taken.

Comment 29

C.19 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 - .10 Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, ~~within~~ no later than thirty (30) days ~~of~~ after receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed ~~within~~ no later than one hundred twenty (120) days ~~of receipt~~ after submission to IDEM, OAQ of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

Response to Comment 29

Condition C.19 is renumbered C.17.

IDEM agrees to change "within" to "no later than". In order to clarify which documents need to be certified by the responsible official response action has been added to the last sentence of the condition. The permit is revised as follows:

C.17 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.**9** - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, ~~within~~ **no later than** thirty (30) days ~~of~~ **after** receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the corrective actions are being implemented.

(b) A retest to demonstrate compliance shall be performed ~~within~~ **no later than** one hundred twenty (120) days ~~of receipt~~ **after submission to IDEM, OAQ** 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 not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 30

C.20 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]
[CHANGE TO REFLECT NEW RULE]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6 that must be received ~~by~~ no later than July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

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

~~(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC~~

~~2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.~~ [LISTED AS MINOR HAP SOURCE IN SECTION A OF THIS PERMIT.]

Response to Comment 30

Condition C.20 is renumbered Condition C.18.

The emission statement condition has been revised to incorporate the revisions of the Emission Statement Rule 326 IAC 2-6 that became effective March 27, 2004 and was federally approved October 29, 2004.

Steel Dynamics is minor for HAPS. HAPS are not required to be reported under the Emission statement Rule 326 IAC 2-6-4(a). In 326 IAC 2-7-5(7) the Part 70 fees are based on the tons of regulated air pollutants emitted as stated in 326 IAC 2-7-19(c). The regulated air pollutants that are to be included for fee assessment are listed in 326 IAC 2-7-1(32). Condition C.19 is revised as follows:

C.~~20~~**18** Emission Statement [326 IAC 2-7-5(3) (C) (iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

Pursuant to 326 IAC 2-6-3(a) (1), the Permittee shall submit no later than July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

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

Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.~~ The ~~annual emission~~ statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

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

~~(c)~~ **(b)** 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.

Comment 31

Record keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Response to Comment 31

The following language to identify the record keeping and reporting requirement conditions in Section C is added to the permit as follows:

Record keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Comment 32

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented ~~within~~ no later than ninety (90) days after the effectiveness date of this permit ~~issuance~~ condition,

Response to Comment 32

Condition C.21 is renumbered C.19.

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word “issuance” with the word “effectiveness.”

IDEM agrees to change “within” to “no later than.” Therefore the permit is revised as follows:

C.~~21~~**19** General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented ~~within~~ **no later than** ninety (90) days **after** permit issuance.

Comment 33

C.22 General Reporting Requirements [326 IAC 2-7-5(3) (C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent for any deviations for which a report is specifically required under Section D. 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~~ no later than thirty (30) days ~~of~~ after 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, 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~~ no later than thirty (30) days of the end of the reporting period. All reports ~~do~~ that require ~~the~~ certification shall be signed 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~~ effectiveness of this permit condition and ending on the last day of the reporting period. Reporting periods are based on calendar months, quarters, or years as required in Section D. .

Response to Comment 33

Condition C.22(a) is renumbered C.20(a).

The deviations covered in condition C.20 include all deviations from conditions in the entire permit not just conditions in the D sections.

IDEM agrees to change "within" to "no later than." Therefore the permit is revised as follows:

C.~~22~~ **20** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]

(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~~ **no later than** thirty (30) days ~~of~~ **after** 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).

The language in Condition C.22(d), which is renumbered C.20(d), is revised to clarify that not all reports need to be signed by the responsible official. IDEM agrees to change "within" to "no later than". Therefore Condition C.20(d) is changed as follows:

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted ~~within~~ **no later than** thirty (30) days of the end of the reporting period. All reports ~~do~~ **that** require ~~the~~ certification **shall be signed** by the "responsible official" as defined by 326 IAC 2-7-1(34).

In Condition D.20(e), Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness". General reporting requirements include the entire permit not just this condition. The underlined time periods were added to clarify the different reporting periods. Therefore Condition C.20(e) is revised as follows:

(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**, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.**

Comment 34

Stratospheric Ozone Protection

C.23 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 applicable 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.~~

Response to Comment 34

Condition C.23 is renumbered Condition C.21.

Stratospheric Ozone Protection 40 CFR 82, regulates the handling of ozone depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more of these subject units. Maintenance or repair of such units has the potential to release substances controlled under 40 CFR 82. Pursuant to 326 IAC 22-1 the Air Pollution Control Board incorporated the provisions of 40 CFR 82 for the purposes of implementing the Stratospheric Ozone Protection program that meets the requirements of Title VI of the Clean Air Act with respect to sources operating pursuant to a Part 70 permit. Therefore, the permit is not revised as a result of this comment.

Comment 35

C.23 Alternative ~~operating~~ Operating Scenario

The Permittee may use propane gas as an alternative fuel for natural gas during emergency situations.

Response to Comment 35

Condition C.23 is renumbered C.22.

The “o” in operating was revised as follows:

C.22 Alternative ~~o~~**O**perating Scenario

The Permittee may use propane gas as an alternative fuel for natural gas during emergency situations.

Comment 36

D.1.1 Particulate Matter (PM) Limitations [40 CFR Part 60, Subpart AAa]

Pursuant to 40 CFR 60, Subpart AAa (Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarbonization Vessels Constructed After August 7, 1983),

filterable emissions from the EAF baghouse due solely to EAF operations shall not exceed 0.0052 grains per dry standard cubic feet.

Response to Comment 36

The rule language in 40 CFR 60.272a(a)(1), the Permittee subject to the provisions of this subpart shall not cause to be discharged into the atmosphere from an EAF any gases which exit from a control device and contain particulate matter in excess of 0.0052 gr/dscf. 40 CFR 60.275 specifically addressed both issues by specifying the stack test methods and providing for a means of measuring EAF emissions only. Therefore, the permit is not revised as a result of this comment.

Comment 37

D.1.2 Particulate Limitation (PM/PM-10) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the ~~EAFs 1 and 2~~, EAF baghouse Stack 01 filterable PM/PM-10 emissions shall be controlled by a direct shell evacuation system and canopy hood ~~with 100 percent overall capture~~ exhausted to a baghouse ~~with 99.85 control efficiency, at an air flow rate of 1.3 million dscfm~~, discharging through ~~a~~ Stack 01 ~~at a height of 125 feet above the ground.~~ A slight negative pressure shall be maintained to draw particulate matter through the DSE duct.
[PM LIMITS BASED ON FILTERABLE EMISSIONS ONLY] [100 PERCENT CAPTURE IS NOT CONSISTENT WITH OTHER STEEL MILL PERMITS OR OPACITY LIMITS FOR BUILDING OPENINGS.]

(b) Pursuant to CP 033-8091-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), filterable PM/PM-10 emissions from the EAF baghouse Stack 01 shall not exceed 0.0032 grains per dry standard cubic feet ~~at an air flow rate of 1.3 million dscfm (1.62 million acfm~~) and a maximum PM/PM-10 emissions of 35.7 pounds per hour.

(c) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD – Control Technology Review; Requirements), filterable PM/PM-10 emissions from the continuous casters shall be controlled by canopy hoods and exhausted to the EAF baghouse to Stack 01.

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the Permittee shall do the following~~:~~ as needed:
[MECHANICAL REDUCTION IS NOT ALWAYS NEEDED]

(1) Mechanically reduce skulls, coils and steel scrap in size.

(2) Transport any skulls, coils and steel scrap not mechanically reduced in size to the steel works building and oxygen lance/cut under a furnace canopy using the baghouse to control emissions.

Response to Comment 37

The language in Conditions D.1.2(a), (b) and (c) is language taken verbatim from Construction Permit 033-8091-00043. The particulate matter emissions (PM/PM10) were not specified as filterable in this construction permit. This Construction Permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change

such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

In Condition D.1.2(d) not all scrap needs to be mechanically reduced in sized, this part of the permit condition is revised as follows:

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD Control Technology Review; Requirements), the Permittee shall do the following **as needed**:

(1) Mechanically reduce skulls, coils and steel scrap in size.

(2) Transport any skulls, coils and steel scrap not mechanically reduced in size to the steel works building and oxygen lance/cut under a furnace canopy using the baghouse to control emissions.

Comment 38

D.1.3 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), ~~EAFs #1 and #2 shall be limited to use only low-NOx natural gas fired burners, and~~ EAF baghouse Stack 01 NO_x emissions shall not exceed 0.51 pounds per ton of steel produced. The total NOx emissions shall not exceed 204.0 pounds per hour.

(b) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, and ~~shall not exceed 10 MMBtu per hour heat input~~ NOx emissions shall not exceed 0.10 lbs/MMBtu.

(c) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the four (4) Ladle Preheat Stations (LPS) shall be limited ~~solely~~ to the use of low-NOx natural gas-fired burners. The four (4) horizontal preheater stations ~~combined shall not exceed 40 MMBtu per hour heat input and the~~ NOx emissions shall not exceed 0.14 lbs/MMBtu.

(d) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the three (3) Tundish dryers shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner ~~shall be limited to 1.5 MMBtu per hour heat input and~~ the NOx emissions shall not exceed 0.10 lbs/MMBtu.

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the two (2) Tundish Preheaters shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner ~~shall not exceed 9.4 MMBtu per hour heat input and the~~ NOx emissions shall not exceed 0.10 lbs/MMBtu.

Response to Comment 38

To clarify the language in this part of Condition D.1.3(a), the permit is revised as follows:

D.1.3 Nitrogen Oxides (NO_x) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements~~), EAFs #1 and #2 shall be limited to use only low-NOx natural gas fired burners, and~~ **the** NO_x emissions **from the EAFs using low NOx**

natural gas fired burners shall not exceed 0.51 pounds per ton of steel produced. The total NOx emissions shall not exceed 204.0 pounds per hour.

In Condition D.1.3 (b) through (e), the NOx limits as stated in this condition are the limits and language taken directly from the construction permit CP 033-8091-00043 and Amendment 033-4997-00043. This construction permit and amendment were reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

Comment 39

D.1.4 Sulfur Dioxide (SO_2) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF stack 61 and the existing EAFs ~~(#1 and #2) stack~~ Stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced~~. At a maximum process throughput of 400 tons per hour, this~~ This limit is equivalent to 80 pounds of SO_2 per hour.

(b) Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO2 emissions from the EAFs ~~(#1 and #2)~~ shall be controlled by ~~the use of high quality scrap and~~ monitoring the sulfur content of the coke.

Response to Comment 39

The SO_2 limits as stated in Condition D.1.4 are the limits and language taken directly from the construction permits CP033-8091-00043 and CP033-9187-00043. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. However, the reference to the EAFs is revised as follows:

D.1.4 Sulfur Dioxide (SO_2) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF Stack 61 and the existing EAFs ~~(#1 and #2)~~ **S**~~s~~tack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 80 pounds of SO_2 per hour.

(b) Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the EAFs ~~(#1 and #2)~~ shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke.

Comment 40

D.1.5 Carbon Monoxide (CO) Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD – Control Technology Review; Requirements), the CO emissions from EAFs ~~(#1and #2)~~ shall be controlled by an adjustment gap between the EAF direct shell evacuation system (DSE) and the remaining water cooled duct to common baghouse. The CO emissions shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions shall not exceed 800 pounds per hour. A slight negative pressure shall be maintained at the gap to ensure further combustion of the CO.

Response to Comment 40

In Condition D.1.5 the reference to the EAFs is revised as follows:

D.1.5 Carbon Monoxide (CO) Limitations - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD – Control Technology Review; Requirements), the CO emissions from EAFs ~~(#1and #2)~~ shall be controlled by an adjustment gap between the EAF direct shell evacuation system (DSE) and the remaining water cooled duct to common baghouse. The CO emissions shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions shall not exceed 800 pounds per hour. A slight negative pressure shall be maintained at the gap to ensure further combustion of the CO.

Comment 41

D.1.6 Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), VOC emissions from EAFs ~~(#1 and #2)~~ shall be controlled through ~~an extensive~~ the scrap management program~~. All grades of scrap shall be free of non-ferrous metals, non-metallic, excessive dirt, oil, grease, and tin plate. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used~~. [OMIT SINCE WE HAVE SCRAP PROGRAM]

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the VOC emissions from the EAFs ~~(#1 and #2)~~ shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from the EAFs ~~(#1 and #2)~~ the EAF baghouse Stack 01 shall not exceed 52.0 pounds per hour.

Response to Comment 41

The VOC limit as stated in Condition D.1.6 is the limit and language taken directly from construction permits CP033-3692-00043 and CP033-8091-00043. These construction permits were reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. However, the scrap management plan was filed with IDEM, OAQ, so it is stated in the condition D.1.6(a) and the reference to the EAFs and revised as follows:

D.1.6 Volatile Organic Compounds (VOC) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), VOC emissions from EAFs ~~(#1 and #2)~~ shall be controlled through ~~an~~ **the** extensive scrap management program **attached to this permit.** All grades of scrap shall be free of non-ferrous metals, non-metallic, excessive dirt, oil, grease, and tin plate. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the VOC emissions from the EAFs ~~(#1 and #2)~~ shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from the EAFs ~~(#1 and #2)~~ **baghouse Stack 01** shall not exceed 52.0 pounds per hour.

Comment 42

~~D.1.7 VOC General Reduction Requirements (BACT): New Facilities [326 IAC 8-1-6~~] [NOT REQUIRED SINCE FACILITY WAS PERMITTED UNDER PSD

~~Pursuant to 326 IAC 8-1-6, the EAFs (#1 and #2) Best Available Control Technology (BACT) requirements for 326 IAC 2-2 are equivalent to BACT requirements for this rule.~~

Response to Comment 42

In Condition D.1.7, the equipment was permitted under prevention of significant deterioration and the condition states that the requirements for the VOC under PSD satisfy the VOC general reduction requirements for BACT. Therefore, the permit is not revised as a result of this comment.

Comment 43

D.1.9 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

~~(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the EAF baghouse Stack 01 shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9). This condition will satisfy the NSPS 40 CFR Part 60 Subpart AAa, 40 CFR 60.272a~~. [COM REQUIRED UNDER d.1.11.]

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the fugitive emissions generated at the ~~EAFs~~ melt shop shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60,Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.

~~(c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the EAF slag pit digout operation located beneath each furnace shall not exceed five (5%) percent opacity.~~
[AN INSIDE SOURCE. NO PLACE TO TAKE READINGS.]

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD -Control Technology Review; Requirements), visible emissions from the building opening and EAF dust handling system shall not exceed three percent (3%) opacity based on a six-minute average(24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vent through bin vents or shall use a pneumatic conveyance.

Response to Comment 43

Condition D.1.9(a) includes an opacity limit. The Permittee uses the continuous opacity monitor (COM) system as described in D.1.11 to comply with this limit. Therefore the permit is not revised as a result of this comment.

Condition D.1.9(b)

Since the opacity is for the EAF that is surrounded by the melt shop, the condition is revised as follows:

D.1.9 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the fugitive emissions generated at the ~~EAFs~~ **melt shop** shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60 Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.

In Condition D.1.9(c) the five (5%) percent opacity limit taken from CP 033-3692-00043 is for visible emissions from any stack, other process emissions, control device, building roof monitor or EAF slag pit dig out located beneath each furnace shall not exceed five (5%) percent opacity, unless otherwise specified in other conditions in this permit. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. To renumber the conditions in Section D.1 (See IDEM Change 25), the permit is revised as follows:

D.1.~~9~~**10** Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the EAF slag pit dig out operation located beneath each furnace shall not exceed five (5%) percent opacity.

In Condition D.1.9(e) renumbered D.1.10(e), the pneumatic conveyance is part of the operation and the permit is revised as follows:

D.1.10 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(e) Pursuant to A033-4997-00043, issued November 16, 1995 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vent through bin vents **or shall use a pneumatic conveyance.**

Comment 44

D.1.10 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the EAF, except when otherwise specified in 40 CFR Part 60, Subpart AAa.[SPECIFY WHICH PARTS OF SUBPART A ARE NOT APPLICABLE.]

Response to Comment 44

Condition D.1.10 renumbered D.1.11 is a general condition that states the EPA New Source Performance Standards for the EAFs have been incorporated by reference into our state rule, 326 IAC 12-1. All of the General Provisions in 40 CFR 60, Subpart A apply, except if 40 CFR 60 Subpart AAa specifies otherwise.

Therefore the permit is not revised as result of this comment. The condition D.1.10 is renumbered D.1.11.

D.1.~~10~~ **11** General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

Comment 45

D.1.11 Visible Emissions Limitations (NSPS) [40 CFR Part 60.272(a)]

~~(a) Pursuant to 40 CFR 60.272(a)(1),~~ [ALREADY LISTED IN D.1], ~~the particulate matter (PM) emissions from the EAF common Stack 01 shall not exceed 0.0052 gr/dscf.~~

(a)~~(b)~~ Pursuant to 40 CFR 60.272(a)(2), the visible emissions from the EAF baghouse common Stack 01 due solely to the operation of the electric arc furnace shall not exceed 3% percent opacity, based on a six-minute average.

(c) Pursuant to 40 CFR 60.272(a)(3), the visible emissions from the melt shop due solely to the operations of the electric arc furnace shall not exceed 6% percent opacity, based on a six-minute average.

(d) Pursuant to 40 CFR 60.272(b), the visible emissions from the EAF dust handling system shall not exceed 10% percent opacity, based on a six-minute average.

Response to Comment 45

Condition D.1.11(a), renumbered D.1.12(a) specifies a limit for PM/PM10 listed in Condition D.1.1. This duplicate condition is deleted from this condition. Subsequent items are renumbered. Therefore, the permit is revised as follows:

D.1.~~11~~**12** Visible Emissions Limitations (NSPS) [40 CFR Part 60.272(a)]

~~(a) Pursuant to 40 CFR 60.272(a)(1),~~ [ALREADY LISTED IN D.1], ~~the particulate matter (PM) emissions from the EAF common Stack 01 shall not exceed 0.0052 gr/dscf.~~

(a)~~(b)~~ Pursuant to 40 CFR 60.272(a)(2), the visible emissions from the EAF baghouse common Stack 01 shall not exceed **three percent** (3%) ~~percent~~ opacity, based on a six-minute average.

(b)~~(c)~~ Pursuant to 40 CFR 60.272(a)(3), the visible emissions from the melt shop due solely to the operations of the electric arc furnace shall not exceed **six percent** (6%) ~~percent~~ opacity, based on a six-minute average.

(c)~~(d)~~ Pursuant to 40 CFR 60.272(b), the visible emissions from the EAF dust handling system shall not exceed **ten percent** (10%) ~~percent~~ opacity, based on a six-minute average.

In Condition D.1.12(a) (formerly D.1.11(b)) the phrase “due solely to the operation of the electric arc furnace” is not in the rule cite 40 CFR 60.272(a)(2). 40 CFR 60.275 specifically addressed this issue by specifying the stack test methods and providing for a means of measuring EAF emissions only. Therefore, this permit is not revised as a result of this comment.

Comment 46

D.1.12 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 the EAFs (# 1control devices for the EAF baghouse Stack 01;and ~~#2),~~

continuous casters (#1 and #2), ~~silos and associated control devices~~. [SILOS ARE VERY SMALL EMISSION UNITS THAT DO NOT NEED A PMP.]

Response to Comment 46

Condition D.1.12 is renumbered D.1.13.

The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the EAFs and Continuous casters because lack of proper maintenance on the EAFs and Continuous casters can result in increased emissions.

D.1.~~12~~ **13**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 the EAFs**,** ~~(#1 and #2)~~, continuous casters (#1 and #2), ~~silos~~ and associated control devices.

Comment 47

D.1.13 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) ~~Within 36~~ No later than 60 months after ~~issuance~~ the effectiveness of this Part 70 permit, in order to demonstrate compliance with Conditions D.1.2(b), the Permittee shall perform PM/PM10 testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C .10 Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five 5) years from the date ~~of this valid~~ compliance ~~demonstration~~. Is demonstrated. TITLE V DOES NOT AUTHORIZE ADDING SUBSTANTIVE REQUIREMENTS.

(b) ~~Within 36~~ No later than 60 months after ~~issuance~~ the effectiveness of this Part 70 permit, in order to demonstrate compliance with Conditions D.1.3(a), the Permittee shall perform NOx testing on the EAF Stack 01, utilizing methods as approved by the Commissioner in accordance with Section C .10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five 5) years from the date ~~of this valid~~ compliance ~~demonstration~~. Is demonstrated.

(c) ~~Within 36~~ No later than 60 months after ~~issuance~~ the effectiveness of this Part 70 permit, in order to demonstrate compliance with Condition D.1.4(a) and (b), the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C.10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five 5) years from the date ~~of this valid~~ compliance ~~demonstration~~. Is demonstrated.

(d) ~~Within 36~~ No later than 60 months after ~~issuance~~ the effectiveness of this Part 70 permit,

in order to demonstrate compliance with Conditions D.1.5, the Permittee shall perform CO testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C .10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five 5) years from the date ~~of this valid~~ compliance ~~demonstration~~. Is demonstrated.

(e) ~~Within 36~~ No later than 60 months after ~~issuance~~ the effectiveness of this Part 70 permit, in order to demonstrate compliance with Conditions D.1.6(b), the Permittee shall perform VOC testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five 5) years from the date ~~of this valid~~ compliance ~~demonstration~~. Is demonstrated.

Response to comment 47

Condition D.1.13 is renumbered D.1.14.

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance, therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness".

326 IAC 2-7-6(1) and 326 IAC 2-1.1- provide IDEM the authority to require compliance testing conditions as necessary to assure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the performance testing section of the permit. The EAFs are large units that need to be periodically tested to provide reasonable compliance information. Therefore, these units are required by this permit to conduct stack testing more frequently than the smaller units. The testing requirement language is revised to account for past valid testing demonstrations. Therefore the permit is revised as follows:

D.1.~~13~~**14** Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Conditions D.1.2(b), the Permittee shall perform PM/PM_{10} testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C**.9**- Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(b) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Conditions D.1.3(a), the Permittee shall perform NOx testing on the EAF Stack 01, utilizing methods as approved by the Commissioner in accordance with Section C**.9** Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(c) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Condition D.1.4(a) and (b), the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C**.9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(d) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with

Conditions D.1.5, the Permittee shall perform CO testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C**.9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(e) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Conditions D.1.6(b), the Permittee shall perform VOC testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C**.9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

Comment 48

D1.15 CO ~~and VOC~~ Control - (BACT) [326 IAC 2-2]

The Direct Shell Evacuation System shall be in operation at all times the ~~EAF and continuous casters~~ EAFs are in operation in a manner to control CO ~~and VOC~~ emissions. [THE DSE IS NOT A VOC CONTROL DEVICE AND DOES NOT CONTROL CASTER EMISSIONS.]

Response to Comment 48

Condition D.1.15 is renumbered D.1.16.

The Direct Shell Evacuation System does not control continuous casters emissions nor EAF VOC emissions. Therefore, the permit is revised as follows:

D**.**1.~~15~~**16** CO ~~and VOC~~ Control - (BACT) [326 IAC 2-2]

The Direct Shell Evacuation System shall be in operation at all times the EAF**s** ~~and continuous casters~~ are in operation in a manner to control CO ~~and VOC~~ emissions.

Comment 49

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

D.1.16 Visible Emission Observations and Continuous Opacity Monitoring [326 IAC 3-5] [40 CFR 60.273a]

Pursuant to 326 IAC 3-5 and 40 CFR 60.273a, the Permittee shall do the following to demonstrate compliance with Condition D.1.~~10~~ 11(b) :

(a) The Permittee shall ~~install,~~ calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) to measure opacity from the EAFs ~~stack~~ Stack 01 in accordance with 326 IAC 3-5-2 and 3-5-3;

(b) In the event that a breakdown of ~~a~~ the continuous opacity 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~~ the continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, the Permittee must provide one of the following: a calibrated backup COM shall be brought online ~~within~~ no later than four (4) hours ~~of~~ after shutdown of the primary COM, ~~if possible. If this is not possible~~, or visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of ~~one (1) hour~~ three (3) six minute

periods beginning the later of: four (4) hours after the start of the ~~malfunction or~~ down time.

~~(1) If the reading period begins less than one hour before sunset~~, or when valid Method 9 readings ~~shall~~ may be ~~performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight~~. observed. If Method 9 observations are used to fulfill the requirements of this subsection, then:
[DOES NOT CONFORM TO EPA METHOD 9 GUIDELINES.]

(2) Method 9 opacity readings shall be repeated for a minimum of ~~one (1) hour~~ three (3) six-minute periods at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(3) All of the opacity ~~readings~~ excursions during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.

~~(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, 40 CFR 60 Subpart AAa and CP 033-8091-00043.~~

Response to Comment 49

Condition D.1.16 is renumbered D.1.17.

The reference to the visible emission limit condition is revised and since the COM is already installed the condition is changed.

