

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR MANAGEMENT**

**Indiana Pickling and Processing Company  
6600 U. S. Highway 12  
Portage, Indiana 46368**

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

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 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F127-8850-00041	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

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

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary steel pickling operation.

Responsible Official: Paul Abernethy, Plant Manager  
Source Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
Mailing Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
SIC Code: 5051  
County Location: Porter County  
County Status: Attainment for CO and Lead;  
Unclassifiable for PM-10, SO<sub>2</sub>, and TSP;  
Severe Nonattainment for Ozone  
Source Status: Federally Enforceable State Operating Permit (FESOP)  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (1) One (1) push/pull coil steel pickling line, identified as Line-1, using three (3) enclosed HCl baths fed from four (4) enclosed tanks, and one (1) enclosed water wash bath, with a maximum pickling capacity of 137,000 pounds of steel per hour, using a gas scrubber for control of particulate matter and HCl, and exhausting to stack #1.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (1) One (1) 350 Horsepower (equivalent to 11.7 million Btu per hour) natural gas-fired boiler with emissions below insignificant levels.

### A.4 FESOP Applicability [326 IAC 2-8-2]

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

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

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

## **SECTION B GENERAL CONDITIONS**

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

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2 Definitions [326 IAC 2-8-1]**

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

### **B.3 Permit Term [326 IAC