Upon further review, IDEM has determined that no additional monitoring will be required during COM downtime, until the COM has been down for twenty-four (24) hours. This allows the Permittee to focus on the task of repairing the COM during the first twenty-four (24) hour period. After twenty-four (24) hours of COM downtime, the Permittee will be required to conduct Method 9 readings for thirty (30) minutes. Once Method 9 readings are required to be performed, the readings should be performed twice per day at least 4 or 6 hours apart, rather than once every four (4) hours, until a COMS is back in service. Therefore, the permit is revised as follows:

D.1.~~16~~**17** Visible Emission Observations and Continuous Opacity Monitoring [326 IAC 3-5] [40 CFR 60.273a]

Pursuant to 326 IAC 3-5 and 40 CFR 60.273a, the Permittee shall do the following to demonstrate compliance with Condition ~~D.1.10~~ **D.1.11**:

(a) The Permittee shall ~~install,~~ calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) **and related equipment.** ~~to measure opacity from the EAFs Stack 01 in accordance with 326 IAC 3-5-2 and 3-5-3;~~

(b) All COMs shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.

(c)~~(b)~~ In the event that a breakdown of a ~~continuous opacity monitoring system~~ **COMS** occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(d)~~(c)~~ Whenever a ~~continuous opacity monitor~~ COM is malfunctioning or ~~will be~~ **is** down for ~~calibration~~, maintenance, or repairs for a period of ~~four (4) hours~~ **twenty-four (24) hours** or more**, and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS,** ~~a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time compliance with the applicable opacity limits shall be demonstrated by the following:~~

~~(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight~~. **the Permittee shall provide a certified opacity reader~~(s)~~, who may be an employee~~s~~ of the Permittee or an independent contractor~~s~~, to self-monitor the emissions from the emission unit stack.**

~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.~~

(1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.

(3) ~~All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports~~**. Method 9 readings may be discontinued once a COMS is online.**

(4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

(e)~~(d)~~ Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 **and** 40 CFR 60**.** ~~Subpart AAa and CP 033-8091-00043.~~

Comment 50

D.1.17 ~~Visible Emission Notations~~

~~(a) Pursuant to~~ [WHY IS THIS HERE WHEN (a) MAKES IT MANDATORY?] [THE PERMIT CITED (CP 033-9187-00043, ~~issued March 24, 1998, visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal~~) IS FOR THE LMF AND IDI RAILCAR UNLOADING FACILITY. OMIT THIS CONDITION D.1.18 Parametric Monitoring

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or~~

~~expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained~~ The Permittee shall record the total static pressure drop across the baghouse used in conjunction with EAFs at least once per day when the EAFs are in operation, when for any one reading the pressure drop across the baghouse is outside the normal range established in the ~~in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The~~ Compliance Response Plan ~~for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.~~ , the Permittee shall take reasonable response steps in accordance with Section C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the range established in the Compliance Response Plan 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 deviation from this permit.

Response to Comment 50

Condition D.1.17 is renumbered D.1.18.

The permit reference is changed to reflect the correct construction permit for the melt shop at SDI, rather than the equipment at IDI.

Also, upon further review, IDEM has determined that once per day monitoring of the visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, the permit is revised as follows:

D.1.~~17~~**18** Visible Emission Notations

(a) Pursuant to CP ~~033-9187-00043, issued March 24, 1998,~~ **CP033-8091-00043, issued June 25, 1997,** visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If** abnormal emission**s** ~~is~~ **are** observed, **the Permittee**

shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C**.16** - ~~Compliance Response Plan – Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

Comment 51

~~D.1.18 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the EAFs at least once per shift when the EAFs are in operation, when for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

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

Response to Comment 51

Condition D.1.18 is renumbered D.1.19.

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The baghouse must operate properly in order for the EAFs to achieve compliance therefore, it is reasonable and necessary to require the source to monitor the baghouse periodically.

Upon further review, IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

The specific reference numbers for Section C requirements have been added to this permit. Therefore, the permit is revised as follows:

D.1.~~18~~ **19** Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the baghouse used in conjunction with the EAFs at least once per ~~shift~~ **day** when the EAFs are in operation, when for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C**.16**- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances.** A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C**.16**- ~~Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C**.13** - ~~Pressure Gauge and Other~~ Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 52

~~D.1~~.19 Baghouse Inspections
[CITATION OR OMIT THIS CONDITION]

An inspection shall be performed ~~each calendar quarter~~ annually of all bags controlling the EAFs and continuous casters. ~~Inspections required by this condition shall not be performed in consecutive months.~~ All defective bags shall be replaced or repaired. The inspection is not required if a bag leak detection system is installed.

Response to Comment 52

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit.

~~D.1.19 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the EAFs and continuous casters. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

Comment 53

D.1.20 Broken or Failed Bag Detection
[CITATION OR OMIT THIS CONDITION]

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units~~

~~and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

[NOT APPLICABLE – NOT A SINGLE COMPARTMENT BAGHOUSE.]

Response to Comment 53

After further review, IDEM determined that for baghouses equipped with a COM, additional monitoring of the baghouse for broken bags/failure is not really necessary. The broken or failed bag detection condition is removed. Subsequent conditions are renumbered as needed. This permit is revised as follows:

~~D.1.20 Broken or Failed Bag Detection~~

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C**.17** - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B**.12** - Emergency Provisions).~~

Comment 54

D.1.21 Monitoring of Operations [40 CFR 60.274a]

Pursuant to CP 033-8091-00043 and 40 CFR 60.274a, the Permittee shall comply with the following monitoring requirements for the EAF baghouse:

(a) Except as provided under item (c) of this condition, the Permittee shall check and record on a once-per-shift basis the furnace static pressure and either:

(1) check and record the control system fan motor amperes and damper positions on a once-per-shift basis; or

(2) install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or

(3) install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and records damper positions on a once-per-shift basis.

The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring device(s) shall have an accuracy of ± 10 percent over its normal operating range and shall be calibrated according to the manufacturer's instructions. The IDEM, OAQ, or the U.S. EPA may require the Permittee to demonstrate the accuracy of the monitoring device(s) relative to Methods 1 and 2 of 40 CFR Part 60, Appendix A.

(b) ~~When the Permittee is required to demonstrate compliance with the standard in condition D.1.11 and at any other time IDEM, OAQ, or the U.S. EPA may require, that either~~ Either the control system fan motor amperes and all damper positions or the volumetric flow rate through each separately ducted hood shall be determined during all periods in which a hood is operated for the purpose of capturing emissions from either electric arc furnace.

(c) The Permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.

~~(d) The Permittee shall install, calibrate, and maintain a monitoring device that allows the pressure in the free space inside the electric arc furnaces to be monitored. The monitoring device may be installed in any appropriate location in the electric arc furnaces or DEC duct prior to the introduction of ambient air such that reproducible results will be obtained. The pressure monitoring device shall have an accuracy of ± 5 millimeter of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.~~

[NOT APPLICABLE _ NO ROOF MONITORS FOR THE EAF.]

~~(e) The pressure in the free space inside the electric arc furnaces shall be determined during the melting and refining period(s) using the monitoring device required under item (d) of this condition. The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the electric arc furnaces are operating in a meltdown and refining period.~~

[NOT APPLICABLE _ NO ROOF MONITORS FOR THE EAF.]

Response to Comment 54

Condition D.1.21 is renumbered D.1.20.

An EPA clarification regarding the Monitoring Requirements in 40 CFR 60, Subpart AAa: Standards of Performance for Steel Plants: Electric Arc Furnaces, was addressed in a letter dated October 2, 1996. The EPA determined based upon an EPA Headquarters determination dated February 11, 1992, the presence of a canopy hood and/or building enclosure around an EAF does not exempt a company from the requirements to monitor excess emissions according to the provisions in Subpart AAa, specifically the requirements found in 40 CFR 60.274a, Monitoring of Operations, which was amended on March 2, 1999. IDEM, OAQ adopted this amended federal regulation by reference into 326 IAC 12-1 on July 1, 2000.

A new item (e) is added because 40 CFR 60.273a Emissions Monitoring was amended on March 2, 1999 to include monitoring of opacity by a certified observer for Electric Arc Furnaces equipped with DEC (Direct-shell Evacuation Control) systems not required to have a static pressure monitoring device. IDEM, OAQ, also adopted this federal regulation by reference into 326 IAC 12-1 on July 1, 2000.

The name of the equipment was added to clarify what equipment is being monitored. Therefore the permit is revised as follows:

D.1.~~21~~ **20**Monitoring of Operations [40 CFR 60.274a] **[40 CFR 60.273a]**

Pursuant to CP 033-8091-00043 and 40 CFR 60.274a, the Permittee shall comply with the following monitoring requirements **for the EAF**:

(a) Except as provided under item (c) of this condition, the Permittee shall check and record on a once per shift basis the furnace static pressure **if the DEC system is in use, and a furnace static pressure gauge is installed according to Condition D.1.19(d)** and either**:**

(1) check and record the control system fan motor amperes and damper positions on a once-per-shift basis;

(2) calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or

(3) calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet **and checks** and records damper positions on a once-per-shift basis.

The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result.

The flow rate monitoring device(s) shall have an accuracy of ± 10 percent over its normal operating range and shall be calibrated according to the manufacturer's instructions.

The IDEM, OAQ, or the U.S. EPA may require the Permittee to demonstrate the accuracy of the monitoring device(s) relative to Methods 1 and 2 of 40 CFR Part 60, Appendix A.

(b) ~~When t~~ **T**he Permittee **of an EAF** ~~is required to demonstrate compliance with the standard in condition D.1.11 and at any other time IDEM, OAQ, or the U.S. EPA may require~~, shall determine either:

(1) the control system fan motor amperes and all damper positions or
(2) the volumetric flow rate through each separately ducted hood

during all periods in which a hood is operated for the purpose of capturing emissions from the EAFs.

(c) The Permittee shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e., pressure sensors, dampers, and damper switches).

This inspection shall include observations of the physical appearance of the equipment (e.g., presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed.

(d) **Except as provided under item (f) of this condition, if emissions during any phase of the heat time are controlled by the use of a DEC system,** the Permittee shall ~~install~~, calibrate, and maintain a monitoring device that allows the pressure in the free space inside the EAF to be monitored. **The pressure shall be recorded as 15-minute integrated averages.**

The monitoring device may be installed in any appropriate location in the EAF or DEC duct prior to the introduction of ambient air such that reproducible results will be obtained.

The pressure monitoring device shall have an accuracy of ± 5 millimeter of water gauge over its normal operating range and shall be calibrated according to the manufacturer's instructions.

(e) Except as provided under item (f) in this condition, when the Permittee is required to demonstrate compliance with the standard under Condition D.1.11(b) and at any other time the U.S. EPA may require under Section 114 of the CAA, the pressure in the free space inside the EAF shall be determined during the melting and refining period(s) using the monitoring device required under item (d) of this condition.

The pressure determined during the most recent demonstration of compliance shall be maintained at all times when the EAF is operating in a meltdown and refining period.

(f) Pursuant to 40 CFR 60.273a(d), a furnace static pressure monitoring device is not required on any EAF equipped with a DEC system if observations of the shop opacity are performed by a certified visible emission observer as follows:

(1) Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period.

(2) Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9.

(3) Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required.

(4) In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident.

Comment 55

D.1.22 Record Keeping Requirements [40 CFR 60.276a]

(a) To demonstrate compliance with Conditions D.1.2 through D.1.11, the Permittee shall maintain a log of information necessary to document compliance with the ~~BACT~~ emission limits of the following:

(1) The ~~throughput~~, Melt Shop natural gas usage and opacity emission records ~~for the melt shop operations EAFs, LMS, and tundish operations combustion units.~~

(2) The inspection and maintenance of emission control equipment as set forth in

the ~~operation and~~ preventive maintenance program.

~~(3) All transactions involved with implementation of the scrap management plan.~~

(4) These records shall be kept for a five (5) year period and made available upon request.

~~(b) To document compliance with operation condition D.1.16, the Permittee shall maintain records:~~ [ALREADY REQUIRED UNDER SECTION C.21.]

~~(1) required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA., if so requested or required.~~

~~(2) of visible emission readings at the melt shop stack and make available upon request to IDEM, OAQ, and the U.S. EPA.~~

~~(c) To document compliance with Condition D.1.17, the Permittee shall maintain records of visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors once per shift.~~

(d) To document compliance with Condition D.1.18, the Permittee shall maintain records once per shift of the total static pressure drop during normal operation.

(e) To document compliance with Condition D.1.19, the Permittee shall maintain records of the results of the inspections required under Condition D.1.19.

(f) To document compliance with Condition D.1.12, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

~~(g) Pursuant to 40 CFR 60.276a, records of the measurements required in 40 CFR 60.274a, as also required in condition D.1.~~ [SEE (h) BELOW.]

(h) All records shall be maintained in accordance with Section C.21, ~~must be retained for at least 5 years following the date of the measurement.~~

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

Response to Comment 55

Condition D.1.22 is renumbered D.1.21.

To clarify and delete duplicate record keeping the D.1.21(a) is revised as follows:

Since IDEM changed the frequency of VE notations and parametric monitoring to once per day the record keeping requirements in D.1.21(c) and (d) are revised to reflect the change.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.1.20(e) has been removed.

Since IDEM deleted the baghouse inspection condition, the requirement to keep records of the inspections in condition and D.1.20(f) has been removed.

The specific reference numbers for Section C requirements have been added to this permit and conditions renumbered as necessary. Therefore the permit is revised as follows:

D.1.~~22~~ **21**Record Keeping Requirements [40 CFR 60.276a]

(a) To demonstrate compliance with Conditions D.1.2 through D.1.~~11~~**12**, the Permittee shall maintain ~~a log of information necessary~~ **records of** ~~to document compliance with the BACT emission limits of the following:~~

~~(1)~~ **t**~~T~~he throughput, natural gas usage and opacity emission records for the melt shop operations ~~EAFs, LMS, and tundish operations combustion units~~.

~~(2) The inspection and maintenance of emission control equipment as set forth in the operation and maintenance program.~~

~~**(2)**(3) All transactions involved with implementation of the scrap management plan.~~

~~**(3)**(4) These records shall be kept for five (5) year period and made available upon request.~~

(b) To document compliance with operation condition D.1.~~16~~ **17**, the Permittee shall maintain records:

(1) required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA., if so requested or required.

(2) of visible emission readings at the melt shop Stack and make available upon request to IDEM, OAQ, and the U.S. EPA.

(c) To document compliance with Condition D.1.~~17~~**18**, the Permittee shall maintain records of visible emission notations of the melt shop building openings, dust handling system and melt shop roof monitors once per ~~shift~~ **day**.

(d) To document compliance with Condition D.1.~~18~~ **19**, the Permittee shall maintain records once per ~~shift~~ **day** of the ~~total static~~ pressure drop during normal operation.

~~(e) To document compliance with Condition D.1.19, the Permittee shall maintain records of the results of the inspections required under Condition D.1.19.~~

~~(f) To document compliance with Condition D.1.12, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(g)~~ **(e)** Pursuant to 40 CFR 60.276a, records of the measurements required in 40 CFR 60.274a, as also required in condition D.1.~~21~~ **20**, must be retained for at least 5 years following the date of the measurement.

~~(h)~~ **(f)** All records shall be maintained in accordance with Section C**.19** - General Record Keeping Requirements, of this permit.

Comment 56

D.1.23 Reporting Requirements [40 CFR 60.276a]

(a) The Permittee shall submit to IDEM, OAQ a quarterly excess emissions report, if applicable, based on the continuous opacity monitor (COM) data, pursuant to 326 IAC 3-5-7. These reports shall be submitted ~~within~~ no later than thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C**.20** - General Reporting Requirements of this permit.

(b) Pursuant to 40 CFR 60.276a, the Permittee shall comply with the following reporting requirements:

(1) The Permittee shall submit a semi-annual written report of exceedances of the control device opacity to IDEM, OAQ, and the U.S. EPA.
Submission of the quarterly opacity report in subsection (a) above or the Quarterly Deviation and Compliance Monitoring Report will satisfy this requirement.

(2) The Permittee shall submit semi-annually any ~~values that exceed furnace static pressure established under 40 CFR 60.274a(g) and values~~ of control system fan motor amperes that exceed 15 percent of the value established under 40 CFR 60.274a(c) or values of flow rates lower than those established under 40 CFR 60.274a(c) to IDEM, OAQ, and the U.S. EPA.

(3) The Permittee shall furnish to IDEM, OAQ, ~~and the U.S. EPA~~ a written report of the results of the compliance emission test required to determine compliance with conditions D.1.1 ~~and D.~~.

(c) The report submitted by the Permittee under paragraphs (b) (~~1.11 This report shall include the following information:~~

~~(A) Facility name and address;~~

~~(B) Plant representative;~~

~~(C) Make and model of process, control device, and continuous monitoring equipment;~~

~~(D) Flow diagram of process and emissions capture equipment including other equipment or process(es) ducted to the same control device;~~

~~(E) Rated (design) capacity of process equipment;~~

~~(F) The following operating conditions:~~

~~(i) List of charge and tap weights and materials;~~

~~(ii) Heat times and process log;~~

~~(iii) Control device operation log; and~~

~~(iv) Continuous monitor or Reference Method 9 data.~~

~~(G) Test dates and test times;~~

~~(H) Test company;~~

~~(I) Test company representative;~~

~~(J) Test observers from outside agency;~~

~~(K) Description of test methodology used, including any deviation from standard reference methods;~~

~~(L) Schematic of sampling location;~~

~~(M) Number of sampling points;~~

~~(N) Description of sampling equipment;~~

~~(O) Listing of sampling equipment calibrations and procedures;~~

~~(P) Field and Laboratory data sheets;~~

~~(Q) Description of sample recovery procedures;~~

~~(R) Sampling equipment leak check results;~~

~~(S) Description of quality assurance procedures;~~

~~(T) Description of analytical procedures;~~

~~(U) Notation of sample blank corrections; and~~

~~(V) Sample emission calculations.~~

(~~c~~) ~~The report submitted by the Permittee~~ (b)(2) does require ~~the~~ certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response to Comment 56

Condition D.1.23 is renumbered D.1.22.

The semi-annual NSPS report as required in condition D.1.21(b) is a separate report from the quarterly deviation and monitoring report. Submission of the quarterly deviation and monitoring report may not satisfy the NSPS semi-annual report. The requirements in D.1.21(b)(3) are deleted since this is a report required for performance testing and protocol and it is addressed during the performance testing required in Condition D.1.13. In paragraph (a), the word "within" has been replaced with "no later than" to more closely match the rule. Therefore, the permit is revised as follows:

D.1.~~23~~**22**Reporting Requirements [40 CFR 60.276a] **[326 IAC 3-5-7]**

(a) The Permittee shall submit **to IDEM, OAQ,** a quarterly excess emissions report, if applicable, based on the continuous opacity monitor (COM) data, pursuant to 326 IAC 3-5-7. These reports shall be submitted ~~within~~ **no later than** thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit.

(b) Pursuant to 40 CFR 60.276a, the Permittee shall comply with the following reporting

requirements:

(1) The Permittee shall submit a semi-annual written report of exceedances of the control device opacity to IDEM, OAQ, and the U.S. EPA.

(2) The Permittee shall submit semi-annually any values that exceed furnace static pressure established under 40 CFR 60.274a(g) and values of control system fan motor amperes that exceed 15 percent of the value established under 40 CFR 60.274a(c) or values of flow rates lower than those established under 40 CFR 60.274a(c) to IDEM, OAQ, and the U.S. EPA.

~~(3) The Permittee shall furnish to IDEM, OAQ, and the U.S. EPA a written report of the results of the compliance emission test required to determine compliance with conditions D.1.1 and D.1.11. This report shall include the following information:~~

~~(A) Facility name and address;~~

~~(B) Plant representative;~~

~~(C) Make and model of process, control device, and continuous monitoring equipment;~~

~~(D) Flow diagram of process and emissions capture equipment including other equipment or process(es) ducted to the same control device;~~

~~(E) Rated (design) capacity of process equipment;~~

~~(F) The following operating conditions:~~

~~(i) List of charge and tap weights and materials;~~

~~(ii) Heat times and process log;~~

~~(iii) Control device operation log; and~~

~~(iv) Continuous monitor or Reference Method 9 data.~~

~~(G) Test dates and test times;~~

~~(H) Test company;~~

~~(I) Test company representative;~~

~~(J) Test observers from outside agency;~~

~~(K) Description of test methodology used, including any deviation from standard reference methods;~~

~~(L) Schematic of sampling location;~~

~~(M) Number of sampling points;~~

~~(N) Description of sampling equipment;~~

~~(O) Listing of sampling equipment calibrations and procedures;~~

~~(P) Field and Laboratory data sheets;~~

~~(Q) Description of sample recovery procedures;~~

~~(R) Sampling equipment leak check results;~~
~~(S) Description of quality assurance procedures;~~

~~(T) Description of analytical procedures;~~

~~(U) Notation of sample blank corrections; and~~

~~(V) Sample emission calculations.~~

(c) The report**s** submitted by the Permittee do~~es~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 57

D.2.1 Particulate Limitation (PM/PM-10) - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), filterable PM**/**PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to ~~stack~~ Stack 61.

(b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), filterable PM**/**PM-10 emissions from the LMF ~~stack~~ Stack 61 shall not exceed 0.0032 grains per dry standard cubic foot. ~~At a maximum air flow rate of 200,000 standard cubic feet per minute, this~~ This limit is equivalent to 5.49 pounds of filterable PM/PM-10 per hour.

Response to Comment 57

The PM/PM10 emission limits as stated in Condition D.2.1 are taken verbatim from the construction permit CP 033-9187-00043. This construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. However, the "s" in stack was capitalized in D.2.1(a) and throughout the permit where necessary.

D.2.1 Particulate Limitation (PM/PM-10) - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), PM**/**PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to **S**~~s~~tack 61.

Comment 58

D.2.2 Nitrogen Oxides (NO_x) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043 and 326 IAC 2-2 (PSD - Control Technology Review; requirements), the NOx emissions from the LMF ~~stack~~ Stack 61 shall not exceed 0.025 pounds per ton. ~~At a maximum process throughput of 400 tons per hour, this~~ This limit is equivalent to 10 ~~pounds of~~ pounds of NOx emissions per hour.

Response to Comment 58

The NOx emission limits as stated in Condition D.2.2 and language are taken verbatim from the construction permit CP 033-9187-00043. This construction permit and amendment was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

D.2.2 Nitrogen Oxides (NO_x) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043 and 326 IAC 2-2 (PSD - Control Technology Review; requirements), the NOx emissions from the LMF **S**~~s~~tack 61 shall not exceed 0.025 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 10 pounds of NOx emissions per hour.

Comment 59

D.2.3 Sulfur Dioxide (SO_2) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF ~~stack~~ Stack 61 and the existing EAFs ~~(#1 and #2) stack~~ Stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton ~~of steel produced. At a maximum process throughput of 400 tons per hour, this~~ This limit is equivalent to 80 pounds of SO_2 per hour.

Response to Comment 59

In Condition D.2.3 the SO_2 emission limits as stated in this condition are the limits and language taken verbatim from the construction permit CP 033-9187-00043. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. However, the EAFs description is revised in Condition D.2.3 and throughout the permit as necessary.

D.2.3 Sulfur Dioxide (SO_2) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF Stack 61 and the existing EAFs ~~(#1 and #2)~~ **S**~~s~~tack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 80 pounds of SO_2 per hour.

Comment 60

D.2.4 Carbon Monoxide (CO) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), CO emissions from LMF ~~stack~~ Stack 61 shall not exceed 0.1 pounds per ton ~~of steel produced. At a maximum process throughput of 400 tons per hour, this~~ This limit is equivalent to 40 pounds of CO per hour.

Response to Comment 60

In Condition D.2.4 the CO emission limits as stated in this condition are the limits and language taken verbatim from the construction permit CP 033-9187-00043. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process.

Therefore the permit is not revised as a result of this comment. However, the EAFs description is revised in Condition D.2.4 and throughout the permit as necessary.

D.2.4 Carbon Monoxide (CO) - Best Available Control Technology [326 IAC 2-2]

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), CO emissions from LMF **S**~~s~~tack 61 shall not exceed 0.1 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 40 pounds of CO per hour.

Comment 61

D.2.5 VOC Emissions Limitations (326 IAC 2-2) (PSD)

Pursuant to CP 033-9187-00043, issued March 24, 1998, VOC emissions from the LMF ~~stack~~ Stack 61 shall not exceed 0.013 pounds per ton. ~~At a maximum process throughput of 400 tons per hour, this~~ This limit is equivalent to 5.21 pounds of VOC per hour. Compliance with this condition makes 326 IAC 2-2 not applicable.

Response to Comment 61

In Condition D.2.5 the VOC emission limits as stated in this condition are the limits and language taken verbatim from the construction permit CP 033-9187-00043. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. However, the EAFs description is revised in Condition D.2.5 and throughout the permit as necessary Therefore the permit is not revised as a result of this comment.

D.2.5 VOC Emissions Limitations (326 IAC 2-2) (PSD)

Pursuant to CP 033-9187-00043, issued March 24, 1998, VOC emissions from the LMF **S**~~s~~tack 61 shall not exceed 0.013 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 5.21 pounds of VOC per hour. Compliance with this condition makes 326 IAC 2-2 not applicable.

Comment 62

D.2.6 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse ~~stack~~ Stack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

~~(b) Pursuant to~~ [CANNOT FIND THIS CONDITION IN CP 033-9187-~~00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions escaping the capture hoods for the LMF shall be minimized by operating the fan associated with the LMF baghouse according to manufacturer specifications such that the capture efficiency of the hood is maximized.]~~

Response to Comment 62

The requirements of Condition D.2.6(b) are taken directly from Condition 11 in CP 033-9187-00043, but with a rule reference to 326 IAC 2-1-3(i)(8). The CP 033-9187-00043 was issued under 326 IAC 2-1-3(i)(8), which was the applicable construction permit rule of authority until it was repealed November 25, 1998. Therefore the permit is revised as follows:

D.2.6 Visible Emission Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse **S**~~s~~tack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(b) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD -Control Technology Review; Requirements), visible emissions escaping the capture hood for the LMF shall be minimized by operating the fan associated with the LMF baghouse according to manufacturer specifications such that the capture efficiency of the hood is maximized.

Comment 63

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit is required for the ~~LMSs, and~~ LMF ~~and associated~~ control devices.

Response to Comment 63

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

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

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

Many types of facilities require maintenance in order to prevent excessive emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the LMFs themselves because lack of proper maintenance on the LMFs can result in poor performance of this equipment, which results in increased emissions. Therefore, the permit is not revised as a result of this comment. Since the Ladle Metallurgical Facility (LMF) includes the Ladle Metallurgical Stations (LMSs) as well as the stir stations, the permit is revised as follows:

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** - Preventive Maintenance Plan, of this permit is required for the ~~LMSs, and~~ LMF and **the** associated control device~~s~~.

Comment 64

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) ~~Within 36~~ No later than months after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM/PM10 testing on the LMF ~~stack~~ Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.10- Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five (5) years from the date ~~of this valid~~ compliance ~~demonstration.~~ Is demonstrated.

(b) ~~Within 36~~ No later than after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.2.2, the Permittee shall perform NOx testing on the LMF ~~stack~~ Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five (5) years from the date ~~of this valid~~ compliance ~~demonstration.~~ Is demonstrated.

(c) ~~Within 36~~ No later than after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C.10 - Performance Testing. This test shall be repeated at least once every ~~two and one-half (2.~~ five (5) years from the date ~~of this valid~~ compliance ~~demonstration.~~ Is demonstrated.

~~(d) Within 36 after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.4, the Permittee shall perform CO testing on the LMF stack 61 utilizing methods as approved by the Commissioner in accordance with Section C - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.~~

~~(e) Within 36 months after issuance of this Part 70 permit, in order to demonstrate compliance with Conditions D.2.5, the Permittee shall perform VOC testing on the LMF stack 61 utilizing methods as approved by the Commissioner in accordance with Section C - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration~~. [CO AND VOC TESTING NOT JUSTIFIED GIVEN LMF'S ROLE IN PRODUCTION.]

Response to Comment 64

After further review, IDEM determined for consistency the LMS stack testing is conducted every 2.5 years as with all other LMS at the other Indiana SDI facilities and the testing requirements for VOC and CO are included in the permit. The testing requirement language is revised to account for past valid testing demonstrations. Therefore the permit is revised as follows:

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

(a) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform PM/PM10 testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.9- Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(b) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with

Condition D.2.2, the Permittee shall perform NOx testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C.**9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(c) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform simultaneous, SO2 testing on the EAF Stack 01 and LMF Stack 61, utilizing methods as approved by the Commissioner in accordance with Section C.**9** - Performance Testing. This test shall be repeated at least once two and one-half (2.5) years from the date of this valid compliance demonstration.

(d) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to demonstrate compliance with Conditions D.2.4, the Permittee shall perform CO testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C**.9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

(e) Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and**, in order to demonstrate compliance with Condition

+s D.2.5, the Permittee shall perform VOC testing on the LMF Stack 61 utilizing methods as approved by the Commissioner in accordance with Section C**.9** - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

Comment 65

~~D.2.10 Visible Emission Notations~~

~~(a) Pursuant to CP 033-9187-00043, issued March 24, 1998, visible emission notations of the LMF Baghouse stack 61 exhaust, shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

Response to Comment 65

The visible emission notations requirement in Condition D.2.10 was not removed from the permit, because the requirement to perform VE notations in Condition D.2.10 is language taken verbatim from Condition 37 in CP 033-9187-00043, issued March 24, 1998. Additionally, compliance monitoring requirements, such as the requirement to perform visible emissions notations, are necessary to ensure that all reasonable information is available to evaluate continuous compliance with the particulate limits in the permit. Therefore, the permit is not revised as a result of this comment. The visible emission notations record keeping requirement in D.2.12(a) is also not removed.

Upon further review, IDEM has determined that once per day monitoring of the visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

The specific reference numbers for Section C requirements have been added to this permit. Therefore the permit is revised as follows:

D.2.10 Visible Emission Notations

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998, visible emission notations of the LMF Baghouse Stack 61 exhaust, shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If** abnormal emission**s** ~~is~~ **are** observed, **the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances**. Failure to take response steps in accordance with Section C**.16** - ~~Compliance Response Plan - Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation from this permit.

Comment 66

~~D.2.11 Parametric Monitoring~~

~~The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the LMF at least once per shift when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be~~

~~considered a deviation from this permit.~~

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

D.2.11 Parametric Monitoring [[NO REGULATORY AUTHORITY]

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the LMF at least once per day when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range established in the Compliance Response Plan , the Permittee shall take reasonable response steps in accordance with Section C.18 – Compliance Response Plan – Preparation, Implementation, Records and Reports. A pressure reading that is outside the range established in the Compliance Response Plan is not a deviation from this permit. Failure to take response steps in accordance with Section C.18 - Compliance Response Plan – Preparation, Implementation, Records and Reports shall be considered a deviation from this permit.

Response to Comment 66

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to ensure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The scrubber must operate properly in order for the LMF to achieve compliance; therefore, it is reasonable and necessary to require the source to monitor the scrubber periodically.

Upon further review, IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

The specific reference numbers for Section C requirements has been added to this permit. Therefore the permit is revised as follows:

D.2.11 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the baghouse used in conjunction with the LMF at least once per ~~shift~~ **day** when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with Section C**.16** - ~~Compliance Response Plan – Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C**.16** - ~~Compliance Response Plan – Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C**.13** - ~~Pressure Gauge and Other~~ Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

Comment 67

~~D.2.12 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the LMS.~~

~~Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

D.2.12 Baghouse Inspection [CITATION OR OMIT THIS CONDITION]

An inspection shall be performed annually of all bags controlling the LMS. All defective bags shall be replaced or repaired. The inspection is not required if a bag leak detection system or COM is installed.

Response to Comment 67

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit.

~~D.2.12 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the LMS. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

Comment 68

~~D.2.13 Broken or Failed Bag Detection~~

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

[NO REGULATORY AUTHORITY]

D.2.13 Broken or Failed Bag Detection [CITATION OR OMIT THIS CONDITION]

In the event that bag failure has been observed, the Compliance Response Plan shall be initiated in accordance with Section C.17- Compliance Response Plan –Preparation, Implementation, Records and Reports.

[NOT APPLICABLE –NOT A SINGLE COMPARTMENT BAGHOUSE]

Response to Comment 68

Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.2.9 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

Paragraph (b) of the Broken or Failed Baghouse condition has been deleted since the baghouses associated with the equipment in Section D.2 are not single compartment baghouses.

Therefore the permit is revised as follows:

D.2.13 Broken or Failed Bag Detection

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

D.2.9 Particulate Control – (BACT) [326 IAC 2-2] **[326 IAC 2-7-6(6)]**

(a) **Pursuant to 326 IAC 2-2**, the LMF baghouse shall be operated at all times when the LMSs, and stir stations are in operation.

(b) **In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the**

IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Comment 69

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

D.2.14 Record Keeping Requirements

~~(a) To document compliance with Condition D.2.10, the Permittee shall maintain records of visible emission notations of the LMF stack 61 exhaust once per shift.~~

(b) To document compliance with Condition D.2.11, the Permittee shall maintain records once per shift of the ~~total static~~ pressure drop during normal operation.

(c) To document compliance with Condition D.2.12, the Permittee shall maintain records of the results of the inspections required under Condition D.2.12.

(d) To document compliance with Condition D.2.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with the Section C.21 General Record Keeping requirements of this permit.

Response to Comment 69

Condition D.2.14 is renumbered D.2.12.

The visible emission notations requirement in Condition D.2.10 was not removed from the permit, because the requirement to perform VE notations in Condition D.2.10 is language taken verbatim from Condition 37 in CP 033-9187-00043, issued March 24, 1998. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment. Therefore the visible emission notations record keeping requirement in D.2.12(a) is not removed.

Since IDEM changed the frequency of visible emission notations and parametric monitoring to once per day the record keeping requirements in D.2.12 (a) and (b) are revised to reflect the change.

Since IDEM deleted the baghouse inspection condition, the requirement to keep records of the inspections in condition D.2.12(c) has been removed.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.2.12(d) has been removed.

The specific reference numbers for Section C requirements have been added to this permit and conditions renumbered as necessary. Therefore the permit is revised as follows:

D.2.~~14~~ **12**Record Keeping Requirements

(a) To document compliance with Condition D.2.10, the Permittee shall maintain records of the visible emission notations of the LMF Stack 61 exhaust once per ~~shift~~ **day**.

(b) To document compliance with Condition D.2.11, the Permittee shall maintain records

once per ~~shift~~ **day** of the ~~total static~~ pressure drop during normal operation.

~~(c) To document compliance with Condition D.2.12, the Permittee shall maintain records of the results of the inspections required under Condition D.2.12.~~

~~(d) To document compliance with Condition D.2.7, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(e)~~ **(c)** All records shall be maintained in accordance with the Section C**.19** General Record Keeping requirements of this permit.

Comment 70

D.3.1 Nitrogen Oxides (NOx) - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 1 shall be limited to ~~solely to~~ the use of ~~low NOx~~ natural gas fired burners ~~and shall not exceed 117.9 MMBtu per hour heat input~~ and NOx emissions shall not exceed 0.17 pounds per MMBtu.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), Tunnel Furnace No. 2 heating zone shall be equipped ~~with low~~ NOx natural gas fired burners ~~not exceeding 92 MMBtu per hour heat input~~ and NOx emissions shall not exceed 0.10 pounds per MMBtu. The total emissions per hour shall not exceed 9.2 pounds per hour through ~~stack~~ Stack 42.

Response to Comment 70

Condition D.3.1(a) is language taken verbatim from Condition 16 in CP 033-3692-00043, issued October 7, 1994 and Condition D.3.1(b)) is language taken verbatim from Condition 20 in CP 033-8091-00043, issued June 25, 1997. These construction permits were reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

Comment 71

~~D.3.2 Visible Emissions Limitations - Best Available Control Technology [326 IAC 2-2]~~

~~Pursuant to~~ [CANNOT FIND THE ABOVE CONDITION IN CP 033-8091-00043~~, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from Tunnel furnace stack 2 and Tunnel furnace stack 42, shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9.)~~

Response to Comment 71

The language for Condition D.3.2 is taken verbatim from two construction permits. The opacity limitation for Tunnel Furnace No. 1 (Stack 2) is language taken directly from Condition 23 in CP 033-3692-00043, issued October 7, 1994. Condition 23 in CP 033-3692-00043, states “That visible emissions from any stack, other process emissions, control devices …… shall not exceed five percent opacity, unless specified by above conditions”. An opacity limit is not specified in a separate condition in the CP 033-3692-00043 so Condition 23 applies.

The opacity limitation for Tunnel Furnace No. 2 (Stack 42) is language taken directly from Condition 36 in CP 033-8091-00043, issued June 25, 1997. Condition 36 in CP 033-8091-00043, states “That pursuant to

326 IAC 2-2-3 (BACT), visible emissions from vents, stacks and building roof monitors, unless otherwise specified, shall not exceed three (3%) percent opacity …." An opacity limit for Tunnel Furnace No. 2 (Stack 42) is not specified in a separate condition in CP 033-8091-00043, so Condition 36 applies. The opacity limitations are from two different construction permits, therefore the permit is revised as follows:

D.3.2 Visible Emissions Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2 (PSD-Control Technology Review; Requirements), visible emissions from Tunnel Furnace No. 1 (Stack 2), shall not exceed five percent (5%). The opacity shall be determined by 40 CFR 60, Appendix A, Method 9.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2 (PSD- Control Technology Review; Requirements), visible emissions from ~~Tunnel furnace Stack 2 and~~ Tunnel **F**urnace **No. 2 (**Stack 42**)**, shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9.).

Comment 72

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.11– Preventive Maintenance Plan of this permit is required for the natural gas fired burners Tunnel Furnace No. 1 and Tunnel Furnace No.2.

Response to Comment 72

To clarify what parts of the Tunnel Furnaces require a Preventive Maintenance Plan, the permit is revised as follows:

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.~~11~~**10** – Preventive Maintenance Plan of this permit is required for **the** Tunnel Furnace No. 1 and Tunnel Furnace No.2 **natural gas fired burners**.

Comment 73

Record Keeping and Reporting Requirements

D.3.4 Record Keeping Requirements

(a) To document compliance with Condition D.3.3, the Permittee shall maintain records of ~~A~~any inspections prescribed by the Preventive Maintenance Plan.

(b) All records shall be maintained in accordance with Section C.21 – General Record Keeping Requirements, of this permit.

Response to Comment 73

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.3.4(a) has been removed. Since this item is the only record keeping requirement, Condition D.3.4 is deleted. The permit is revised as follows:

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

~~D.3.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.3.3, the Permittee shall maintain records of **a**Any inspections prescribed by the Preventive Maintenance Plan.~~

~~(b) All records shall be maintained in accordance with Section C**.20** General Record Keeping Requirements, of this permit.~~

Comment 74

Pickle Line Scale Breaker
THIS NEEDS TO BE A SEPARATE SECTION d. IT IS AN ENTIRELY DIFFERENT PROCESS THAN PICKLING, HAS A SEPARATE STACK, A DIFFERENT TYPE OF CONTROL DEVICE, AND A DIFFERENT POLLUTANT.

D.4.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line filterable particulate matter emissions shall be controlled by a scrubber stack and the filterable particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour.

(b) Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker particulate matter ~~PN/~~ PM/PM10 emissions shall be controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf ~~and flow rate of 10, 600 acfm.~~

Response to Comment 74

Condition D.4.1(a) is language taken verbatim from Condition 8 in CP 033-5625-00043, issued August 8, 1996. This construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

The pickle line scale breaker description and requirements have been deleted from Section D.4 and moved to Section D.5 (See IDEM Response to Comment 86), since it is a separate process from the pickling lines. Subsequent D sections have been renumbered as needed. Therefore the permit is revised as follows:

D.4.1 Particulate Matter Emissions Limitations - Best Available Control Technology (BACT)[326 IAC 2-2]

~~(a)~~Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line particulate matter emissions shall be controlled by a scrubber Stack and the particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour.

~~(b) Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker particulate matter PM/PM10 emissions shall controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf and flow rate of 10, 600 acfm~~

Comment 75

D.4.2 Particulate Emission Limitations from Manufacturing Processes (HCl Pickling) [326 IAC 6-3]

Pursuant to CP 033-5625-00043, issued August 8, 1996 ~~and 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes~~ , the hydrochloric acid mist from the pickle line shall be controlled by a scrubber and mist eliminator. Emissions shall not exceed 0.~~04 grams per second and 0~~.32 pounds per hour. [NO NEED FOR TWO SHORT-TERM EMISSION LIMITS][326 IAC 6-

3 IS FOR PARTICULATE, NOT HCL MIST AND DOESN'T APPLY WHERE BACT IS MORE STRINGENT.]

Response to Comment 75

The hydrochloric acid mist emissions limit in condition D.4.2 is based on the Air Quality modeling completed during the construction permit CP033-5625-00043 review process, issued August 8, 1996. The hydrochloric acid mist limit in condition D.4.2 is taken verbatim from condition 9 of the construction permit CP033-5625-00043.

0.04 grams/second x 60 seconds/minute = 2.4 grams/minutes x 60 minutes/hour = 144 grams/hr.
144 grams/hr x 0.00221 lb/gram = 0.32 lb/hr

Therefore, the permit is revised as follows.

D.4.2 ~~Particulate Emission Limitations from Manufacturing Processes (~~ **Hydrochloric Acid (**HCl) Pickling **Emission Limitation**~~) [326 IAC 6-3]~~

Pursuant to CP 033-5625-00043, issued August 8, 1996 ~~and 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes~~, the hydrochloric acid mist from the pickle line shall be controlled by a scrubber and mist eliminator. Emissions shall not exceed ~~0.04 grams per second~~ and 0.32 pounds per hour.

Comment 76

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the pickle line, scrubber and mist eliminator ~~and scale breaker and baghouse.~~ [SCALE BREAKER BAGHOUSE HAS VERY LOW EMISSIONS]

Response to Comment 76

A preventive maintenance plan is required for the scale breaker and associated baghouse because the proper operation of the unit and the associated control device is necessary to ensure compliance with the applicable emission limit. Also see response to comment 87.

The scale breaker requirements have been moved to Section D.5 (See Response to Comment 87). The specific reference number for Section B requirements has been added to this permit. Therefore the permit is revised as follows:

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** - Preventive Maintenance Plan, of this permit, is required for the pickle line, scrubber and mist eliminator ~~and scale breaker and baghouse~~.

D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the scale breaker and baghouse.

Comment 77

D.4.4 Testing Requirements

~~Within 36~~ No later then 60 months after ~~issuance~~ the effectiveness of this Part 70 permit condition, in order to demonstrate compliance with Condition D.4.2, the Permittee shall perform a

hydrochloric acid test on the pickle line ~~stack~~ Stack 17, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date ~~of this valid~~ compliance ~~demonstration.~~ Is demonstrated. Testing shall be conducted in accordance with Section C.10 - Performance Testing.

Response to Comment 77

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness."

The testing requirement language is revised to account for past valid testing demonstrations and the PSD PM limit of the pickle line in Condition D.4.1. Therefore the permit is revised as follows:

D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within ~~36~~ **30** months ~~after issuance of this Part 70 permit,~~ **from the date of the latest compliance demonstration stack test and** in order to comply with condition D.4.2, the Permittee shall perform a hydrochloric acid test on the pickle line ~~s~~**S**tack 17, utilizing methods as approved by the Commissioner **in accordance with Section C.9- Performance Testing.** This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. ~~Testing shall be conducted in accordance with Section C- Performance Testing.~~

Comment 78

D.4.6 Particulate Control– (BACT) [326 IAC 2-2~~-3~~]

The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.

Response to Comment 78

The rule cite has been changed as requested. The scale breaker requirements have been deleted from Section D.4 and moved to Section D.5 (See Response to Comment 88). The subsequent conditions have been renumbered.

~~D.4.6 Particulate Matter Control – (BACT) [326 IAC 2-2]~~

~~The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.~~

D.5.3 Particulate Control– (BACT) [326 IAC 2-2]

The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.

Comment 79

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

~~D.4.7 Visible Emission Notations~~

~~(a) Visible emission notations of the pickle line scale breaker stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere.~~ [NO REGULATORY AUTHORITY.]

[THE SCRUBBER PRODUCES A WET PLUME . VE NOTATION DOESN'T MAKE SENSE WITH WET PLUMES.]

~~A trained employee shall record whether emissions are normal or abnormal.~~

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.~~

Response to Comment 79

The scale breaker requirements have been moved to Section D.5 (See response to Comment 89). The subsequent conditions have been renumbered. Visible emission notation readings on the baghouse are required because 326 IAC 2-7-5 and 326 IAC 2-7-6 provide the authority to require monitoring such that all reasonable information is available to evaluate continuous compliance with the applicable requirements. In this case, particulate emissions are limited pursuant to 326 IAC 2-2 (PSD BACT).

~~D.4.7~~**D.5.4** Visible Emission Notations

(a) Visible emission notations of the pickle line scale breaker Stack exhaust shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) ~~The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If** abnormal emission**s** ~~is~~ **are** observed **the Permittee shall take reasonable response steps in accordance with Section C.16- Response to Excursions or Exceedances**. Failure to take response steps in accordance with Section C**.16** - ~~Compliance Response Plan – Preparation, Implementation, Records and Reports~~ **Response to Excursions or Exceedances** shall be considered a ~~violation of~~ **deviation from** this permit.

Comment 80

D.4.8 Parametric Monitoring
[NO REGULATORY AUTHORITY]

(a) The Permittee shall record the flow rate of the packed scrubber used in conjunction with the Pickling Line, at least once per ~~shift~~ day when the Pickling Line is in operation. When for any one reading, the flow rate of the scrubber is below ~~a minimum of~~ six (6) gallons per minute (gpm) or a minimum flow rate established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports. A flow rate that is ~~outside the above mentioned range~~ below six (6) gallons per minute is not a deviation from this permit. Failure to take response steps in accordance with Section C - .18 - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

~~(b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pickle line scale breaker, at least once per shift when the pickle line scale breaker is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with section C – Compliance Response Plan – Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation and Implementation shall be considered a violation of this permit~~. [SINGLE COMPARTMENT BAGHOUSE – NO PRESSURE GAUGE.]

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

[THERE IS NO REAL UPPER END TO THE FLOW MONITOR, THUS A % OF SCALE CANNOT BE DETERMINED. NOR IS ACCURACY WITHIN SPEC OF C.15.]

Response to Comment 80

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The scrubber must operate properly in order for the pickle line to achieve compliance; therefore, it is reasonable and necessary to require the source to monitor the scrubber periodically.

Upon further review, IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6.

The scale breaker requirements have been moved to Section D.5 (See Response to Comment 90).

D.4.~~8~~**6** Parametric Monitoring

(a) The Permittee shall record the flow rate of the packed scrubber used in conjunction with the Pickling Line, at least once per ~~shift~~ **day** when the Pickling Line is in operation. When for any one reading, the flow rate of the scrubber is below a minimum of six (6) gallons per minute (gpm) or a minimum flow rate established during the latest Stack test, the Permittee shall take reasonable response steps in accordance with ~~Section C.17- Compliance Response Plan - Preparation, Implementation, Records, and Reports~~ **Section C.16 - Response to Excursions or Exceedances**. A flow rate that is ~~outside~~

below the above mentioned ~~range~~ **minimum** is not a deviation from this permit. Failure to take response steps in accordance with ~~Section C.17 - Compliance Response Plan - Preparation, Implementation, Records, and Reports -~~ **Section C.16 - Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

(b) The instrument used for determining the flow rate shall comply with Section C.~~14 –~~ **13** ~~Pressure Gauge and Other~~ Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

Comment 81

D.4.9 Scrubber Failure Detection
[CITATION OR OMIT THIS CONDITION]

In the event, a scrubber failure has been observed:
The Compliance Response Plan shall be initiated in accordance with Section C.18 – Compliance Response Plan – Preparation, Implementation , Records and Reports.

~~Failed units and the associated process will be shut down immediately until the failed units have en repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Emergency Provisions).~~
[WE CANNOT SHUT DOWN THE PROCESS "IMMEDIATELY" DUE TO WORKER EXPOSURE TO HCl FUMES . MUST MAINTAIN FAN OPERATION TO VENT HCl FUMES FROM PROCESS IN ORDER TO ACCESS EQUIPMENT.]

Response to Comment 81

IDEM recognizes that immediate shutdown may not be possible in certain situations, due to safety concerns. Therefore, the permit is revised as follows:

D.4.~~9~~ **7** Scrubber Failure Detection

In the event, a scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B.**11**- Emergency Provisions)**, or if safety concerns prevent immediate shutdown. If safety concerns prevent immediate shutdown, then feed to the associated process will be shut off immediately and the process shall be shutdown as soon as shutdown would be considered safe.**

Comment 82

D.4.10 Scrubber Inspections [CITATION OR OMIT THIS CONDITION]

An inspection shall be performed ~~each calendar quarter~~ annually of the Pickling Line scrubber. ~~Inspections required by this condition shall not be performed in consecutive months.~~

Response to Comment 82

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. The subsequent conditions have been renumbered. The permit is revised as follows:

~~D.4.8 Scrubber Inspections~~

~~An inspection shall be performed each calendar quarter of the Pickling Line scrubber. Inspections required by this condition shall not be performed in consecutive months.~~

Comment 83

D.4.11 Baghouse Inspections
[CITATION OR OMIT THIS CONDITION]

An inspection shall be performed ~~each calendar quarter~~ annually of all bags controlling the pickle line scale breaker ~~operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced or repaired.

D.4.12 Broken or Failed Bag Detection [CITATION OR OMIT THIS CONDITION]

In the event that bag failure has been observed:
The Compliance Response Plan shall be initiated in accordance with Section C.17– Compliance Response Plan – Preparation, Implementation, Records and Reports.

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the~~

[NOT A MULTI-COMPARTMENT BAGHOUSE FOR THE SCALE BREAKER]

Response to Comment 83

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. The subsequent conditions have been renumbered. The permit is revised as follows:

~~D.4.11 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the pickle line scale~~

~~breaker operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

~~D.4.12 Broken or Failed Bag Detection~~

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Comment 84

D.4.13 Mist Eliminator Inspections CITATION OR OMIT THIS CONDITION]

Annual inspections shall be performed on the mist eliminator used in conjunction with the pickling line to ensure proper operation . The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in emissions from the mist eliminator occurs. Failure to take response steps in accordance with Section C.18 Compliance Response Plan, ~~response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -~~ Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. ~~If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been~~

~~repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

~~D.4.13 Mist Eliminator Inspections~~

~~Monthly inspections shall be performed on the mist eliminator used in conjunction with the pickling line and cold reversing mill to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.~~

Response to Comment 84

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit

~~D.4.9 Mist Eliminator Inspections~~

~~Monthly inspections shall be performed on the mist eliminator used in conjunction with the pickling line and cold reversing mill to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C.17 Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.~~

Comment 85

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

D.4.14 Record Keeping Requirements

~~(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per shift visible emissions notation of the scale breaker stack 60 exhaust.~~

(a) To document compliance with Condition D.4.8, the Permittee shall maintain records of the ~~once per shift~~ pickle line scrubber flow rate ~~and pressure drop across the scale breaker baghouse~~ during normal operation.

(c) To document compliance with Conditions D.4.10, D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under ~~Conditions D.4.10, D..4.11 and D.4.13.~~

(d) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C.21 - General Record Keeping Requirements, of this permit.

Response to Comment 85

The scale breaker requirements have been moved to Section D.5 (See Response to Comment 93).

Since IDEM changed the frequency of parametric monitoring to once per day the record keeping requirements in D.4.10(a) is revised to reflect the change.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.4.10(d) has been removed.

Since IDEM deleted the baghouse, scrubber and mist eliminator inspection conditions, D.4.10, D.4.11 and D.4.13, the requirement to keep records of the inspections in condition and D.4.10(c) has also been removed.

The specific reference numbers for Section C requirements have been added to this permit and conditions renumbered as necessary. Therefore the permit is revised as follows:

D.4.~~14~~**10**Record Keeping Requirements

~~(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per shift visible emissions notation of the scale breaker stack 60 exhaust.~~

~~(b)~~ **(a)** To document compliance with Condition ~~D.4.8~~ **D.4.5**. the Permittee shall maintain records of the once per ~~shift~~ **day** pickle line scrubber flow rate ~~and pressure drop across the scale breaker baghouse~~ during normal operation.

~~(c) To document compliance with Conditions D.4.10, D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.10, D.4.11 and D.4.13.~~

~~(d) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(e)~~ **(b)** All records shall be maintained in accordance with Section C**.19** - General Record Keeping Requirements, of this permit.

Comment 86

Pickle Line Scale Breaker
THIS NEEDS TO BE A SEPARATE SECTION d. IT IS AN ENTIRELY DIFFERENT PROCESS THAN PICKLING, HAS A SEPARATE STACK, A DIFFERENT TYPE OF CONTROL DEVICE, AND A DIFFERENT POLLUTANT.

D.4.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line filterable particulate matter emissions shall be controlled by a scrubber Stack and the filterable particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour.

(b) Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker filterable particulate matter ~~PN~~ PM/PM10 emissions shall be controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf ~~and flow rate of 10, 600 acfm~~

Response to Comment 86

Condition D.4.1 is renumbered D.5.1.

The pickle line scale breaker description and requirements have been deleted from Section D.4 and moved to Section D.5, since it is a separate process from the pickling lines. The Table of Contents and subsequent D sections have been renumbered as needed. Therefore, the permit is revised as follows:

D.~~4~~ **5**.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

~~(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the pickle line particulate matter emissions shall be controlled by a scrubber Stack and the particulate matter emissions from Stack 17 shall not exceed 1.23 pounds per hour.~~

~~(b)~~ Pursuant to 326 IAC 2-2 BACT, the pickle line scale breaker particulate matter P~~N~~**M**/PM10 emissions shall **be** controlled by a baghouse with an outlet grain loading of 0.003 gr/dscf and flow rate of 10,600 acfm.

Comment 87

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the pickle line, scrubber and mist eliminator ~~and scale breaker and baghouse.~~ [SCALE BREAKER BAGHOUSE HAS VERY LOW EMISSIONS]

Response to Comment 87

Condition D.4.2 is renumbered D.5.2.

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

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the scale breaker itself because lack of proper maintenance on the scale breaker can result in increased emissions.

The pickle line scale breaker description and requirements have been deleted from Section D.4 and moved to Section D.5, since it is a separate process from the pickling lines. Subsequent D sections have been renumbered as needed. Therefore, the permit is revised as follows:

D.~~4.3~~ **5.2**Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** - Preventive Maintenance Plan, of this permit, is required for the ~~pickle line, scrubber and mist eliminator and~~ scale breaker and baghouse.

Comment 88

Pickle Line Scale Breaker
THIS NEEDS TO BE A SEPARATE SECTION d. IT IS AN ENTIRELY DIFFERENT PROCESS THAN PICKLING, HAS A SEPARATE STACK, A DIFFERENTTYPE OF CONTROL DEVICE, AND A DIFFERENT POLLUTANT.

Response to Comment 88

Condition D.4.6 is renumbered D.5.3.

This scale breaker requirement has been deleted from Section D.4 and moved to Section D.5. The subsequent conditions have been renumbered.

D.~~4.6~~ **5.3Particulate Control– (BACT) [326 IAC 2-2]**

The scale breaker baghouse shall be in operation at all times the scale breaker is in operation to control particulate emissions.

Comment 89

~~D.4.7 Visible Emission Notations~~

~~(a) Visible emission notations of the pickle line scale breaker Stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.~~
NO REGULATORY AUTHORITY

~~(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.~~

~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~

~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~

~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.~~

Response to Comment 89

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The Part 70 permit program is based on the ability of the source to demonstrate continuous compliance with the conditions in this permit. The status of the monitor parameters are necessary to demonstrate continuous compliance with the conditions of the Part 70 permit.

The scale breaker has an applicable particulate emission limit pursuant to 326 IAC 2-2 (PSD BACT). The Part 70 rules provide IDEM the authority to require monitoring such that all reasonable information is necessary to ensure continuous compliance with applicable requirements. Therefore the requirement to perform visible emission notations is required. The permit is not revised as a result of this comment.

Comment 90

D.4.8 Parametric Monitoring
[NO REGULATORY AUTHORITY]

~~(b) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pickle line scale breaker, at least once per shift when the pickle line scale breaker is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with section C – Compliance Response Plan – Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation and Implementation shall be considered a violation of this permit~~. [SINGLE COMPARTMENT BAGHOUSE – NO PRESSURE GAUGE.]

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

[THERE IS NO REAL UPPER END TO THE FLOW MONITOR, THIS A % OF SCALE CANNOT BE DETERMINED. NOR IS ACCURACY WITHIN SPEC OF C.15.]

Response to Comment 90

326 IAC 2-7-5(1) and 326 IAC 2-7-6(1) provide IDEM the authority to require compliance monitoring conditions as necessary to assure that all reasonable information is provided to evaluate continuous compliance with the emission limits. These rule cites are included as part of the title of the compliance monitoring section of the permit. The Part 70 permit program is based on the ability of the source to demonstrate continuous compliance with the conditions in this permit. The status of the monitor parameters is necessary to demonstrate continuous compliance with the conditions of the Part 70 permit.

Comment 91

D.4.11 Baghouse Inspections
[CITATION OR OMIT THIS CONDITION]

An inspection shall be performed ~~each calendar quarter~~ annually of all bags controlling the pickle line scale breaker ~~operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three moompliance Response Plan months thereafter. Inspections are optional when venting to the indoors.~~ All defective bags shall be replaced.

Response to Comment 91

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit.

~~D.4.11 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the pickle line scale breaker. All defective bags shall be replaced.~~

Comment 92

D.4.12 Broken or Failed Bag Detection [CITATION OR OMIT THIS CONDITION]

In the event that bag failure has been observed:
The Compliance Response Plan shall be initiated in accordance with Section C.17 – Compliance Response Plan –Preparation, Implementation, Records and Reports.

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the~~
[NOT A MULTI-COMPARTMENT BAGHOUSE FOR THE SCALE BREAKER

~~Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Response to Comment 92

The permit is revised as follows:

~~D.4.12~~ **5.6**~~Broken or Failed Bag Detection~~

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

~~(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification~~

~~shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).~~

Comment 93

D.4.14 Record Keeping Requirements

~~(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per shift visible emissions notation of the scale breaker stack 60 exhaust.~~

(b) To document compliance with Condition D.4.8, the Permittee shall maintain records of the ~~once per shift~~ pickle line scrubber flow rate ~~and pressure drop across the scale breaker baghouse~~ during normal operation.

(c) To document compliance with Conditions D.4.10, D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under ~~Conditions D.4.10, D.4.11 and D.4.13.~~

(d) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

(e) All records shall be maintained in accordance with Section C.21 - General Record Keeping Requirements, of this permit.

Response to Comment 93

The scale breaker requirements have been deleted from Section D.4 and moved to Section D.5. The subsequent conditions have been renumbered.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.4.14 renumbered D.5.4(a) has been removed. Since this item is the only record keeping requirement, Condition D.5.4 is deleted. The permit is revised as follows:

~~D.4.14 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the once per shift visible emissions notation of the scale breaker stack 60 exhaust.~~

~~(b) To document compliance with Condition D.4.8, the Permittee shall maintain records of the once per shift pickle line scrubber flow rate and pressure drop across the scale breaker baghouse during normal operation.~~

~~(c) To document compliance with Conditions D.4.10, D.4.11 and D.4.13, the Permittee shall maintain records of the results of the inspections required under Conditions D.4.10, D.4.11 and D.4.13.~~

~~(d) To document compliance with Condition D.4.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

Comment 94

D.5.1 Particulate Emission Limitations [326 IAC 6-2-2(a)]

Pursuant to CP 033-5625-00043, issued August 8, 1996 ~~and 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heat),~~ the filterable particulate emissions from the pickle line boilers with ~~a combined heat input of 23.6 MMBtu per hour~~ shall not exceed 0.48 ~~pound~~ pounds per MMBtu heat input. [326 IAC 6-2-1(f) & (g) MAKE 326 IAC 6-2-2 INAPPLICABLE]

Response to Comment 94

Pursuant to 326 IAC 6-2-1(g), if any limitation established by this rule is inconsistent with a limitation contained in a facility's construction permit or operation permit as issued pursuant to 326 IAC 2 concerning permit review regulations, then the limitations contained in the source's current permits prevail. Construction Permit CP 033-5625-00043, issued August 8, 1996 is the current permit the source is operating under and the limit in CP 033-5625-00043 is the same as the limit in 326 IAC 6-2-2.

Pursuant to 326 IAC 6-1-2(f), if any limitation established by 326 IAC 6 (Particulate Rules) is inconsistent with a limitation contained in a facility's construction permit or operation permit as issued pursuant to 326 IAC 12 concerning new source performance standards, then the limitations in 326 IAC 12 prevail. However, in this case, the applicable NSPS for the pickle line boilers does not establish an emission limitation that is inconsistent with the limitation contained in the permit. The only applicable requirement in the NSPS is the requirement to burn natural gas.

Therefore the permit is not revised as a result of this comment.

To show the renumbered Sections and conditions the permit is revised as follows:

D.~~5.1~~ **6.1** Particulate Emission Limitations [326 IAC 6-2-2(a)]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heat), the particulate emissions from the pickle line boilers with a combined heat input of 23.6 MMBtu per hour shall not exceed 0.48 pound per MMBtu heat input.

Comment 95

D.5.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the ~~two~~ pickle line boilers shall not exceed 81 pounds per million cubic ~~foot~~ feet (MMCF) of gas burned.

(b) Pursuant to 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

Response to Comment 95

Condition D.5.2 is renumbered D.6.2 and the typo is corrected. A third backup boiler No. 3 is included in this Part 70 permit per the Supplement to the Technical Support Document. Therefore the permit is

revised as follows:

D.~~5~~ **6**.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the ~~two~~ pickle line boilers shall not exceed 81 pounds per million cubic ~~foot~~ **feet** (MMCF) of gas burned.

(b) Pursuant to 326 IAC 2-2 (BACT), only two of the three boilers Nos. 1, 2 and 3, shall be utilized at any time.

Comment 96

D.5.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the pickle line boilers except when otherwise specified in 40 CFR Part 60, Subpart Dc. [SPECIFY WHICH PARTS OF SUBPART A ARE INAPPLICABLE.]

Response to Comment 96

This is a general condition that states the EPA New Source Performance Standards for the boilers have been incorporated by reference into state rule 326 IAC 12-1. All of the General Provisions in 40 CFR 60, Subpart A apply, except if 40 CFR 60 Subpart Dc, specifies otherwise. Therefore the permit is not revised as result of this comment.

Condition D.5.3 is renumbered D.6.3. Therefore the permit is revised as follows:

D.~~5~~**6**.3 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the pickle line boilers except when otherwise specified in 40 CFR Part 60, Subpart Dc.

Comment 97

D.5.4 Particulate (PM/PM-10) and Sulfur Dioxide (SO2) Limitations (NSPS) [40 CFR 60, Subpart Dc] [326 IAC 12-1]

Pursuant to CP 033-5625-00043, issued August 8, 1996, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial Boilers Commercial-Institutional Steam Generating Boilers) and 326 IAC 12-1, the pickle line boilers shall burn natural gas only in order to minimize particulate and sulfur dioxide emissions.

Response to Comment 97

Condition D.5.4 is renumbered D.6.4. Therefore the permit is revised as follows:

D.~~5~~**6**.4 Particulate (PM/PM-10) and Sulfur Dioxide (SO2) Limitations (NSPS) [40 CFR 60, Subpart Dc] [326 IAC 12-1]

Pursuant to CP 033-5625-00043, issued August 8, 1996, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial Boilers Commercial-Institutional Steam Generating Boilers) and 326 IAC 12-1, the pickle line boilers shall burn natural gas only in order to minimize particulate and sulfur dioxide emissions.

Comment 98

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the pickle line boilers.
[SINCE THERE IS NO CONTROL DEVICE OMIT THE PMP REQUIREMENT.]

Response to Comment 98

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

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

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

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the boilers themselves because lack of proper maintenance on the boilers can result in increased emissions. Therefore, the permit is not revised as a result of this comment

Condition D.5.6 is renumbered D.6.5. The reference to the Section B condition is added. Therefore the permit is revised as follows:

D.~~5~~**6**.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** Preventive Maintenance Plan, of this permit, is required for the pickle line boilers.

Comment 99

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [40 CFR 60, Subpart Dc]

D.5.6 Record Keeping Requirements

(a) To document compliance with ~~40 CFR 60 Subpart Dc,~~ Condition D.5.4, the Permittee shall maintain of records of the natural gas usage for the boilers.

(b) To document compliance with Condition D.5.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan. [OMIT IF PMP OMITTED.]

(c) All records shall be maintained in accordance with Section C.21- General Record Keeping Requirements, of this permit.

Response to Comment 99

The reference to 40 CFR 60, Subpart Dc, clarifies the source is keeping records as a requirement of the NSPS. Since Condition D.6.2 states that only two of the boilers shall be in operation at any one time, a record keeping requirement is being added to demonstrate compliance with that condition.

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirement to keep records of the inspections in Condition D.6.6(c) has been removed.

Condition D.5.6 is renumbered D.6.6. The reference to the Section C condition is added. Therefore the permit is revised as follows:

D.~~5~~**6**.6 Record Keeping Requirements

(a) To document compliance with ~~40 CFR 60 Subpart Dc~~, Condition D.~~5~~**6**.4, the Permittee shall maintain ~~of~~ records of the natural gas usage for the boilers.

(b) To document compliance with Condition D.6.2, the Permittee shall maintain records of when Boiler No. 3 is used as a backup for Boiler No. 1 or Boiler No. 2.

~~(b) **(c)** To document compliance with Condition D. 5**6**.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

(c) All records shall be maintained in accordance with Section C**.19**- General Record Keeping Requirements, of this permit.

Comment 100

D.6.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator. ~~Particulate~~ Filterable particulate matter emissions from Stack 18 shall not exceed 7.2 pounds per hour.

Response to Comment 100

Condition D.6.1 is renumbered D.7.1. The language and emission limit are taken verbatim from Condition 10 in CP 033-5625-00043, issued August 8, 1996. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

The Sections and conditions are renumbered and the permit is revised as follows:

D.~~6~~**7**.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator. Particulate matter emissions from Stack 18 shall not exceed 7.2 pounds per hour.

Comment 101

~~D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~ [PMP NOT NEEDED FOR PROCESS EQUIPMENT WITH RELATIVELY SMALL PTE.]

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the cold reversing mill and mist eliminator.~~

Response to Comment 101

The reversing mill generates minimal emissions. The requirement for a preventive maintenance plan is removed. The permit is revised as follows:

~~D.6.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the cold reversing mill and mist eliminator.~~

Comment 102

D.6.3 Particulate Control (BACT) [326 IAC 2-2]

The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation to control particulate emissions.

Response to Comment 102

Condition D.6.3 is renumbered D.7.2 and the permit is revised as follows:

D. ~~6.3~~**7.2**Particulate Control (BACT) [326 IAC 2-2]

The reversing mill mist eliminator shall be in operation at all times the reversing mill is in operation to control particulate emissions.

Comment 103

D.6.4 Mist Eliminator Inspections

~~Monthly~~ Annual inspections shall be performed on the mist eliminator used in conjunction with the ~~pickling line and~~ cold reversing mill to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in particulate matter occurs. ~~The~~ Failure to take response steps in accordance with Section C.18 - Compliance Response Plan ~~shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Compliance Response Plan~~ Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.

Response to Comment 103

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. Therefore, the permit is revised as follows:

~~D. 6.4 Mist Eliminator Inspections~~

~~Monthly inspections shall be performed on the mist eliminator used in conjunction with the pickling~~

~~line and cold reversing mill to insure proper operation. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change occurs. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan Preparation, Implementation, Records and Reports, shall be considered a deviation from this permit.~~

Comment 104

D.6.5 Record Keeping Requirements

~~(a) To document compliance with Condition D.6.2, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

Response to Comment 104

The Preventive Maintenance Plan condition was deleted, since this item is the only record keeping requirement, the Condition D.6.5 is deleted. The permit is revised as follows:

~~D. 6.5Record Keeping Requirements~~

~~(a) To document compliance with Condition D.6.2 the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan~~

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

Comment 105

D.7.1 Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band and cold roll galvanizing lines heaters shall burn natural gas only ~~in order to minimize particulate matter emissions.~~

Response to Comment 105

The language "in order to minimize particulate matter emissions" is not necessary and is deleted and the condition D.7.1 is renumbered D.8.1. Therefore, the permit is revised as follows:

D.~~7.1~~ **8.1**Particulate Matter Emissions - Best Available Control Technology (BACT)[326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band and cold roll galvanizing lines heaters shall burn natural gas only. ~~in order to minimize particulate matter emissions.~~

Comment 106

D.7.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the hot band galvanizing line heater shall ~~use low-NOx burners and NOx emissions shall~~ not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the

NOx emissions from the cold roll galvanizing line heater shall ~~use low-NOx burners and NOx emissions shall~~ not exceed 200 pounds per MMCF of natural gas burned.

Response to Comment 106

Condition D.7.2 is renumbered D.8.2. The language and emission limit are taken verbatim from Condition 13 in CP 033-5625-00043, issued August 8, 1996. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

To clarify the hot band galvanizing and cold roll galvanizing lines NOx emissions limits and the requirement to use low NOx burners, these requirements are separated into four conditions (a), (b), (c) and (d). Therefore the permit is revised as follows:

D.~~7.2~~**8.2**Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the hot band galvanizing line heater ~~shall use low-NOx burners and NOx emissions~~ shall not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the hot band galvanizing line heater shall use low-NOx burners.

~~(b)~~ **(c)** Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the cold roll galvanizing line heater ~~shall use low-NOx burners and NOx emissions~~ shall not exceed 200 pounds per MMCF of natural gas burned.

(d) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the cold roll galvanizing line heater shall use low-NOx burners.

Comment 107

~~D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

[NATURAL GAS BURNERS DO NOT NEED.] ~~A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the hot band and cold roll galvanizing lines and associated control devices.~~

Response to Comment 107

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

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),
(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires

identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the heaters themselves because lack of proper maintenance on the burners can result in increased emissions. Therefore, the permit is not revised as a result of this comment.

The condition is renumbered as well as the reference to the section B condition is added, the permit is revised as follows:

D.~~7.3~~**8.3**Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** - Preventive Maintenance Plan, of this permit, is required for the hot band **line** and cold roll ~~galvanizing~~ line~~s~~ **heaters** and ~~associated control devices~~ **low NOx burners**.

Comment 108

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

~~D.7.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.7.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

Response to Comment 108

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.7.4(a) has been removed. Since this item is the only record keeping requirement, Condition D.7.4 is deleted. The permit is revised as follows:

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

~~D.7.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition 7.3**8.3**, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(b) All records shall be maintained in accordance with Section C**.21**- General Record Keeping Requirements, of this permit.~~

Comment 109

D.8.1 Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall burn natural gas only ~~in order to minimize particulate matter emissions~~.

Response to Comment 109

Condition D.8.1 is renumbered D.9.1. The language "in order to minimize particulate matter emissions" is not necessary and is deleted. Therefore, the permit is revised as follows:

D.~~8.1~~ **9.1** Particulate Matter Emissions - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall burn natural gas only ~~in order to minimize particulate matter emissions~~.

Comment 110

D.8.2 Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the annealing furnaces shall use ~~low-NOx burners and NOx emissions shall~~ not exceed 200 pounds per MMCF of natural gas burned.

Response to Comment 110

Condition D.8.2 is renumbered D.9.2. The language and emission limit are taken verbatim from Condition 14 in CP 033-5625-00043, issued August 8, 1996. This construction permit was reviewed under PSD 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

To clarify the annealing furnaces NOx emission limits and requirement to use low NOx burners are separated into two conditions (a) and (b). Therefore the permit is revised as follows:

D. **9.2** Nitrogen Oxides (NOx) - Best Available Control Technology (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the NOx emissions from the annealing furnaces ~~shall use low-NOx burners and NOx emissions~~ shall not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2 (BACT), the annealing furnaces shall be low NOx burners.

Comment 111

~~D.8.3 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 the annealing furnaces and associated control devices.~~

Response to Comment 111

Condition D.8.3 is renumbered D.9.3.

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

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

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

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the furnaces themselves because lack of proper maintenance on the annealing furnaces low NOx burners can result in increased emissions. Therefore, the permit is not revised as a result of this comment.

To clarify that the annealing furnaces and the associated low NOx burners require a Preventive Maintenance Plan and the reference to Section B Condition number is added. The permit is revised as follows:

D.~~8~~**9**.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.**10** - Preventive Maintenance Plan, of this permit, is required for the annealing furnaces and ~~associated control devices~~ low NOx burners.

Comment 112

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

~~D.8.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.8.3 the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

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

[PMP NOT NEEDED FOR NATURAL GAS BURNERS.]

Response to Comment 112

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. Therefore, the requirements to keep records of the inspections in Condition D.8.4(a) has been removed. Since this item is the only record keeping requirement, Condition D.8.4 is deleted. The permit is revised as follows:

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

~~D.8.4 Record Keeping Requirements~~

~~(a) To document compliance with Condition D.8.3 **9.3** the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~(c) All records shall be maintained in accordance with Section C.**20**- General Record Keeping Requirements, of this permit.~~

Comment 113

D.9.1 Volatile Organic Compound [326 IAC 2-2]

Pursuant to SSM033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this modification, the VOC emissions shall be limited as follows:

(b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall be not exceed 60 million Btu per hour. ~~This limits the VOC emissions from these units to less than 0.02 tons per twelve (12) consecutive month period~~. [NOT IN THIS PERMIT]

Response to Comment 113

Condition D.9.1 is renumbered D.10.1. The language and emission limit are taken verbatim from Condition D.1.1(b) in SSM 033-15836-00043, issued December 31, 2002. This construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore, the permit is not revised as a result of this comment.

The VOC emissions from the combustion of natural gas in curing ovens and thermal oxidizer are limited to 0.02 tons per 12 consecutive month period and the combination of the VOC emissions from the coating lines and natural gas combustion is limited to less than 40 tons per 12 consecutive month period, so this modification is minor under 326 IAC 2-2 Prevention of Significant Deterioration Rules. Therefore the permit is revised as follows:

D.~~9.1~~ **10.1**Volatile Organic Compound [326 IAC 2-2]

Pursuant to SSM033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this modification, the VOC emissions shall be limited as follows:

(b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall ~~be~~ not exceed 60 million Btu per hour. This limits the VOC emissions from these units to less than 0.02 tons per twelve (12) consecutive month period.

Comment 114

D.9.3 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60 Subpart 60, Subpart TT. [SPECIFY WHICH PARTS OF SUBPART A ARE IN APPLICABLE.]

Response to Comment 114

Condition D.9.3 is renumbered D.10.3. This is a general condition that states the EPA New Source Performance Standards for the metal surface coating lines have been incorporated by reference into state rule 326 IAC 12-1. All of the General Provisions in 40 CFR 60, Subpart A apply, except if 40 CFR 60 Subpart TT, specifies, otherwise. Therefore the permit is not revised as result of this comment.

D. ~~9.3~~**10.3**General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60 Subpart A - General Provisions, which are incorporated as 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR 60 ~~Subpart 60~~, Subpart TT.

Comment 115

D.9.4 Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This facility is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. Permittee shall not cause to be discharged into the atmosphere more than:

(a) 1.17 pounds of VOC per gallon of coating solids applied for each calendar month for 2-side, 2-coat, coating line that continuously uses a thermal oxidizer operated at the most recently demonstrated overall efficiency.

Response to Comment 115

Condition D.9.4 is renumbered D.10.4. To clarify which pollutant is limited, the permit is revised as follows:

D.~~9.4~~ **10.4**Metal Coil Surface Coating NSPS [326 IAC 12-1-1] [40 CFR 60, Subpart TT]

This facility is subject to 40 CFR 60, Subpart TT, which is incorporated by reference in 326 IAC 12-1-1. Permittee shall not cause to be discharged into the atmosphere more than:

(a) 1.17 pounds **of VOC** per gallon of coating solids applied for each calendar month for 2-side, 2-coat, coating line that continuously uses a thermal oxidizer operated at the most recently demonstrated overall efficiency.

Comment 116

D.9.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B.10 - Preventive Maintenance Plan, of this permit, is required for the coil coating ~~operation and~~ operation's associated control device.

Response to Comment 116

Condition D.9.5 is renumbered D.10.5.

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

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(3)).

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

Many types of facilities require maintenance in order to prevent excess emissions. In addition to preventive maintenance performed on the control devices, preventive maintenance should be performed on the coil coating operations themselves because lack of proper maintenance on the coating operations can result in increased emissions. Therefore, the permit is not revised as a result of this comment.

The reference to the section B condition is added, the permit is revised as follows:

D.~~9.5~~**10.5**Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B**.10** - Preventive Maintenance Plan, of this permit, is required for the coil coating operation and associated control device.

Comment 117

D.9.7 Thermal Oxidizer [CITATION OR OMIT THIS CONDITION.]

The thermal oxidizer shall operate with a control efficiency of not less than 99% at all times when 2-side, 2-coat, coil coating line is in operation. This efficiency is necessary to ensure compliance with conditions D.9.1, D.9.2, and D.9.4.

Response to Comment 117

Condition D.9.7 is renumbered D.10.7.

SSM033-15836-00043, issued December 31, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) require the thermal oxidizer at 99% control as BACT for the coil coating line. Therefore, the permit condition is not revised as a result of this comment.

D.~~9.7~~**10.7**Thermal Oxidizer - **Best Available Control Technology (BACT) [326 IAC 2-2]**

The thermal oxidizer shall operate with a control efficiency of not less than 99% at all times when 2-side, 2-coat, coil coating line is in operation. This efficiency is necessary to ensure compliance with conditions D.~~9~~**10**.1, D.~~9~~**10**.2, and D.~~9~~**10**.4.

Comment 118

D.9.8 Testing Requirements [326 IAC 12, 40 CFR 60.463]

(a) ~~The Permittee shall conduct an initial~~ A performance test ~~as required under 40 CFR 60.8(a) no later than 60 days after achieving the maximum production rate at which the affected facility will~~ calculation shall be ~~operated, but not later than 180 days after initial start up of such facility and such other times as maybe required by the Administrator or IDEM, OAQ. Thereafter a performance test~~ conducted for each calendar month ~~for each affected facility~~ according to the procedures under condition D.~~8~~ 9.8(c), (d), (e), and (f). [INITIAL TEST REQUIREMENT HAS BEEN SATISFIED AND IS NO LONGER APPLICABLE.]

(b) 40 CFR 60.8(d) and (f) do not apply to the performance test.

(c) The Permittee shall determine the overall reduction efficiency (R) for the capture system

and the control device to determine compliance with condition D.8.4(b).

~~For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c) (1), (2), and (3) of this section. In subsequent months, the~~ The Permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c) (1), (2), and (3) of this section, shall be repeated when directed by the Administrator, IDEM, OAQ or when the Permittee elects to operate the control device or capture system at conditions different from the initial performance test.

Response to Comment 118

Condition D.9.8 is renumbered D.10.8.

The initial testing has been completed by the Permittee. Therefore the permit is revised as follows:

D.~~9.8~~**10.8**Testing Requirements [326 IAC 12, 40 CFR 60.463]

(a) The Permittee shall conduct ~~an initial performance test as required under 40 CFR 60.8(a) no later than 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial start up of such facility and such other times as maybe required by the Administrator or IDEM, OAQ. Thereafter~~ a performance test for each calendar month for each affected facility according to the procedures under condition D.~~8~~**10**.8(c), (d), (e), and (f).

(b) 40 CFR 60.8(d) and (f) do not apply to the performance test.

(c) The Permittee shall determine the overall reduction efficiency (R) for the capture system and the control device to determine compliance with condition D.~~8~~**10**.4(b).

~~For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c) (1), (2), and (3) of this section. In subsequent months, t~~**T**he Permittee may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c) (1), (2), and (3) of this section, shall be repeated when directed by the Administrator, IDEM, OAQ or when the Permittee elects to operate the control device or capture system at conditions different from the initial performance test.

Comment 120

D.9.9 Testing Requirements [326 IAC 3-6] [326 IAC 2-7-6(1), (6)]

(a) ~~Within~~ No later than 60 ~~days~~ months after the effectiveness of ~~achieving maximum production rate, but no later than 180 days after initial startup~~, this permit condition the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing utilizing methods as approved by the Commissioner to comply with Condition D.9.1 and D.9.2. This testing shall be repeated once every five (5) years from the date ~~of the most recent valid~~ compliance ~~demonstration~~ is demonstrated.

(b) The Permittee shall determine the hourly average temperature, minimum operating temperature and duct pressure or fan amperage for the thermal oxidizer from the most recent valid stack test that demonstrates compliance with the limits in conditions D.9.1 and D.9.2 as approved by IDEM.

(c) Testing shall be conducted in accordance with Section C.10 - Performance Testing.

Response to Comment 120

Pursuant to IC 13-15-5-3, this Part 70 permit becomes effective upon issuance; therefore the effective date of the permit and issuance date of the permit are the same. It is not necessary to replace the word "issuance" with the word "effectiveness".

The testing requirement language is revised to account for past valid testing demonstrations. Therefore the permit is revised as follows:

D.~~9~~**10**.9 Testing Requirements [326 IAC 3-6] [326 IAC 2-7-6(1), (6)]

(a) Within ~~60 days of achieving maximum production rate, but no later than 180 days after initial startup~~, **30 months from the date of the latest compliance demonstration stack test and in order to demonstrate compliance with Conditions D.10.1 and D.10.2**, the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing utilizing methods as approved by the Commissioner**.** ~~to comply with Condition D.9.1 and D.9.2.~~ This testing shall be repeated once every five (5) years from the date of the most recent valid compliance demonstration.

(b) The Permittee shall determine the hourly average temperature, minimum operating temperature and duct pressure or fan amperage for the thermal oxidizer from the most recent valid Stack test that demonstrates compliance with the limits in conditions D.~~9~~ **10**.1 and D.~~9~~ **10.**2 as approved by IDEM.

(c) Testing shall be conducted in accordance with Section C.**9** - Performance Testing.

Comment 121

D.9.10 Volatile Organic Compounds (VOC) [CITATION OR OMIT THIS CONDITION]

Compliance with Condition D.9.1 shall be demonstrated at the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emission for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

Response to Comment 121

Condition D.9.10 is renumbered D.10.10. The language is taken verbatim from condition D.1.10 in SSM033-15836-00043, issued December 1, 2002. This construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore the permit is not revised as a result of this comment.

The permit reference for this condition is added. Therefore the permit is revised as follows:

D.~~9.10~~**10.10** Volatile Organic Compounds (VOC)

Pursuant to SSM033-15836-00043, issued December 1, 2002, ~~C~~**c**ompliance with Condition D.~~9~~ **10.**1 shall be demonstrated at the end of each month. This shall be based on the total volatile organic compound emitted for the previous month, and adding it to previous 11 months total VOC emitted so as to arrive at VOC emission for 12 consecutive months period. The VOC emissions for a month can be arrived at using the following equation for VOC usage:

VOC emitted = [(VOC input) x (100 - %control efficiency of thermal oxidizer)] + [uncontrolled VOC]

Where VOC input is based on the formulation data supplied by the coating manufacturer. IDEM, OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Comment 122

D.9.11 Thermal Oxidizer [326 IAC 12, 40 CFR 60.464]

(a) The Permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control VOC emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with limit in D.~~8~~ 9.1, D.~~8~~ 9.2 and D.~~8~~ 9.4 was demonstrated during the most recent measurement of thermal oxidizer efficiency required by D.9.7 and D.9.8. ~~From the date of issuance of operation permit validation letter until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1500 °F.~~

(d) ~~On and after the date the approved stack test results are available, the~~ The Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal oxidizer is in operation. ~~On and after the date the approved stack test results are available the~~ The duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant stack test.

Response to Comment 122

Condition D.9.11 is renumbered D.10.11. The thermal oxidizer is already installed and the initial stack test was completed. Therefore the permit is revised as follows:

D.~~9.11~~**10.11** Thermal Oxidizer [326 IAC 12, 40 CFR 60.464]

(a) A continuous monitoring system shall be ~~installed~~, calibrated, maintained, and operated on the thermal oxidizer to continuously record the combustion temperature of any effluent gases incinerated to achieve compliance with D.~~9~~.**10.**1, D.~~9~~.**10.**2 and D.~~9~~.**10.**4. This system shall have an accuracy of ±2.5°C or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

(b) The Permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control VOC emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with limit in D.~~8~~**10.**1, D.~~8~~**10.**2 and D.~~8~~**10.**4 was demonstrated during the most recent measurement of thermal oxidizer efficiency required by D.~~9~~**10.**7 and D.9**10.**8. ~~From the date of issuance of operation permit validation letter until the approved Stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1500 °F.~~

(c) The records required by 40 CFR 60.7 shall identify each such occurrence and its duration.

(d) ~~On and after the date the approved Stack test results are available~~, ~~t~~**T**he Permittee shall observe the duct pressure or fan amperage at least once per day when the thermal oxidizer is in operation. ~~On and after the date the approved Stack test results are available t~~**T**he duct pressure or fan amperage shall be maintained within the normal range as established in most recent compliant Stack test.

Comment 123

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

D.9.12 Record keeping and Reporting Requirements [326 IAC 12, 40 CFR 60.465]

(a) The Permittee shall ~~include the following data in the initial compliance report required by 40 CFR 60.8:~~

~~(1) The overall VOC destruction rate used to attain compliance with D.9.1, D.9.2, and D.9.4;~~

~~(2) The combustion temperature of the thermal incinerator, used to attain compliance with condition D.9.1, D.9.2 and D.9.4.~~

(b) ~~Following the initial performance test, the Permittee shall~~ identify, record, and submit a written report to IDEM, OAQ every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under D.9.4. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ, quarterly.

Response to Comment 123

Condition D.9.12 is renumbered D.10.12. The initial reporting was completed. Therefore the permit is revised as follows:

D.~~9~~**10.**12Record keeping and Reporting Requirements [326 IAC 12, 40 CFR 60.465]

(a) The Permittee shall ~~include the following data in the initial compliance report required by 40 CFR 60.8:~~

~~(1) The overall VOC destruction rate used to attain compliance with D.9.1, D.9.2, and D.9.4;~~

~~(2) The combustion temperature of the thermal incinerator, used to attain compliance with condition D.9.1, D.9.2 and D.9.4.~~

~~(b)~~ ~~Following the initial performance test, the Permittee shall~~ identify, record, and submit a written report to IDEM, OAQ every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under D.~~9~~**10.**4. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to IDEM, OAQ, quarterly.

~~(c)~~**(b)** The Permittee shall include in the quarterly reports, instances when the thermal oxidizer temperature drops as defined under D.~~9~~ **10.**11. If no such periods occur, the owner or operator shall state this in the report.

~~(d)~~**(c)** The Permittee shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. The Permittee shall maintain, at the source, daily records of the thermal oxidizer combustion temperature.

Comment 124

D.9.13 Record Keeping Requirements

(a) To document compliance with Condition D.9.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.9.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

Records ~~shall~~ may include purchase orders, invoices, and material safety data sheets (MSDS) or any other information necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(4) The continuous temperature records (on a three hour average basis) for the thermal oxidizer and the average temperature used to demonstrate compliance during the most recent compliant stack test.

(5) Daily records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C.21- General Record Keeping Requirements, of this permit.

Response to Comment 124

Condition D.9.13 is renumbered D.10.13. The Permittee is required to document the amount and type of coating used monthly. It is not an option to keep these records, but there is an option as to what specific records the Permittee keeps to document compliance with Condition 10.1. Therefore the permit is not revised as a result of this comment.

D.~~9~~**10**.13Record Keeping Requirements

(a) To document compliance with Condition D~~9~~**10.**1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.~~9~~**10.**1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on a monthly basis.

Records shall include purchase orders, invoices, and material safety data sheets (MSDS) or any other information necessary to verify the type and amount used.

(3) The total VOC usage for each month.

(4) The continuous temperature records (on a three hour average basis) for the thermal oxidizer and the average temperature used to demonstrate compliance during the most recent compliant Stack test.

(5) Daily records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C**.19**- General Record Keeping Requirements, of this permit.

Comment 125

D.9.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.9.1 shall be submitted to the address listed in Section C.22 - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response to Comment 125

The section reference is added. Therefore the permit is revised as follows:

D.~~9~~**10**.14 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.~~9~~**10**.1 shall be submitted to the address listed in Section C**.20** - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, no later than thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 126

D.10.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the slag processing emissions shall be reduced by at least 95 percent based on a filterable PM10 emission basis.

(b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented as needed to reduce filterable particulate emissions from storage piles by eighty (80) percent.

Response to Comment 126

Condition D.10.1 is renumbered D.11.1. This language is taken verbatim from condition 21 in CP 033-3692-00043 issued October 7, 1994. The construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore the permit is not revised as a result of this comment.

D.~~10~~**11.**1Fugitive Dust Limitations (BACT) [326 IAC 2-2]

(a) Pursuant to CP 033-3692-00043 issued October 7, 1994, the slag processing emissions shall be reduced by at least 95 percent based on a PM10 emission basis.

(b) Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented to reduce emissions from storage piles by eighty (80) percent.

Comment 127

D.10.2 Particulate Control ~~(BACT) [326 IAC 2-2]~~

The water sprays to control fugitive particulate emissions from the slag handling operations shall

be in operation as ~~often as~~ necessary to control particulate emissions.

Response to Comment 127

Condition 25 in CP 033-3692-00043, states that the fugitive dust control plan contained in the construction permit shall be considered as Best Available Control Technology (BACT). Therefore the permit will not be revised as a result of this comment.

The revision to delete "as often as" will not change the meaning or intent of the requirement. To clarify what the fugitive dust sources are Condition D.11.3 is changed. Therefore the permit is revised as follows:

D.~~10~~ **11.**2Particulate Control ~~(~~BACT) [326 IAC 2-2]

The water sprays to control fugitive particulate emissions from the slag handling operations shall be in operation as ~~often as~~ necessary to control particulate emissions.

D.~~10~~ **11**.3Fugitive Dust Control (BACT) [326 IAC 2-2]

The fugitive dust plan shall be implemented as needed to control fugitive dust emissions from the slag handling operation and ~~fugitive dust sources~~ **storage piles**.

Comment 128

D.11.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented as needed to reduce emissions from the paved roads, parking lot, unpaved roads, traveled open areas ~~and storage piles~~ by eighty (80) percent.

D.11.2 Fugitive Dust Control (BACT) [326 IAC 2-2]

The fugitive dust plan shall be implemented as needed to control fugitive dust emissions from the above listed fugitive dust sources.

Response to Comment 128

Condition D.11.1 is renumbered D.12.1. This language is taken verbatim from condition 21 in CP 033-3692-00043 issued October 7, 1994. The construction permit was reviewed under PSD, 326 IAC 2-2 and BACT. The Part 70 program incorporates all the modifications into one document. The Permittee can request a change such as this through the source modification review process. Therefore the permit is not revised as a result of this comment.

The storage piles are listed in Section D.11. Therefore Condition D.12.1(a) is revised as follows:

D.~~11~~**12**.1 Fugitive Dust Limitations (BACT) [326 IAC 2-2]

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented to reduce emissions from the paved roads, parking lot, unpaved roads **and** traveled open areas ~~and storage piles~~ by eighty (80) percent.

Comment 129

SECTION D.12 FACILITY OPERATION CONDITIONS

INCLUDE ALL INSIGNIFICANT AND TRIVIAL ACTIVITIES. THIS IS VERY IMPORTANT TO SUBSTANTIATE

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

Insignificant Activities

(1) Specifically ~~Regulated~~ regulated insignificant ~~Activities as define in 326 IAC 20-6~~ activities.

~~(a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.~~

~~(b) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F).~~

(The information describing the processes 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 Volatile Organic Compounds (VOC) [326 IAC 8-3-2~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:~~

~~(a) Equip the cleaner with a cover;~~

~~(b) Equip the cleaner with a facility for draining cleaned parts;~~

~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~

~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~

~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~

~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.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 owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, 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^{O}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 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 owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

Response to Comment 129

The insignificant activities include those insignificant activities listed in the Steel Dynamics, Inc. Part 70 Application on Form GSD-10(a). The trivial activities are not required to be included in the Part 70 permit application. Therefore, trivial activities are not listed in the Part 70 Permit, but they may be accessed on the IDEM website at http://www.in.gov/idem/rules/agency.html in 326 IAC 2-7-1(40).

Also, the degreasing operations are not specifically regulated, since the degreasing operations use non-hazardous materials. Section D.12 is renumbered D.13. Therefore, the permit is revised as follows:

~~D.12.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]~~

~~Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:~~

~~(a) Equip the cleaner with a cover;~~

~~(b) Equip the cleaner with a facility for draining cleaned parts;~~

~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~

~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~

~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~

~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~

~~D.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 owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, 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:~~

~~(B) 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 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 owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:~~

~~(1) Close the cover whenever articles are not being handled in the degreaser.~~

~~(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.~~

~~(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.~~

SECTION D.~~12~~13 FACILITY OPERATION CONDITIONS

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

Insignificant Activities

1. Specifically regulated insignificant ~~A~~activities as define in 326 IAC 20-6:
- **(a) Temper Mill [326 IAC 6-3-2]**
- **(b) 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]**

2. Other Insignificant activities
- **(a) Space heaters, process heaters, or boilers using the following fuels:**
  - **(i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.**
  - **(ii) 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.**
- **(b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.**
- **(c) Combustion source flame safety purging on startup.**
- **(d) Fuel dispensing activities, including the following:**

(i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons q per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

(ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. A petroleum fuel, other than a 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:

(i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

(ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Refractory storage not requiring air pollution control equipment.

(g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.

(h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(j) Closed loop heating and cooling systems.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(l) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.

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

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

Insignificant Activities (continued):

(m) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.

(n) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(o) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.

(p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(q) Heat exchanger cleaning and repair.

(r) Process vessel degassing and cleaning to prepare for internal repairs.

(s) Covered conveyors for solid raw material, including the following:

(i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.

(ii) Limestone conveying of less than or equal to seven thousand two hundred

(7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.

(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) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(w) Activities associated with emergencies, including the following:

(i) On-site fire training approved by the department.

(ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.

(iii) Stationary fire pump engines.

(x) A laboratory as defined in 326 IAC 2-7-1(21)(D)

(y) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(z) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100 F).

(The information describing the processes 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~~13.1Particulate [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission pound per hour limitation from the temper mill shall be calculated using 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

(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the particulate emissions from the brazing equipment, cutting torches, soldering equipment and welding equipment shall not exceed the particulate limitation in Section C.1 - Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour.

Comment 130

Steel Dynamics, Inc. is providing supplemental comments to the above draft Part 70 permits covering Steel Dynamics, Inc. – Flat Roll Division ("SDI") and Iron Dynamics, Inc. ("IDI"). Upon further review of the draft permits we believe it is necessary to clarify the meaning of continuous monitoring and continuous compliance.

Both SDI and IDI employ continuous opacity or emission monitoring equipment. With the advent of

collecting over 87,000 opacity and over 8,700 emission data points each year, the current technologies cannot guarantee that a measurement will be accurately taken and recorded every single time. Further, the current control technologies cannot prevent all emission excursions when measuring over such short (eg. six- minute) periods of time. Even the U.S. EPA recognizes that the error band on some required monitoring equipment (e.g., continuous opacity monitor) exceeds the permit limitation, which subjects us to enforcement action when an exceedance may not have actually occurred. Regardless of maintenance and operational practices, upsets do occur.

IDEM has historically allowed a three to five percent grace threshold before taking enforcement action. Indeed, IDEM's technical support documents appropriately describe compliance "on a more or less continuous basis," thus acknowledging the technical barriers that should prevent interpreting the word "continuous" too literally. You have also incorporated new Compliance Response Plan requirements into the Part 70 permits, with enforcement capabilities for failure to abide by the Plan when an excursion occurs.

We believe the Part 70 permits for SDI and IDI should contain language that if the Compliance Response Plan is followed and the excursions and downtime do not exceed state guideline (i.e. three to five percent), the unit should be considered in continuous operation and continuous compliance for certification purposes.

Response to Comment 130

326 IAC 5-1 does not allow exemptions from the opacity limit of three (3%) to five (5%) percent of the equipment operating time, therefore, IDEM cannot simply create such an exemption where one does not exist in the rule. IDEM will continue to use enforcement discretion; however, the permit will not include the suggested blanket exemption for exceeding the opacity limit up to 3% of the equipment operating time.

Comment 131

The Permittee made numerous comments on Technical Support Document.

Response to Comment 131

The original Technical Support Document (TSD) is a public record and historical document. Therefore, the Technical Support Document is not revised as a result of these comments. All comments and responses have been documented in this Addendum to the TSD and the Part 70 permit has been revised to reflect the responses.

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.

Change 1:

The condition reference was added to condition B.15, so the permits for SDI and IDI are consistent in content.

B.15 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**.11** - Emergency Provisions); the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Change 2:

The Office of Air Quality reorganized the billing section. Therefore, Condition B.23(c) has been revised to reflect the name change as follows:

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

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M & Billing~~ **Billing, Licensing and Training** Section), to determine the appropriate permit fee.

Change 3:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule will be incorporated into your permit as follows:

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] **[326 IAC 1-1-6]**

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

Change 4:

To clarify that deviations required to be reported pursuant to an applicable requirement that exists independent of permit shall be reported according to the schedule stated in the applicable requirement and does not need to be included in the Quarterly Deviation and Compliance Monitoring Report. Therefore, the permit report form has been revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 North Senate Avenue
Indianapolis, IN 46204-2251
Phone : 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name:	Steel Dynamics, Inc.
Source Address:	4500 County Road 59, Butler, Indiana 46721
Mailing Address:	4500 County Road 59, Butler, Indiana 46721
Part 70 Permit No.:	T033-8068-00076

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.~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report**. Additional pages may be attached if necessary. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Change 5:

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. DeKalb County has been designated as attainment for the 8- hour ozone standard. Therefore no changes to this permit are necessary.

Change 6:

The letterhead has been updated to include the new Governor and IDEM commissioner. Also, use of the P.O. Box in the IDEM address is to be phased out over the next several months. Therefore the permit is revised as follows and the address is changed throughout the permit as follows:

~~Joseph E. Kernan~~ Mitchell A. Daniels, Jr.

~~Lori F. Kaplan~~ Thomas A Easterly

Indiana Department of Environmental Management
Office of Air Quality
~~P.O. Box 6015~~
100 North Senate Avenue
Indianapolis, IN ~~46206-6015~~ **46204-2251**

Change 7:

Upon further review, IDEM has decided to include the following updates to further address and clarify the permit term and the term of the conditions. With the addition of a new condition B.3, the subsequent section B conditions have been renumbered. Therefore the permit is revised as follows:

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

(a) This permit, **T033-8068-00043**, 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 of this permit

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

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

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

(a) The condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) The emission unit to which the condition pertains permanently ceases operation.

B.13 Prior Permit**s** ~~Conditions~~ Superseded [326 IAC 2-1.1-9.5] **[326 IAC 2-7-10.5]**

(a) All terms and conditions of ~~previous~~ permits **established prior to T033-8068-00043 and** issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated **as originally stated,**

(2) revised **under 326 IAC 2-7-10.5**, or

(3) deleted **under 326 IAC 2-7-10.5.**

~~by this permit~~.

(b) **Provided that all terms and conditions are accurately reflected in this permit**, ~~A~~ **a**ll previous registrations and permits are superseded by this **Part 70 operating** permit.

This condition is moved and renumbered as follows:

B.~~5~~**14** 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.~~16~~**17** Permit Renewal [326 IAC 2-7-4] **[326 IAC 2-7-8(e)]**

(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~~ **46204-2251**

(b) ~~Timely Submittal of Permit Renewal [326 IAC 2-7-4(a) (1) (D)]~~

~~(1)~~ A timely renewal application is one that is:

~~(A)~~ **(1)** Submitted at least nine (9) months prior to the date of the expiration of this permit; and

~~(B)~~ **(2)** If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

~~(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.~~20~~**21** Source Modification Requirement [326 IAC 2-7-10.5] [**326 IAC 2-2-2]**

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

(b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2.

Change 8:

To clarify the annual fee billing for combined sources, the permit is revised as follows:

B.~~23~~**24** 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. **In the event that the source is a sub-contractor and is combined with a larger Part 70 source, the larger Part 70 source may pay the Permittees' annual fees as part of the larger source billing and subject to the fee cap of the larger source. If, however, the larger Part 70 source does not pay its annual Part 70 permit fee, IDEM, OAQ will assess a separate fee in accordance with 326 IAC 2-7-19(c) to be paid by the Permittee.** 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), to determine the appropriate

permit fee.

Change 9:

A statement was added to clarify that the certification form may cover more than one document that is submitted.

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. **One certification may cover multiple forms in one (1) submittal.**

(c) A responsible official is defined at 326 IAC 2-7-1(34).

Change 10:

"Pounds" and "Hour" were capitalized.

C.1 Particulate Matter Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~ **P**ounds per ~~h~~ **H**our [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, 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.

Change 11:

To reflect the NSR reform provisions for major sources, there is a change in the record keeping requirements. Therefore the permit is revised as follows:

C.~~20~~ **19** General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] **[326 IAC 2-2]**

(a) Records of all required monitoring data 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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) may result in significant emissions increase and the

Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
- **(A) A description of the project.**
- **(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.**
- **(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
  - **(i) Baseline actual emissions;**
  - **(ii) Projected actual emissions;**
  - **(iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and**
  - **(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.**

(2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

Change 12:

To reflect the NSR reform provisions for major sources, there is a change in the reporting requirements. Therefore the permit is revised as follows:

C.~~21~~**20** 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~~ **46204-2251**

(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**, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.** .

(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ

(1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).

(g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

(h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping

Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Change 13:

The PSD CP 033-3692-00043, did not list the opacity limits for each specific fugitive dust source like other subsequent minimill PSD construction permits. Therefore, a specific list is not found in this permit.

A copy of the fugitive dust plan is attached to the permit as Attachment A. Also, a record keeping requirement is added, so when a fugitive dust control measure is used, a record is maintained to document compliance with the conditions in this section of the permit.

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

D.11.4 Record Keeping Requirements

(a) To document compliance with Condition D.11.1, the Permittee shall maintain records of the times and type of fugitive dust control measures applied to the slag handling and storage piles, as specified in the Fugitive dust plan.

(b) All records shall be maintained in accordance with Section C.19 - General Record Keeping Requirements, of this permit.

Change 14:

A copy of the fugitive dust plan is attached to the permit as Attachment A. Also, a record keeping requirement is added, so when a fugitive dust control measure is used, a record is maintained to document compliance with the conditions in this section of the permit.

D.12.2 Fugitive Dust Control (BACT) [326 IAC 2-2]

The fugitive dust plan **which includes control measures (dust suppressant, water sprays and the vacuum/sweeping of paved roads)** shall be implemented **as needed to** control fugitive dust emissions from the ~~fugitive dust sources~~ **paved roads, parking lots, unpaved roads and traveled open areas.**

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

D.12.3 Record Keeping Requirements

(a) To document compliance with Condition D.12.1, the Permittee shall maintain records of the times and type of fugitive dust control measures (dust suppressants, water sprays and vacuum/sweeping of paved areas) used as specified in the Fugitive dust plan.

(b) All records shall be maintained in accordance with Section C.19- General Record Keeping Requirements, of this permit.

Change 15:

The Steel Dynamics, Inc. permit reporting forms include the address, phone and fax numbers to be consistent with the Iron Dynamics permit report forms. The OAQ Compliance Branch telephone and facsimile numbers are changed. Therefore the permit is revised as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-~~5674~~ 0178
Fax: 317-233-~~5967~~ 6865

PART 70 OPERATING PERMIT
CERTIFICATION

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
~~P.O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ 46204-2251
Phone: 317-233-~~5674~~ 0178
Fax: 317-233-~~5967~~ 6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-~~5674~~ 0178
Fax: 317-233-~~5967~~ 6865

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
100 N. Senate Avenue
Indianapolis, IN 46204-2251
Phone: 317-233-~~5674~~ 0178
Fax: 317-233-~~5967~~ 6865

PART 70 OPERATING PERMIT
QUARTERLY REPORT

Change 16:

The Record Keeping and Reporting Requirement citations in Section D.1 are revised to match the Table of Contents references.

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

Change 17:

The condition language is revised to match the Table of Contents as follows:

D.2.1 Particulate ~~Limitations~~ (PM/PM-10) **Limitations** - Best Available Control Technology [326 IAC 2-2]
D.2.2 Nitrogen Oxides (NOx) **Limitations** - Best Available Control Technology [326 IAC 2-2]
D.2.3 Sulfur Dioxide (SO2) **Limitations** - Best Available Control Technology [326 IAC 2-2]
D.2.4 Carbon Monoxide (CO) **Limitations** - Best Available Control Technology [326 IAC 2-2]
D.2.9 Particulate Control(BACT) [326 IAC 2-2]
D.3.1 Nitrogen Oxides (NOx) **Limitations** - Best Available Control Technology [326 IAC 2-2]
D.4.1 Particulate Matter Emissions **Limitations** - Best Available Control Technology (BACT) [326 IAC 2-2]
D.4.5 Particulate Control(BACT) [326 IAC 2-2] and HCl Emissions Control
D.6.2 Nitrogen Oxides (NOx) **Limitations** - Best Available Control Technology (BACT) [326 IAC 2-2]

Change 18:

The language is revised to match the Table of Contents as follows:

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19] ~~[40 CFR 60, Subpart Dc]~~

Change 19:

U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Dekalb County as unclassifiable or attainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the PSD Review requirements. See the State Rule Applicability for the source section.

Pollutant	Status
PM2.5	Attainment or Unclassifiable

(a) DeKalb County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD),

326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability – Entire Source section.

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. DeKalb County has been designated as attainment for the 8- hour ozone standard. Since the Technical Support Document is a historic document and public record it cannot be revised. Therefore, the Ozone designation information is added here.

Pollutant	Status
8-hour ozone	Attainment or Unclassifiable

Change 21:

C.7 Operation of Equipment is the same requirement (to operate the control equipment at all times) that is in conditions D.1.15, D.1.16, D.2.9, D.4.5, D.5.2, D.10.10, D.11.2, D.11.3 and D.12.2. Therefore, It has been decided that it is best to have this requirement under compliance determination in the specific D conditions, and remove C.6 and renumber the conditions in Section C as necessary.

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

~~Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.~~

Change 22:

Upon further review, IDEM has decided to remove (d) concerning nonroad engines from B.18 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

B.18 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
Indianapolis, Indiana 46204-2251

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.~~

Change 23:

After further review, IDEM has deteremined that according to CP 033-8091-00043 Condition 18, 326 IAC 2-2-3 Best Available Control Technology is applicable to the lead emissions from the EAF baghouse. The requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply, because the Permittee received all necessary permits for construction of the EAF before July 27, 1997 and June 28, 1998. Also, a lead stack testing requirement has been added to the permit to demonstrate compliance with the lead limit in Condition D.1.8. Therefore, the permit is revised as follows:

D.1.8 Lead Limitations **Best Available Control Technology (BACT)** ~~[326 IAC 2-4.1-1]~~ [326 IAC 2-2]

Pursuant to CP 033-8091-00043 **and 326 IAC 2-2 PSD Best Available Control Technology (BACT)** the lead emissions from the EAF baghouse shall not exceed 0.19 pounds per hour. ~~Compliance with this limitation will assure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply for lead and that the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to the source.~~

Change 24:

The significance threshold for mercury under Prevention of Significant Deterioration (PSD) is 0.1 tons per year or 0.022 pounds per hour. The mercury emissions limit of 0.022 lb/hr has been added to this Part 70 permit to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable. Also, a mercury stack testing requirement has been added to the permit to demonstrate compliance with the mercury limit. The subsequent conditions and references are renumbered as necessary. The mercury emissions limit and testing requirement are added to the Part 70 permit as follows:

D.1.9 Mercury Limitations [326 IAC 2-2]

The mercury emissions from the EAF baghouse shall not exceed 0.022 pounds per hour. Compliance with this limit will render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.14 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

…….

(f) Within 180 days after issuance of this Part 70 permit, and in order to demonstrate compliance with Conditions D.1.8 and D.1.9, the Permittee shall perform lead and mercury testing on the EAF Stack 01 utilizing methods as approved by the Commissioner in accordance with Section C.9 - Performance Testing. This test shall be repeated at least once every two and one-half (2.5) years from the date of this valid compliance demonstration.

Change 25:

After further review, IDEM has determined the Permittee does not have to submit the Annual Compliance Certification in letter form. Therefore the permit is revised as follows:

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:

Change 26:

IDEM has clarified the Section B - Permit Shield Requirements condition as follows:

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.

Change 27:

This is duplicate language that is found in Condition C.1. The language is deleted in Condition D.13.1(b). The permit is revised as follows:

~~(b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations), the particulate emissions from the brazing equipment, cutting torches, soldering equipment and welding equipment shall not exceed the particulate limitation in Section C.1 - Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour.~~

Change 28:

The carbon monoxide rule 326 IAC 9-1 is federally enforceable, because this rule was approved into the Indiana SIP on December 21, 2005. Therefore, the permit is revised as follows:

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.~~

Written comments were received from EPA Region 5 on August 30, 2006. These comments and IDEM, OAQ responses, including changes to the permit (where language deleted is shown with ~~strikeout~~ and the added is shown in **bold**) are as follows:

Comment 1 TSD

Our Enforcement and Compliance Assurance Branch is aware of an ongoing opacity violation issue. This issue is not mentioned in the Enforcement Issues section of the TSD or in the permit shield. Is IDEM aware of this issue and how is it being addressed?

Response to Comment 1

IDEM compliance and enforcement staff are unaware of any opacity violation of the EAF at the SDI – Butler plant. The original Part 70 permit application was received on January 3, 1999 and contained a compliance certification for the EAF. The Part 70 permit T033-8068-00043 requires SDI to certify annual compliance with the emission limits in the permit.

Comment 2 Condition D.1

Many of the conditions throughout the permit contain BACT emission limits with no averaging period. It is suggested that an averaging period be added to these conditions to make them enforceable as a practical matter.

Response to Comment 2

IDEM disagrees. In Sections D.1, D.2, D.4, and D.10, a set averaging time is not feasible for performance testing to demonstrate compliance with the emission limits because the time it takes to process a batch of steel in an EAF varies depending on the size of the batch. When conducting performance tests especially in batch operations like EAFs, the testing time varies depending on the batch. Therefore it is not practical to set an averaging time.

The EAF does not have any CEMS. If the emissions were monitored using a CEMS, the emissions could have been measured and averaged over a fixed period of time.
The permit is not revised as result of this comment.

Comment 3 Condition D.1.4

There is a significant digit missing from the BACT limit (i.e. should be 0.20 not 0.2 lbs/ton).

Response to Comment 3

IDEM agrees. The permit is revised as follows:

D.1.4 Sulfur Dioxide (SO_2) Limitations - Best Available Control Technology [326 IAC 2-2]

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF Stack 61 and the existing EAFs Stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2**0** pounds per ton of steel produced ~~At a maximum process throughput of 400 tons per hour, this limit is equivalent to~~ **and** 80 pounds of SO_2 per hour.

Comment 4 Condition D.1.14

Based on the BACT limits in D.1.3(a), D.1.4(a) and D.1.5 it appears that the EAF has a potential to emit of almost 900 tpy of NOx, 350 tpy of SO2, and 3,500 tpy of CO. It seems that stack testing every 2.5 years for these pollutants is not sufficient, why is more frequent testing or CEMs not required?

Response to Comment 4

IDEM agrees that CEMS are the best compliance tools for BACT emission limits; however, SDI is not required to have control devices for these pollutants on the EAFs, and there are limited state and federal rules that require CEMS. In lieu of requiring NOx, SO_2 and CO CEMS, the EAF testing cycle of every 2.5 years for these pollutants is consistent with the other SDI facilities to

demonstrate compliance with the BACT limits. The permit is not revised as a result of this comment.

Comment 5 Condition D.2.8

Based on the BACT limit in Condition D.2.3, it appears that the LMS has a potential to emit of approximately 350 tpy of SO2. Stack testing every 5 years does not seem sufficient, why is more frequent testing not required? Also please explain why no VOC or CO stack testing was required for the LMS BACT limits.

Response to Comment 5

After further review, IDEM determined that the LMS stack testing is conducted every 2.5 years to be consistent with all other LMS at the other Indiana SDI facilities. The testing requirements for VOC and CO have been included in the permit. The testing requirement language is revised to account for past valid testing demonstrations. The Response to SDI Comment 64 in this ATSD as well as the permit have been revised to reflect these changes.

Comment 6 Condition D.6.1

Please clarify to which boilers this limit applies.

Response to Comment 6

Condition D.6.1 has been revised to clarify which boilers the particulate limit applies. The 326 IAC 6 rules were revised and the citation is revised to reflect the rule update.

~~D.6.1 Particulate Emission Limitations [326 IAC 6-2-2(a)]~~

~~Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-2(a) (Particulate Emission Limitations for Sources of Indirect Heat), the particulate emissions from the pickle line boilers with a combined heat input of 23.6 MMBtu per hour shall not exceed 0.48 pound per MMBtu heat input.~~

D.6.1 Particulate Emission Limitations [326 IAC 6-2-4]

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate emissions shall not exceed 0.48 pound per MMBtu heat input from only two of three pickle line boilers Nos. 1, 2 and No. 3 used at any time with a combined heat input of 23.6 MMBtu per hour.

Comment 7 Condition D.10.6(a):

Citation error.

Response to Comment 7

The Condition D.10.6(a) has been revised as follows:

D.10.6 Permanent Total Enclosure [326 IAC 2-2]

Pursuant to SSM033-15836-00043, issued December 21, 2002 and 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for the 2-side, 2 coat, coil coating line, the Permittee shall use a permanent total enclosure:

(a) The capture system for the 2-side, 2-coat, coil coating line shall meet the criteria for a Permanent Total Enclosure as described in 40 CFR 60, Method 204. The Permanent

Total Enclosure will meet the testing requirements in condition ~~D.9.8(c~~) **D.10.8(c).**

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	Steel Dynamics, Inc.
Source Location:	4500 County Road 59, Butler, Indiana 46721
County:	DeKalb
Construction Permit No.:	T033-8068-00043
SIC Code:	3312
Permit Reviewer:	Gail McGarrity

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Steel Dynamics, Inc. relating to the operation of a steel manufacturing plant.

Source Definition

This steel manufacturing plant consists of :

(a) Steel Dynamics, Inc., the primary operation, located at 4500 County Road 59, Butler, Indiana 46721; and

(b) Iron Dynamics, Inc., the supporting operation, located at 4500 County Road 59, Butler, Indiana 46721.

IDEM has determined that Steel Dynamics, Inc. (033-00043) and Iron Dynamics, Inc. (033-00076) are under the common control of Steel Dynamics, Inc. These two plants are considered one source for Part 70 applicability.

Separate Part 70 permits will be issued to Steel Dynamics, Inc. (033-8068-00043) and Iron Dynamics, Inc. (033-12614-00076), solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

Steel Dynamics, Inc. consists of the following permitted emission units and pollution control devices:

Melt Shop Operations

(a) Electric Arc Furnaces (EAF)

Two (2) twin shell electric arc furnaces (EAF #1, south constructed in 1995 and EAF #2, north constructed April 1998), each with a nominal capacity of 200 tons per hour, using a direct shell evacuation control (DSE) system ("fourth hole" duct), an overhead roof exhaust system consisting of a canopy hoods, DSE air gap for carbon monoxide (CO) emissions control, low-NO_x/oxyfuel burners (combustion control) for nitrogen oxide (NO_x) emissions control, and a baghouse (EAF baghouse) for particulate (PM and PM-10) emissions control, exhausting through the EAF stack 01 equipped with a continuous opacity monitor (COM).

(b) Continuous Casters

Two (2) continuous casters (CC #1 south constructed in 1995 and CC #2 north constructed in 1998), each with a capacity of 225 tons per hour. Emissions are controlled by canopy hoods over each caster exhausting to the EAF baghouse through stack 01.

(c) Miscellaneous natural gas combustion sources

(1) One (1) ladle dryout station (LDS), with a nominal heat input of 10 MMBtu per hour.

(2) Four (4) ladles preheat stations (LPS), with a nominal heat input of 10 MMBtu per hour each.

(3) Three (3) tundish dryers with a nominal heat input capacity of 1.5 MMBtu per hour each,

(4) Two (2) tundish preheaters with a nominal heat input capacity of 9.4 MMBtu per hour each; and

(5) Lancing and cutting of skulls, coils and steel scrap.

(d) Storage Silos and Bins

(1) Ten (10) storage silos including the following:

(A) Two (1) EAF dust silos consisting of:

(i) Bin vent 5a for particulate matter control constructed in 1995, and

(ii) Bin vent 5b for particulate matter control constructed in 1998.

(B) Six (6) Lime/carbon silos with bin vents 22 through 27 for particulate matter control,

(C) Two (2) alloy silos with bin vents 28 and 29 for particulate matter control, and

(2) Enclosed pneumatic conveying to control fugitive emissions.

(e) Slag pit digouts located beneath each electric arc furnace.

Ladle Metallurgical Stations

Two (2) Ladle Metallurgical Stations (LMS) (south constructed in 1995 and north constructed in 1998), each with a nominal capacity of 200 tons per hour. Emissions are controlled by the LMF baghouse (constructed in 1998) with emissions exhausting through stack 61. The LMS consist of the following:

(a) Three (3) Ladle Metallurgical furnaces (LMF),

(b) Two (2) argon stir stations.

Hot Mill Operations – Tunnel Furnaces

(a) One (1) tunnel furnace, No. 1 south, constructed in 1995, using low NOx burners, with a nominal heat input capacity of 117.9 MMBtu per hour (92 MMBtu per hour in the heating zone and 25.9 MMBtu per hour in the holding zone), exhausting through stack 2.

(b) One (1) tunnel furnace, No. 2 north, constructed in 1998, using low NOx burners with a nominal heat input capacity of 92 MMBtu/hr in the heating zone, exhausting through stack 42.

Cold Mill Operations

(a) Pickling Line

One (1) 1.4 million ton per year pickling line, constructed in 1997, with a packed scrubber for HCL control, mist eliminator for PM control and covered tanks maintained under negative pressure, exhausting to Stack 17.

(b) Pickle Line Scale Breaker

One (1) scale breaker, constructed in 1997, with a nominal capacity of 1.4 million tons per year that removes scale from rolled steel prior to the pickling process. Particulate matter emissions are controlled by a baghouse exhausting to stack 60.

Pickle Line Boilers

Three (3) natural gas fired boilers Nos. 1, 2 and 3, constructed in 1997, equipped with low NOx burners, exhausting to Stacks 15, 16a and 16b. The nominal heat input for each boiler is 20.4 MMBtu per hour and the permitted heat input per hour for Boilers Nos. 1 and 2 is 11.8 MMBtu per hour each. Boiler No. 3 is a standby boiler. Only two (2) boilers will be utilized at any time.

Reversing Mill

One (1) one (1.0) million tons per year cold reversing mill, constructed in 1997, with a mist eliminator for particulate matter emissions control, exhausting to Stack 18.

Galvanizing Lines

(a) One (1) hot band galvanizing line with a nominal capacity of 400,000 tons of steel rolls per year, constructed in 1997, heated by a low NOx burner natural gas- fired heater with a nominal heat input of 45 MMBtu per hour, exhausting through stack 19.

(b) Twenty-four (24), natural gas fired radiant tube heaters, added to the hot band galvanizing line in 2002. Each heater has a nominal heat input of 0.3 MMBtu per hour, exhausting inside the building.

(c) One (1) cold rolled galvanizing line with a nominal capacity of 300,000 tons of steel rolls per year, constructed in 1997, heated by a low NOx burner natural gas- fired heater with a nominal heat input of 55 MMBtu per hour, exhausting to Stack 19.

Annealing Furnaces

Sixteen (16) low NOx burners, natural gas fired annealing furnaces and forty (40) annealing bases, constructed in 1997. Each furnace has a nominal heat input of four (4) MMBtu per hour, exhausting through roof pipes 30, 31 and 32.

Paint Line (Coil Coating Line)

(a) One (1) 2-side, 2-coat coil coating line, constructed in 2003, using roll coating method, with a nominal capacity of 55,000 pounds per hour of the flat rolled painted steel, using a 44 MMBtu per hour nominal heat in put capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to stack 78.

(b) Two (2) curing ovens, constructed in 2003, each with a nominal heat input capacity of 22 MMBtu per hour using a 44 MMBtu per hour nominal heat in put capacity burner equipped thermal oxidizer to control VOC emissions and exhausting to stack 78.

Slag Handling Operation

The following slag handling operations are owned and operated by Edward C. Levy Company - Butler Mill Service.

(a) One (1) grizzly feeder with a nominal capacity of 300 tons per hour, constructed in 1995,

(b) One (1) 36" conveyor (#9), with a nominal capacity of 350 tons per hour, constructed in 1995,

(c) One (1) 30" conveyor (#7), with a nominal capacity of 350 tons per hour, constructed in 1995,

(d) Two (2) 5' by 12' Screens, each with a nominal capacity of 350 tons per hour, constructed in 1995,

(e) One (1) 24" conveyor (#6), with a nominal capacity of 100 tons per hour, constructed in 1995,

(f) One (1) 30" conveyor (#5), with a nominal capacity of 250 tons per hour, constructed in 1995,

(g) Three (3) 6' x 16' Screens, each with a nominal capacity of 250 tons per hour, constructed in 1995,

(h) One (1) 48" Conveyor (#1), with a nominal capacity of 75 tons per hour, constructed in 1995,

(i) One (1) 24" Stacker (#1), with a nominal capacity of 75 tons per hour, constructed in 1995,

(j) One (1) 24" Stacker (#2), with a nominal capacity of 125 tons per hour, constructed in 1995,

(k) One (1) 24" Conveyor (#12), with a nominal capacity of 40 tons per hour, constructed in 1995,

(l) One (1) 24" Stacker (#4), with a nominal capacity of 50 tons per hour, constructed in 1995,

(m) One (1) 4 1/4 Standard Crusher, with a nominal capacity of 50 tons per hour, constructed in 1995,

(n) One (1) 30" Conveyor (#8), with a nominal capacity of 25 tons per hour; constructed in 1995,

(o) Two (2) 30" Conveyors (#10 and #11), with a nominal capacity of 50 tons per hour each, constructed in 2003

(p) One (1) jaw crusher , with a nominal capacity of 100 tons per hour, constructed in 2003;

(q) Aggregate Storage Piles; and

Fugitive emissions from the slag handling operations are controlled by water sprays and minimizing material drop heights.

Fugitive Dust Sources

(a) Paved roads,

(b) Parking areas,

(c) Unpaved roads,

(d) Traveled open areas; and

(e) Storage piles.

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

Steel Dynamics, Inc. also consists of the following insignificant activities:

(1) Specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21):
- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (b) Cleaners and solvents characterized as follows: Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF). [326 IAC 8-3-2] [326 IAC 8-3-5]

(2) Other insignificant activities
- (a) Space heaters, process heaters, or boilers using the following fuels:
  - (i) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
  - (ii) 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.
- (b) Equipment powered by diesel fuel fired or natural gas fired internal combustion engines of capacity equal to or less than five hundred thousand (500,000) British thermal units per hour except where total capacity of equipment operated by one (1) stationary source as defined by subdivision (38) exceeds two million (2,000,000) British thermal units per hour.
- (c) Combustion source flame safety purging on startup.
- (d) Fuel dispensing activities, including the following:
  - (i) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons q per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.
  - (ii) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. 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:
  - (i) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.

(ii) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(f) Refractory storage not requiring air pollution control equipment.

(g) Equipment used exclusively for filling drums, pails, or other packaging containers with the following: Lubricating oils, Waxes and Greases.

(h) Application of: oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.

(i) Machining where an aqueous cutting coolant continuously floods the machining interface.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPS: brazing equipment, cutting torches, soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(m) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPS.

(n) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner or Operator, that is, an on-site sewage treatment facility.

(o) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.

(p) Noncontact cooling tower systems with the following: Forced and induced draft cooling tower system not regulated under a NESHAP.

(q) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(r) Heat exchanger cleaning and repair.

(s) Process vessel degassing and cleaning to prepare for internal repairs.

(t) Covered conveyors for solid raw material, including the following:

(i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day.

(ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983.

(u) 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.

(v) 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.

(w) Blow down for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(x) Activities associated with emergencies, including the following:

(i) On-site fire training approved by the department.

(ii) Emergency generators as follows: Gasoline generators not exceeding one hundred ten (110) horsepower and Diesel generators not exceeding one thousand six hundred (1,600) horsepower.

(iii) Stationary fire pump engines.

(y) A laboratory as defined in 326 IAC 2-7-1(21)(D).

3. Other Insignificant Activities

(a) Temper Mill

Existing Approvals

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

(a) CP 033-3692-00043, issued on October 7, 1994;

(b) A 033-4997-00043, issued on November 16, 1995;

(c) CP 033-5625-00043, issued on August 8, 1996;

(d) CP 033-8091-00043, issued on June 25, 1997;

(e) CP 033-9187-00043, issued on March 24, 1998;

(f) A 033-9506-00043, issued on September 1, 1998;

(g) A033-9752-00043, issued on August 18, 1998;

(h) MSM033-15186-00043, issued on February 11, 2002;

(i) I033-1515836I-00043, issued on July 24, 2002;

(j) SSM033-15836-00043, issued on December 31, 2002;

(k) EX033-16638-00043, issued on January 21, 2003; and

(l) A033-16981-00043, issued on January 21, 2003.

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

(a) CP 033-5626-00043, issued August 8, 1996 and 033-9506-00043, issued September 1, 1998

(1) Description (g) and Operation Conditions 11 and 12. pertaining to the construction of an acid regeneration facility.

(2) Extension of construction of the acid regeneration facility to January 2000.

Reason not incorporated: The acid regeneration facility was never constructed, because it is more cost effective to ship the spent pickle liquor off site for processing and the 6 month extension deadline passed without construction of the facility.

(b) CP 033-8091-00043, issued on June 25, 1997

Descriptions (d) through (f) and Operation Conditions 22 through 35 pertain specifically to Iron Dynamics, Inc. rotary hearth furnace processes and equipment.

Reason not incorporated: The Iron Dynamics, Inc. rotary hearth furnace processes and equipment descriptions, emission standards and limitations, compliance determinations, monitoring and record keeping and reporting requirements will be incorporated in a separate Part 70 permit 033-12614-00076 for Iron Dynamics, Inc.

(c) CP 033-9187-00043, issued on March 24, 1998

Descriptions (a), (b) and (d) through (f) and Operation Conditions 24 through 33 and 35 through 36, and 38 pertain specifically to Iron Dynamics, Inc. submerged arc furnace processes and equipment.

Reason not incorporated: The Iron Dynamics, Inc. submerged arc furnace processes and equipment descriptions, emission standards and limitations, compliance determinations, monitoring and record keeping and reporting requirements will be incorporated in a separate Part 70 permit 033-12614-00076 for Iron Dynamics, Inc.

(d) CP 033-8091-00043, issued on June 25, 1997

Operation Condition 21. That pursuant to 326 IAC 2-2-3 (BACT) , the tunnel furnace No. 2 holding zone shall be equipped with low NOx natural gas-fired burners not exceeding twenty-five and nine tenths (25.9) MMBtu per hour heat input and nitrogen oxides emissions shall not exceed 0.10 lbs/MMBtu. The total emissions shall not exceed 2.6 pounds per hour.

Reason not incorporated: The No. 2 tunnel furnace holding zone was never constructed.

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 January 3, 1997. Additional information was received on September 1, 1998 and August 18, 2000.

A notice of completeness letter was mailed to the source on February 13, 1997.

Potential To Emit **Steel Dynamics, Inc.** (033-00043)

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_2	greater than 100
VOC	less than 100
CO	greater than 100
NOx	greater than 100

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

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, SO2, VOC, CO and NOx 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 less than ten (10) tons per year or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year.

(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 ffset applicability.

Actual Emissions

The following table shows the actual emissions from Steel Dynamics, Inc. as reported for 2001. This information reflects the OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	121.31
PM-10	121.31
SO_2	138.07
VOC	70.87
CO	485.94
NOx	458.75
Pb	0.16959

County Attainment Status

The source is located in Dekalb County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Dekalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2

(b) Dekalb County has been classified as attainment or unclassifiable for PM10, SO2, NOx, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission

Offset applicability.

Part 70 Permit Conditions

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) The Electric Arc Furnaces (EAF #1 and #2) are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.270a, Subpart AAa). This rule requires the following:

(1) Pursuant to 40 CFR Part 60, Subpart AAa (Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 7, 1983), particulate emissions from the EAF baghouse shall not exceed 0.0052 grains per dry standard cubic feet and 10 percent opacity from the dust handling system.

(2) Pursuant to 40 CFR 20.272a(a), the Permittee shall not cause to discharge into the atmosphere from the EAF any gases that:

(A) Exit from a control device and exhibit three percent (3%) opacity or greater; and

(B) Exit from the melt shop, and due solely to the operations of the EAF, exhibit six percent (6%) opacity or greater.

(3) The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the EAF except when otherwise specified in 40 CFR Part 60, Subpart AAa.

(b) The pickle line boilers (No.1, 2 and 3) are subject to the New Source Performance Standards (Small industrial Boilers, Commercial-Institutional Steam Generating Boilers) 326 IAC 12 (40 CFR 60, Subpart Dc). This rule requires the following:

(1) Pursuant to CP 033-5625-00043, issued August 8, 1996, 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial Boilers Commercial-Institutional Steam Generating Boilers) and 326 IAC 12-1, the pickle line boilers shall burn natural gas only, in order to minimize particulate and sulfur dioxide emissions.

(2) The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the Pickle Line Boilers (No.1, 2 and 3) except when otherwise specified in 40 CFR Part 60, Subpart Dc.

(c) The Paint Line (Coil Coating Line) is subject to the New Source Performance Standards (Metal Surface Coating) (40 CFR 60, Subpart TT). This rule requires the following:

(1) The Permittee shall not cause to be discharged into the atmosphere more than:

(A) 1.17 pounds per gallon of coating solids applied for each calendar month for 2-side, 2-coat, coating line that continuously uses a thermal oxidizer operated at the most recently demonstrated overall efficiency.

-or-

(B) 10 percent of the VOCs applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency

(2) The provisions of 40 CFR Part 60, Subpart A (General Provisions), which are incorporated by reference in 326 IAC 12-1, apply to the 2-coat, 2-sided coil coating line, except when otherwise specified in 40 CFR Part 60, Subpart TT.

(d) The slag handling operation is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) since the slag material being crushed is not a nonmetallic mineral pursuant to 40 CFR 60.671.

(e) The slag handling operation is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.380 through 60.686, Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) since the operations are not producing metallic mineral concentrates from ore. None of these slag handling operations are performed in a mine or pit.

(f) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(g) The pickle line is not subject to the provisions of 40 CFR 63, Subpart CCC (NESHAPS for steel Pickling HCL process, because Steel Dynamics is not major for HAPs. Therefore, the pickle line is considered an area source.

(h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPS) (326 IAC 20 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire 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 one hundred (100) tons per year of PM10, NOx, SO2, and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (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 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 Emissions

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), all sources of fugitive dust shall not allow the generation of particulate matter such that it escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

State Rule Applicability - Individual Facilities

Melt Shop Operations

326 IAC 2-2-3 Particulate Matter Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), particulate (PM/PM10) emissions from EAF# 1 and #2 shall be controlled and limited to the following:

(1) PM/PM-10 emissions from EAFs # 1 and #2 shall be controlled by a direct shell evacuation(DSE) system and canopy hood with 100 percent overall capture exhausted to a baghouse with 99.85 control efficiency, at an air flow rate of 1.3 million dscfm, discharging through stack O1 at a height of 125 feet above the ground. A slight negative pressure shall be maintained to draw particulate matter through the DSE duct.

(2) PM/PM-10 emissions from the EAFs # 1 and #2 , EAF baghouse stack O1 shall not exceed 0.0032 grains per dry standard cubic feet at an air flow rate of 1.3 million dscf (1.62 million acfm) and maximum PM/PM-10 emissions of 35.7 pounds per hour.

(b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the continuous casters shall be controlled by a canopy hood and exhausted to the EAF baghouse to stack 01.

(c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the Permittee shall do the following:

(1) Mechanically reduce skulls, coils and steel scrap in size.

(2) Transport any skulls, coils and steel scrap not mechanically reduced in size to the steel works building and oxygen lance/cut under a furnace canopy using the baghouse to control emissions.

326 IAC 2-2-3 Nitrogen Oxide Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), EAFs #1 and #2 shall be limited to use only low-NOx natural gas fired burners, and emissions shall not exceed 0.51 pounds per ton of steel produced. The total NOx emissions shall not exceed 204.0 pounds per hour.

(b) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, shall not exceed 10 MMBtu per hour heat input and NOx emissions shall not exceed 0.10 lbs/MMBtu.

(c) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the four (4) Ladle Preheat Stations (LPS) shall be limited solely to the use of low-NOx natural gas-fired burners. The four (4) horizontal preheater stations combined shall not exceed 40 MMBtu/hr heat input and the NOx emissions shall not exceed 0.14 lbs/MMBtu.

(d) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the three (3) Tundish dryers shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner shall be limited to 1.5 MMBtu/hr heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the two (2) Tundish Preheaters shall be limited solely to the use of low-NOx natural gas-fired burners. Each burner shall not exceed 9.4 MMBtu/hr heat input and the NOx emissions shall not exceed 0.10 lbs/MMBtu.

326 IAC 2-2-3 Sulfur Dioxide Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-8091-00043, issued June 24, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the SO2 emissions from the EAFs (#1 and #2) shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke. Emissions shall not exceed 0.20 pounds per ton of steel produced. The total emissions per hour shall not exceed 80 pounds.

326 IAC 2-2-3 Carbon Monoxide Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the CO emissions from EAFs (#1and #2) shall be controlled by an adjustment gap between the EAF direct shell evacuation (DSE) and the remaining water cooled duct to the common baghouse. The CO emissions shall not exceed 2.0 pounds per ton of hot steel produced. The total emissions shall not exceed 800 pounds per hour. A slight negative pressure shall be maintained at the gap to ensure further combustion of the CO.

326 IAC 2-2-3 VOC Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), VOC emissions from EAFs (#1 and #2) shall be controlled through an extensive scrap management program. All grades of scrap shall be free of non-ferrous metals, non-metallic, excessive dirt, oil grease, and tin plate. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used. EAFs (#1 and #2) shall be limited to 0.13 pounds of VOC emissions per ton of steel produced. The total VOC emissions from the EAFs (#1 and #2) shall not exceed 52.0 pounds per hour.

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

Pursuant to 326 IAC 8-1-6, the EAFs (#1 and #2) have potential VOC emissions greater than 25 tons per year and were constructed after January 1, 1980. Therefore, the EAFs are subject to Best Available Control Technology (BACT) for VOC emissions. The BACT requirements for 326 IAC 2-2 for VOC emissions are considered equivalent to the BACT requirements under 326 IAC 8-1-6.

326 IAC 2-2 and 326 IAC 2-4.1-1 Hazardous Air Pollutant Limitations

Pursuant to CP 033-8091-00043, the lead emissions from the EAF baghouse shall not exceed 0.19 pounds per hour. Compliance with this limitation will assure that the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply for lead and that the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) do not apply to the source.

326 IAC 2-2-3 Visible Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), visible emissions from the EAF baghouse stack 01 shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60,Appendix A, Method 9).

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the fugitive emissions generated at the EAFs shall not exceed three percent (3%) opacity from any building opening as determined by a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60,Appendix A, Method 9). Three percent (3%) opacity is reflective of 100 percent capture.

(c) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the EAF slag pit digout operation located beneath each furnace shall not exceed five (5%) percent opacity.

(d) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), visible emissions from the building opening and EAF dust handling system shall not exceed three percent (3%) opacity based on a six-minute average(24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(e) Pursuant to A 033-4997-00043, issued November 16, 1995 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the carbon and flux additive system conveyors and transfer points shall be enclosed and vent through bin vents.

326 IAC 6-3 Particulate Emissions Limitations from Manufacturing Processes

The EAFs are not subject to 326 IAC 6-3, because it has applicable particulate matter emissions limitations in previous permits issued pursuant to 326 IAC 2-2-3.

326 IAC 7-1.1 Sulfur Dioxide Limitations

This source is subject to 326 IAC 7-1.1 and the BACT sulfur dioxide limits satisfy the required emissions limitations in 326 IAC 2-2 (Prevent Significant Deterioration) and 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations).

326 IAC 9-1 Carbon Monoxide Limitations

This source is not subject to 326 IAC 9-1, because it does not manufacture ferrous iron. Therefore, 326 IAC 9-1 does not apply.

Ladle Metallurgical Stations

326 IAC 2-2-3 Particulate Matter Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the ladle metallurgical stations (LMS) and stir stations shall be captured by a side draft hood and exhausted to the LMF baghouse to stack 61.

(b) Pursuant to CP 033-9187-00043, March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), PM/PM-10 emissions from the LMF stack 61 shall not exceed 0.0032 grains per dry standard cubic foot. At a maximum air flow rate of 200,000 standard cubic feet per minute, this limit is equivalent to 5.49 pounds of PM/PM-10 per hour.

326 IAC 2-2-3 Nitrogen Oxide Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-9187-00043 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the NOx emissions from the LMF stack 61 shall not exceed 0.025 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 10 pounds of NOx emissions per hour.

326 IAC 2-2-3 Sulfur Dioxide (SO2) Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), the SO_2 emissions from the LMF stack 61 and the EAFs (#1 and #2) stack 01 (permitted in CP 033–8091-00043), combined shall not exceed 0.2 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 80 pounds of SO_2 per hour.

326 IAC 2-2-3 Carbon Monoxide (CO) Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2-3 (PSD – Control Technology Review; Requirements) , CO emissions from LMF stack 61 shall not exceed 0.1 pounds per ton of steel produced. At a maximum process throughput of 400 tons per hour, this is equivalent to 40 pounds of CO per hour.

326 IAC 2-2 VOC Emission Limitations (PSD)

Pursuant to CP 033-9187-00043, issued March 24, 1998, VOC emissions from the LMF stack 61 shall not exceed 0.013 pounds per ton. At a maximum process throughput of 400 tons per hour, this limit is equivalent to 5.21 pounds of VOC per hour. Compliance with this condition makes 326 IAC 2-2 not applicable.

326 IAC 2-2-3 Visible Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), visible emissions from the LMF baghouse stack 61 shall not exceed three percent (3%) opacity based on a six-minute average (24 readings taken in accordance with 40 CFR Part 60, Appendix A, Method 9).

(b) Pursuant to CP 033-9187-00043, issued March 24, 1998 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), visible emissions escaping the capture hoods for the LMF shall be minimized by operating the fan associated with the LMF baghouse according to manufacturer specifications such that the capture efficiency of the hood is maximized.

326 IAC 6-3 Particulate Emissions Limitations from Manufacturing Processes

The LMSs are not subject to 326 IAC 6-3, because it has applicable particulate matter emissions limitations in previous permits issued pursuant to 326 IAC 2-2-3.

Hot Mill Operations – Tunnel Furnaces

326 IAC 2-2-3 Nitrogen Oxides (NOx) Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-3692-00043, issued October 7, 1994 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), Tunnel Furnace No. 1 shall be limited solely to the use of low NOx natural gas fired burners and shall not exceed 117.9 MMBtu per hour heat input and NOx emissions shall not exceed 0.17 lbs per MMBtu.

(b) Pursuant to CP 033-8091-00043, issued June 25, 1997and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), Tunnel Furnace No. 2 heating zone shall be equipped

with low NOx natural gas fired burners not exceeding 92 MMBtu per hour heat input and NOx emissions shall not exceed 0.10 lbs per MMBtu. The total emissions per hour shall not exceed 9.2 pounds per hour through stack 42.

326 IAC 2-2-3 Visible Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-8091-00043, issued June 25, 1997 and 326 IAC 2-2-3 (PSD - Control Technology Review; Requirements), visible emissions from the Tunnel Furnace Stacks 2 and 42 shall not exceed three percent (3%) opacity based on a six (6) minute average (24 readings taken in accordance with 40 CFR Part 60,Appendix A, Method 9).

Cold Mill Operations

326 IAC 2-2-3 Particulate Matter Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the particulate matter emissions from the pickle line shall be controlled by a scrubber and mist eliminator and particulate matter emissions from stack 17 shall not exceed 1.23 pounds per hour.

326 IAC 6-2-4(a) Particulate Emission Limitations

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-2-2(a)(Particulate Emission Limitations for Sources of Indirect Heat), the particulate emissions from the pickle line boilers with a combined heat input of 23.6 MMBtu per hour shall not exceed 0.48 pound per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Pt = pounds of particulate emitted per MMBtu heat input
Q = Total source maximum operating capacity in MMBtu per hour

326 IAC 6-3 Particulate Emission Limitations from Manufacturing Processes (HCl Pickling)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 6-3 (Particulate Emission Limitations from Manufacturing Processes), the pickle line hydrochloric acid mist shall be controlled by a scrubber and mist eliminator and emissions shall not exceed 0.04 grams per second and 0.32 pounds per hour.

Pickle Line Boilers

326 IAC 2-2-3 Nitrogen Oxide Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the NOx emissions from the two pickle line boilers shall not exceed 81 pounds per million cubic foot (MMCF) of gas burned.

(b) Pursuant to 326 IAC 2-2-3 (BACT), only two of the three boilers shall be utilized at any time.

Reversing Mill

326 IAC 2-2-3 Particulate Matter Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3(BACT), the particulate matter emissions from the cold reversing mill shall be controlled by a mist eliminator and particulate matter emissions from stack18 shall not exceed 7.2 pounds per hour.

326 IAC 6-3 Particulate Emissions Limitations from Manufacturing Processes

The reversing mill is not subject to 326 IAC 6-3, because it has applicable particulate matter emissions limitations in previous permits issued pursuant to 326 IAC 2-2-3.

Galvanizing Lines

326 IAC 2-2-3 Particulate Matter Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the hot band and cold roll galvanizing line heaters shall burn natural gas only, in order to minimize particulate matter emissions.

326 IAC 2-2-3 Nitrogen Oxide Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

(a) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the NOx emissions from the hot band galvanizing line heater shall br controlled by low NOx burners and NOx emissions shall not exceed 200 pounds per MMCF of natural gas burned.

(b) Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the NOx emissions from the cold roll galvanizing line heater shall be controlled by low NOx burners and NOx emissions shall not exceed 200 pounds per MMCF of natural gas burned.

Annealing Furnaces

326 IAC 2-2-3 Particulate Matter Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the annealing furnaces shall burn natural gas only in order to minimize particulate matter emissions.

326 IAC 2-2-3 Nitrogen Oxide Emissions Limitations Prevention of Significant Deterioration (PSD) (BACT)

Pursuant to CP 033-5625-00043, issued August 8, 1996 and 326 IAC 2-2-3 (BACT), the NOx emissions from the annealing furnaces shall use low NOx burners and NOx emissions shall not exceed 200 pounds per MMCF of natural gas burned.

Paint Line (Coil Coating Line)

326 IAC 2-2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) to maintain the minor status for this SSM 033-15836-00043, issued December 31, 2002, the VOC emissions shall be limited as follows:

(a) For the 2-side, 2-coat, coil coating line:
the input of VOC shall be limited to less than 3894 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This VOC usage limitation in conjunction with the operation of thermal oxidizer at 99% overall control efficiency limits VOC emissions from the coil coating line to less than 38.94 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month.

(b) The combined heat input rate for the two curing ovens shall not exceed 16 million Btu per hour and that for the thermal oxidizer shall be not exceed 60 million Btu per hour. This limits the VOC emissions from these units to less than 0.02 tons per twelve (12) consecutive month period.

(c) The items (a) and (b) combined, limits the VOC emissions from the 2-side, 2-coat coil coating line modification to less than 40 tons per 12 consecutive months period, with compliance demonstrated at the end of each month. This limit pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) makes this modification minor under this rule.

(d) Item (a) in this condition also limits the HAP emissions from the 2-side, 2-coat coil coating line modification to less than ten (10) tons of a single HAP or twenty-five (25) tons of a combination of HAPs per 12 consecutive month period. This limit makes this modification minor pursuant to 40 CFR Part 63, Subpart SSSS.

(e) During the first twelve (12) months of operation, the input of VOC shall be limited such that the total usage divided by the accumulated months of operation shall not exceed total tons per year as shown in item (a) above divided by twelve (12) months, which equals 324.5 tons per month for the 2-side, 2-coat, coil coating line.

326 IAC 8-2-4 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the volatile organic compound (VOC) discharge to the atmosphere shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the coating applicator from prime and topcoat or single coat operations.

(b) Pursuant to 326 IAC 8-1-2 (b), the coil coating line VOC emissions shall be limited to no greater than the equivalent emissions, 4.02 pounds of VOC per gallon of coating solids, allowed in (a).

The equivalency emissions are determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
D= Density of VOC in coating in pounds per gallon of VOC;
E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the coil coating operation using the compliance methods in 326 IAC 8-1-2 (a).

(c) Pursuant to 326 IAC 8-1-2(c) the overall control efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency of 46.04% calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
O = Equivalent overall efficiency of the capture system and control device as a percentage.

Slag Handling Operations

326 IAC 2-2-3 Fugitive Dust Limitations (BACT)

Pursuant to CP 033-3692-00043, issued October 7, 1994, the slag processing emissions shall be reduced by at least 95 percent based on a PM10 emission basis.

Pursuant to CP 033-3692-00042, issued October 7, 1994, the slag pits dig out operations emissions shall not exceed shall not exceed five (5) percent opacity.

Fugitive Dust Sources

Pursuant to CP 033-3692-00043, issued October 7, 1994, the fugitive dust program shall be implemented to reduce emissions m the paved roads, parking lot, unpaved roads, traveled open areas and storage piles by eighty (80) percent.

Specifically Regulated Insignificant Activities

326 IAC 8-3-2 VOC (Cold Cleaner Operations)
This source is subject to 326 IAC 8-3-2 (Cold Cleaner Operations), because the source operates a cold cleaning degreasing operation, constructed after January 1, 1980.

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control),
This source is subject to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), because the source operates a cold cleaner degreaser without remote solvent reservoirs, constructed after July 1, 1990.

Testing Requirements

(a) The Permittee shall perform PM/PM10, NOx, SO2, CO and VOC stack tests on the EAF baghouse stack S01, within 2.5 years of the latest valid compliance demonstration.

(b) The Permittee shall perform PM/PM10, NOx, CO and VOC stack tests on the LMF baghouse stack 61, within 2.5 years of the latest valid compliance demonstration.

(c) The Permittee shall perform HCl stack tests of the pickle line stack 17, within 5 years of the latest valid compliance demonstration.

(d) Pursuant to MSM 033-15836-00043, within 60 days after achieving maximum production rate but not later than 180 days after issuance of SSM 033-15836-00043, the Permittee shall perform VOC emissions and thermal oxidizer control efficiency testing of the coating lines. The Permittee shall perform coating line stacks tests within five (5) years of the initial valid compliance demonstration.

Compliance Requirements

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

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

failure to take the appropriate corrective actions within a specific time period.

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

1. The Electric Arc Furnace has applicable compliance monitoring conditions as specified below:

(a) The Permittee shall maintain a continuous opacity monitoring system to measure opacity from the EAF baghouse stack 01.

(1) In the event that a breakdown of a continuous opacity monitoring system occurs, a record made of the times and reasons of the breakdown and efforts made to correct the problem.

(2) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.

(A) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.

(B) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(C) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.

(b) The Permittee shall record the total static pressure drop across the baghouses controlling the EAFs, continuous casters and LMF at least once per shift when the EAFs, continuous casters and LMF are in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 to 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(c) The Permittee shall check and record on a once-per-shift basis the furnace (EAF) static pressure and either:

(1) check and record the control system fan motor amperes and damper positions on a once-per-shift basis; or

(2) install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate through each separately ducted hood; or

(3) install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and records damper positions on a once-per-shift basis.

(4) The monitoring device(s) may be installed in any appropriate location in the exhaust duct such that reproducible flow rate monitoring will result. The flow rate monitoring device(s) shall have an accuracy of ± 10 percent over its normal

operating range and shall be calibrated according to the manufacturer's instructions. The IDEM, OAQ, or the U.S. EPA may require the Permittee to demonstrate the accuracy of the monitoring device(s) relative to Methods 1 and 2 of 40 CFR Part 60, Appendix A.

These monitoring conditions are necessary because the baghouse for the electric arc furnace and melt shop operations must operate properly to ensure compliance with PM/PM10 and Visible Emission BACT Emission Limits, 40 CFR 60.274(a) (EAF NSPS) and 326 IAC 2-7 (Part 70).

2. The Ladle Metallurgical Stations have applicable compliance monitoring conditions as specified below:

(a) Once per shift visible emissions notations of the LMF stack 61 exhaust, melt shop building openings, dust handling system and melt shop roof monitor shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouse controlling the LMF at least once per shift when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 10.0 inches of water or a range established during the latest stack test the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure drop that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the bag house for the ladle metallurgical stations must operate properly to ensure compliance with PM/PM10 and Visible Emission BACT Emission Limitations and 326 IAC 2-7 (Part 70).

3. The Pickle Line has applicable compliance monitoring conditions as specified below:

(a) The Permittee shall record the flow rate of the packed scrubber used in conjunction with the Pickling Line, at least once per shift when the Pickling Line is in operation. When for any one reading, the flow rate of the scrubber is below a minimum of six (6) gallons per minute (gpm) or a minimum flow rate 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 flow rate that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

This monitoring condition is necessary because the scrubber and for the Pickling Line must operate properly to ensure compliance with PM/PM10 BACT Emission limitations, 326 IAC 6-3 (Particulate Emissions Limitations from Manufacturing processes) for Pickling and 326 IAC 2-7 (Part 70).

4. The pickle line scale breaker has applicable compliance monitoring conditions as specified below:

(a) Once per shift visible emissions notations of the scale breaker stack 60 exhaust, shall

be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouse controlling the scale breaker at least once per shift when the LMF is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 to 6.0 inches of water or a range established during the latest stack test the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure drop that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary because the bag house for the scale breaker must operate properly to ensure compliance with PM/PM10 and Visible Emission BACT Emission Limitations and 326 IAC 2-7 (Part 70).

5. The Paint Line (Coil Coating Line) has applicable compliance monitoring conditions as specified below:

(a) A continuous monitoring system shall be installed, calibrated, maintained, and operated on the thermal oxidizer to continuously record the combustion temperature of any effluent gases incinerated to achieve compliance with VOC limits This system shall have an accuracy of ±2.5^{o}C or ±0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater.

(b) The Permittee shall record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in the thermal oxidizer used to control VOC emissions from an affected facility remains more than 28°C (50°F) below the temperature at which compliance with the VOC limit was demonstrated during the most recent measurement of thermal oxidizer efficiency of 99%. From the date of issuance of operation permit validation letter until the approved stack test results are available, the Permittee shall operate the thermal oxidizer at or above the hourly average temperature of 1500 ^{0}F.

These monitoring conditions are necessary because the thermal oxidizer for Coil Coating Line must operate properly to ensure compliance with VOC Emissions Limit to avoid applicability of 326 IAC 2-2, VOC Emissions Limitation 326 IAC 8-2-4, Metal Coil Surface Coating NSPS 326 IAC 12-1-1 and 40 CFR 60, Subpart TT and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this iron and steel manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T033-8068-00043.

Indiana Department of Environmental Management

Supplement to Technical Support Document (TSD) For a Part 70 Operating Permit for SDI – Steel Dynamics, Inc. DeKalb County 033-8068-00043

Permitting Request Incorporated Into the Part 70 Operating Permit

This supplement to the Technical Support Document addresses pending permitting issues regarding changes/modifications to emissions units located at the Steel Dynamics, Inc. DeKalb County. Changes/modifications are referenced by their OAQ assigned application numbers. Please note that at the time these applications were under review the OAQ was known as the Office of Air Management (OAM). Only the current name will be referenced. Unit and stack identifications are those originally submitted to the OAQ. Steel Dynamics may have subsequently changed these identifications.

<u>#033-8497-00043 Amendment to Construction Permit #033-5625-00043</u>

This application is a request to amend Construction Permit 033-5626-00043 issued on August 8, 1996. CP 033-5626-00043 was a Prevention of Significant Deterioration (PSD) permit to construct a cold rolling mill. During the construction process, Steel Dynamics decided to include a pickle line scale breaker and baghouse (Stack ID 17) as part of the project. In a letter to the Office of Air Quality, dated April 23, 1997, Steel Dynamics Inc. requested an amendment to CP 033-5626-00043 to include the pickle line scale breaker and baghouse. The pickle line scale breaker and baghouse have the following parameters:

Pickle line scale breaker:	1.4 million ton per year
Baghouse grain loading:	0.003 gr/dscf
Stack Flow Rate:	10,600 acfm
Stack Height:	33 feet
Stack Diameter:	2 feet
Stack Temperature:	120 ^{0}F
Stack ID:	17

The pickle line scale breaker removes scale particles on the coil roll prior to entering the pickle line for further surface processing. The exhaust is ducted to a baghouse with a flow rate of 10,600 acfm and particulate emission rate of 0.003 gr/dscf. PM/PM_{10} emissions from the scale breaker are as follows:

(10,600 cfm/min)(0.003 gr/dscf)(1 lb/7000 gr)(60 min/hr) = 0.273 lbs/hr
0.273 lb/hr x 8760 hr/year x 1 ton/2000 lb = 1.2 tons/yr

The addition of the pickle line scale breaker and baghouse will result in a 0.273 pound per hour and 1.2 ton per year increase in the particulate matter (PM/PM_{10}) emissions above the 68.9 tons per year of particulate matter permitted under CP 033-5626-00043. PM_{10} emissions for CP 033-5626-00043 were above the PSD significant level and were reviewed pursuant to the requirements of 326 IAC 2-2 and 40 CFR 52.21 Prevention of Significant Deterioration. Thus an air quality analysis and a best available control technology (BACT) analysis were performed for PM_{10} emissions from equipment covered in CP 033-5626-00043.

Refined modeling was required for PM_{10} emissions from equipment covered in CP 033-5626-00043, since maximum concentrations were above PSD significant impact levels. NAAQS modeling showed all maximum concentrations for every time-averaged period to be below the NAAQS limit and further modeling was not required.

PSD increment analysis showed no violations of the 80 percent of available increment and no further analysis was required.

The increase of 1.2 tons per year of PM_{10} emissions from the scale breaker is not expected to change these results.

The original Best Available Control Technology (BACT) analysis for CP 033-5625-00043 considered three (3) control options for PM emissions from the pickle line. These control options were electrostatic precipitators (ESP), fabric filters (baghouse) and scrubber with mesh pads (mist eliminators). For the pickle line, electrostatic precipitators and fabric filters were eliminated from consideration due to the corrosiveness of the HCl mist contained in the waste gas. The pickle line scale breaker does not have this corrosive problem, therefore BACT for the pickle line scale breaker shall be a fabric filter (baghouse) with an outlet grain loadingof 0.003 gr/dscf.

No additional federal rules apply as a result of the addition of the pickle line scale breaker and baghouse.

The following conditions are applicable to the pickle line scale breaker and baghouse:

(1) Pursuant to 326 IAC 2-2-3 BACT, the pickle line scale breaker particulate matter (PM/PM_{10}) emissions shall be controlled by a baghouse (Stack ID 17) with an outlet grain loading of 0.003 gr/dscf and flow rate of 10,600 acfm.

(2) 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 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.

(3) The baghouse shall be operated at all times the pickle line scale breaker is in operation.

(4) Visible Emissions Notations

(a) Daily visible emission notations of the pickle line scale breaker stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation and Implementation shall be considered a violation of this permit.

(5) Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the pickle line scale breaker, at least once per shift when the pickle line scale breaker is in operation and venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with section C – Compliance Response Plan – Preparation and Implementation. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation and Implementation shall be considered a violation of this permit.

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

(6) Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the pickle line scale breaker operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

(7) Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

<u>#033-8710-00043 Amendment to Construction Permit #033-3692-00043</u>

Steel Dynamics, Inc. was issued a Prevention of Significant Deterioration (PSD) permit on October 7, 1994 for a 225 ton per hour hot rolled coil steel plant. A letter requesting modifications to the permit operation conditions was received on June 19, 1997. The proposed changes were to correct rule cites, spelling errors,

equipment descriptions, make revisions to the Fugitive Dust Control Plan and the Scrap Management Plan and replace the pound per ton (lb/ton) emissions limits for the electric arc furnace (EAF) with their equivalent pound per hour (lb/hr) limits.

Draft Amendment #033-8710-00043 was public noticed on February 3, 2000 in the Auburn Evening Star. The public notice period ended on March 4, 2000. Comments on the draft amendment were received from Steel Dynamics, Inc. Only comments on the draft amendment and the final permit conditions changed by Draft Amendment #033-8710-00043 will be addressed here.

As stated earlier, Amendment #033-8710-00043 is amending Prevention of Significant Deterioration (PSD) permit #033-3692-00043. The comments received from Steel Dynamics, Inc. during the public comment period addressed desired changes to Prevention of Significant Deterioration (PSD) permit #033-5625-00043 issued on August 8, 1996, Prevention of Significant Deterioration (PSD) permit #033-8091-00043 issued on June 25, 1997, and Prevention of Significant Deterioration (PSD) permit #033-9187-00043 issued on March 24, 1998.

Since these permits were not being amended, the comments will not be addressed here but will be addresses later in this section (these are addressed below under “Other Comments From Steel Dynamics, Inc.”). There were no comments on the proposed changes to the operation permit conditions for Prevention of Significant Deterioration (PSD) permit #033-3692-00043 as they were public noticed. Therefore, the proposed changes as they appeared in the public notice draft amendment are listed below.

Operation Condition No. 6

6. That all particulate matter/PM_{10} fugitive emissions generated during furnace operations shall be captured by the roof canopies or contained and collected within the EAF shop building. Fugitive emissions generated at the EAF during each complete cycle from tap to tap shall not exceed three (3%) percent opacity, 6 minute average (24 readings taken in accordance with EPA Method 9, Appendix A) when emitted from any roof monitor or building opening. Three (3%) percent opacity is reflective of 100 percent capture.

Operation Condition No. 7

7. That the particulate matter/PM_{10} emissions from the common baghouse vented to stack (S01) shall not exceed 0.0032 grains per dscf at an air flow rate of 1.3 million acfm and opacity shall not exceed three (3%) percent, 6 minute average (24 readings taken in accordance with EPA Method 9, Appendix A).

Operation Condition No. 8

8. That the particulate matter discharged into the atmosphere from the EAF dust handling system shall be limited to three (3%) percent opacity, 6 minute average (24 readings taken in accordance with EPA Method 9, Appendix A).

Operation Condition 10

10. That the nitrogen oxide(s) emissions from the EAF shall be controlled by the use of low-NOx natural gas-fired burners and emissions shall not exceed 114.75 pounds per hour.

NOTE: It should be noted that this EAF emission limitation pertains to CP 033-3692-000043 only, based on an EAF rating of 225 tons per hour of steel produced. CP 033-8091-00043 issued on June 25, 1997 added a second 200 ton per hour EAF and derated this EAF from 225 tons per hour to 200 tons per hour. Therefore, CP 033-8091-00043 contains EAF emission limitations that supercede this condition.

Operation Condition 11

11. That the carbon monoxide emissions from the EAF shall be controlled by a water cooled duct from the direct shell evacuation (DSE) system to the common baghouse vented to stack (S01). The adjustment gap between the DSE and the remaining duct shall be established to allow combustion air to enter to ensure that emissions shall not exceed 450 pounds per hour. A slight negative pressure shall be maintained at the gap to ensure further combustion of the CO.

NOTE: It should be noted that this EAF emission limitation pertains to CP 033-3692-000043 only, based on an EAF rating of 225 tons per hour of steel produced. CP 033-8091-00043 issued on June 25, 1997 added a second 200 ton per hour EAF and derated this EAF from 225 tons per hour to 200 tons per hour. Therefore, CP 033-8091-00043 contains EAF emission limitations that supercede this condition.

Operation Condition12

12. That the volatile organic compound emissions from the EAF shall be controlled through an extensive scrap management program (a copy to be filed with the OAM). Non-metallics in scrap shall be minimized and, all grades of scrap shall be free of excessive dirt, oil, grease. Heavily oiled scrap such as used engine blocks and machine shop borings shall not be used. The furnace shall be limited to 29.25 pounds of volatile organic compound emissions per hour.

NOTE: It should be noted that this EAF emission limitation pertains to CP 033-3692-000043 only, based on an EAF rating of 225 tons per hour of steel produced. CP 033-8091-00043 issued on June 25, 1997 added a second 200 ton per hour EAF and derated this EAF from 225 tons per hour to 200 tons per hour. Therefore, CP 033-8091-00043 contains EAF emission limitations that supercede this condition.

Operation Condition13

13. That the sulfur dioxide emissions from the EAF shall be controlled by the use of high quality scrap and monitoring the sulfur content of the coke. Emissions shall not exceed 45 pounds per hour.

NOTE: It should be noted that this EAF emission limitation pertains to CP 033-3692-000043 only, based on an EAF rating of 225 tons per hour of steel produced. CP 033-8091-00043 issued on June 25, 1997 added a second 200 ton per hour EAF and derated this EAF from 225 tons per hour to 200 tons per hour. Therefore, CP 033-8091-00043 contains EAF emission limitations that supercede this condition.

Operation Condition No. 17

17. That the Ladle Dryout Station (LDS) shall be limited to the use of natural gas, shall not exceed 10 Million Btu per hour input, and emissions of nitrogen oxides shall not exceed 0.14 lbs/MMBtu.

Additionally, SDI was required to revise Fugitive Dust Control Plan, Section 6 reflecting slag pots as the method of slag removal instead of front end loaders, Fugitive Dust Control Plan, Section 7 allowing any SDI Department to monitor and take action for speed violations instead of relying on plant security to monitor speed limits and revise the Scrap Management Plan.

<u>#033-9708-00043 Significant Source Modification</u>

CP #033-9708-00043 was received on April 23, 1998. It was a Prevention of Significant Deterioration (PSD) permit for the construction of a second natural gas fired rotary hearth furnace, a rotary hearth furnace dust storage silo, two (2) limestone storage silos and an ore preparation process. CP #033-9708-00043 was drafted and a notice was published in the Auburn Evening Star, Auburn Indiana, on October 21, 1998. The public comment period began on October 21, 1998 and ended on November 20, 1998. Comments on the draft proposed permit were received from Berger & Berger, on behalf of the Plumbers and Steamfitters Local 166, and from Steel Dynamics, Inc.

This permit is pending with IDEM, OAQ at this time and is yet to be finalized. Subsequent communication from the Permittee indicates they may not be interested in this project. At this time there are no new developments for this permit.

<u>Other Comments from Steel Dynamics, Inc.</u>

As stated earlier, during the public comment period for amendment # 033-8710-00043 Steel Dynamics Inc. made comment on construction permits which were not being amended by #033-8710-00043. No separate application number was assigned to these comments but the OAQ will address them here.

Prevention of Significant Deterioration Permit #033-5625-00043, Issued August 8, 1996

1. Inclusion of a natural gas-fired boiler for emergencies – Steel Dynamics, Inc. requested that a third natural gas fired boiler be added to the two (2) boilers permitted under CP #033-5625-00043. This third boiler (identified as Boiler No. 3) is a standby boiler and will only operate when Boiler No. 1 or Boiler No. 2 is down. The following information was provided on Boiler No. 3:

Unit ID#:	16a (Boiler No.3)
Stack ID#:	16a
Type:	Process Boiler
Heat Input:	20.4 MMBtu/hr
Burner Type:	Low NOx
Fuel:	natural gas/propane

The OAQ will add this third boiler to the Part 70 permit. The following restrictions on the use of this boiler will be included in the permit: a) Boiler No.3 will only operate when either Boiler No.1 or Boiler No. 2 is out of service, b) Boiler No.3 will not operate at a higher heat input capacity that that specified in the permit for Boiler No.1 or Boiler No. 2, c) all applicable operation conditions for Boiler No.1 or Boiler No. 2 shall apply to Boiler No.3 when in operation and d) Steel Dynamics will maintain a record on site of when Boiler No.3 is operated in place of Boiler No.1 or Boiler No. 2. The OAQ feels that these operation limitations on Boiler No.3 will preserve the modeling analysis and BACT requirements of CP 033-5625-00043. At no time will there be more than two boilers in operation.

Prevention of Significant Deterioration Permit #033-8091-00043, Issued June 25, 1997

1. Regulatory citation correction – The OAQ acknowledges that 326 IAC 2-3-1(l) should have been 326 2-1-3(i) but this change cannot be made as 326 IAC 2-1 has been repealed. The OAQ will change “permittee” to “permit” for Operation Condition #6.

2. Permit citation correction: verify if Operation Condition 39 should read Operation Condition 42 – Operation Condition is pursuant to 40 CFR 60.274a. This is the correct rule citation for the condition.

3. Baghouse pressure drop – The OAQ will change the baghouse pressure drop range in Operation Condition 41 from 6 to 8 inches water pressure to 4 to 10 inches water pressure.

4. Clarification of Operation Condition 41: verify if the “Operation, Maintenance and Fugitive Dust Plan” is a valid document or if another document is intended for this condition. – The Operation, Maintenance and Fugitive Dust Plan is the correct document for CP 033-8091-00043. For the Part 70 permit, corrective action shall be taken in accordance with the Compliance Response Plan.

5. Visible emission observations once per shift in Operation Condition 45 – If a unit has a continuous opacity monitor, visible emission observations will not be required. The OAQ will remove this requirement.

6. Clarification of data to be submitted on a quarterly basis for Operation Condition 48 – CP 033-8091-00043 was issued in June of 1997. At this point Steel Dynamics has already been submitting quarterly reports. Any clarification will be done through the Part 70 quarterly reporting.

7. Inclusion of separate baghouse for the LMF – Steel Dynamics, Inc. was to prepare a permit application for a separate LMF baghouse. The LMF baghouse was permitted in 1998.

8. Inclusion of a submerged arc furnace - Steel Dynamics, Inc. was to prepare a permit application for a submerged arc furnace. The OAQ has not received a separate application for a submerged arc furnace. If one is submitted, it will be permitted under that application number.

9. Source description changes and misc. issues – The OAQ acknowledges the following changes to the permit:
   a) Description (a) – include “and ladle metallurgy stations” after “(2) furnaces”
   b) Description (d), 2nd line – add “and coal to” after “iron ore”
   c) Description (f) – change “(11) storage silos” to “(12) storage silos” and add ”one (1) EAF dust bin” as identified in the Technical Support Document
   d) Operation Condition 4(a) – add “hearth” after rotary”, change “this electric arc furnace” to “the electric arc furnace”
   e) Operation Condition 43 – change “accedence” to “exceedance”

Fugitive Dust Control Plan

Steel Dynamics, Inc.
DeKalb County Roads 44 and 59
Butler, Indiana

Section 1 – Introduction

The following control plan, when implemented, is designed to reduce uncontrolled fugitive dust based on PM10 mass emissions basis from paved roadways and parking lots by at least 50 percent and down to 16.8 pounds of silt per mile, unpaved roadways and traveled open areas by at least 90 percent instantaneous control and storage piles and slag processing operations by 97 percent.

The plan shall be implemented on a year-round basis until such time as another plan is approved or ordered by the Indiana Department of Environmental Management.

The name of the person, his/her title, and telephone number on site who is responsible for implementing the plan shall be supplied to the OAM Compliance Section.

Section 2 – Paved Roads and Parking Lots

Paved roads and parking lots shall be controlled by the use of a vehicular vacuum sweeper and shall be performed every 14 days. Upon request of the Assistant Commissioner, Steel Dynamics, Inc. shall sample and provide to IDEM surface material silt content and surface dust loadings in accordance with field and laboratory procedures given in reference 1. IDEM will have the right to specify road segments to be sampled. Steel Dynamics, Inc. shall provide supplemental cleaning of paved road sections found to exceed the controlled silt surface loading of 16.8 pounds of silt per mile.

Cleaning of the paved road segments and parking lots may be delayed by one day when:

(a) 0.1 or more inches of rain has accumulated during the 24-hour period prior to the scheduled cleaning
(b) The road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access.
(c) It is raining at the time of the scheduled cleaning.

Section 3 – Unpaved Roads

Unpaved maintenance roads outside of the slag processing area shall be treated to control at least 90 percent instantaneous control based on a PM10 mass emission basis. All unpaved roads shall be treated with a commercially produced dust suppressant specifically manufactured for that purpose, and shall be approved in writing, by the Indiana Department of Environmental Management for the use in the State of Indiana as a chemical dust suppressant. As an alternative, Steel Dynamics, Inc. may pave previously unpaved road sections and apply paved road cleaning measures to these newly pave roads at frequencies similar to existing paved roads in the immediate area.

All roads at the slag handling processing facility shall be unpaved and treated by plant personnel with an asphaltic emulsion at a rate of at least 0.16 gallons per square yard, once per month based on average daily 70-80 vehicles of travel.

Asphalt emulsion products (AE-30 or equivalent shall be applied on a frequency of once per month, April through October, unless conditions require frequency to increase or as required by IDEM or USEPA, to insure fugitive dust control. Snow cover, inclement weather and freezing/thawing shall preclude application November through March.

Equivalent suppressant shall require written approval from IDEM shall be applied at a rate equivalent to 0.16 gallons per square yard. The initial treatment and subsequent treatments shall immediately follow the first application rates and frequencies shall be sufficient to provide at least 85 percent instantaneous control efficiency.

The above dosage may be too high to be absorbed by the road in one step. In this case, application may be done in two or more stages using lower concentrations but with corresponding increase in treatment frequency.

Treating of unpaved road segments may be delayed by one day when:

(a) 0.1 or more inches of rain have accumulated during the 24-ho8r period prior to the scheduled treatment.
(b) Road segments are saturated with water such that chemical dust suppressants cannot be accepted by the surface.
(c) Road segments are frozen or covered by ice, snow or standing water.
(d) The road segment or area is closed or abandoned. Abandoned roads will be barricaded.
(e) It is raining at the time of the scheduled treatment.

Section 4 – Unpaved Areas

Unpaved areas traveled about stock piles shall be treated with asphaltic emulsion at the following rate of 0.16 gallons per square yard by plant personnel as needed. Fugitive dust emissions shall be reduced by at least 90 percent instantaneous control on a PM10 mass emission basis.

Treating of unpaved areas may be delayed by one day when:

(a) 0.1 or more inches of rain have accumulated during the 24-ho8r period prior to the scheduled treatment.
(b) Unpaved areas are saturated with water such that chemical dust suppressants cannot be accepted by the surface.
(c) Unpaved areas are frozen or covered by ice, snow or standing water.
(d) The area is closed or abandoned.
(e) It is raining at the time of the scheduled treatment.

Section 5 – Open Aggregate Piles

Open aggregate piles consist of slag in various stages of processing. To maintain product quality and chemical stability, watering the stockpiles shall be the primary means of dust control. Water must be limited as to keep the moisture content of the product within standards.

Pile ID	Acres	Material	Moisture %	Silt %
101	0.15	Raw	2-5	1
103	0.03	-4” x 1 ½ “	1-5	<1
104	0.04	-1¼” x ¾ ”	1-5	4-5
105	0.03	-¾” x 0”	2-6	4-5

Wind erosion – When visible emissions exceed 5 percent opacity from any piles, the affected piles shall be sprayed as required by water to eliminate wind erosion. Water added to the product during processing provides added procedures specified in Section 11.

Section 6 – Slag Processing

Emissions from slag processing operations shall be controlled through the application of water. Application rates and frequencies shall be sufficient to provide at least 95 percent control efficiency from continuous drop by limiting conveyor to pile with drop height not to less than 48 inches, front end loader batch drop by limiting the drop height to pile, truck or hopper not to less than 48 inches, and watering screening and crushing operations emission points. There shall be no visible emissions evident from any batch drop, continuous drop, screening or crushing operation.

Slag that is dug out of the slag pits located beneath each electric arc furnace shall be transferred to dump trucks within the confines of the EAF shop building. Visible emissions shall not exceed 5 percent opacity from any building roof monitor or building opening as a result of this operation.

Section 7 – Vehicle Speed Control

Speed limits on paved roads shall be posted to be 20 mph. Speed limits on unpaved roads shall be 10 mph.

Compliance with these speed limits shall be monitored by plant security guards. Upon violation, employees shall receive a written warning, followed by a one day suspension if a second violation occurs. Visitors to the plant shall be denied access if repeated violations occur.

Section 8 – Material Spill control

Incidents of material spillage on plant property shall be investigated by the person responsible for implementing the plan. That person shall arrange for prompt cleanup and shall contact the party responsible for the spill to insure that corrective action can be taken.

Section 9 – Monitoring and Record Keeping

Records shall be kept within a journal which will be updated on a daily basis by the engineering department. The journals shall include sweeping and spill control activities, and dust suppressant application frequency and amount. Also, the journal shall contain the amount of water sprayed on the aggregate piles, the amount of water sprayed at the slag quench station, and the amount of water sprayed on the slag processing spray bars. The journals shall be kept in storage for a minimum of three years and shall be available for inspection or copying upon reasonable prior notice.

Section 10 – Compliance Schedule

This plan shall be fully implemented when construction is completed. Until that time the plan shall be implemented within portions of the site where construction is considered complete. Where construction is incomplete appropriate control measures shall be implemented, but cannot be comprehensively addressed. These activities shall be included with the engineering journal.

Section 11 – Unpaved Roadway and Unpaved Area Opacity Limits

Visible emissions from any unpaved road segment or unpaved area shall not exceed 5 percent opacity as averaged over any consecutive 3-minute period. All visible emission observations shall be determined in accordance with 40 CFR 60 Appendix A Method 9, except as otherwise provided below:

(a) In viewing fugitive emissions generated by vehicular traffic, the observer shall be positioned in accordance with the provisions of paragraph 2.1 of Method 9 except that the observer need not position himself with his back to the sun.

(b) The observer shall begin reading when a vehicle crosses his line of sight which shall be approximately perpendicular to the trajectory of that vehicle. The observer shall continue to observe and record visible emission opacities at 15-second intervals along that same line of sight until no less than twelve consecutive opacity readings have been obtained.

(c) If IDEM inspectors note opacity readings greater than 5 percent, Steel Dynamics, Inc. shall provide supplemental dust suppressant treatment of unpaved roads and parking lots within 24 hours except as provided for in sections 3 and 4.

Section 12 – References

1. C. Cowherd, Jr. et al., Iron and Steel Plant Open Dust Source Fugitive Emission Evaluation, EPA-600/2-79-103, U.S. Environmental Protection Agency, Cincinnati, OH, May 1979.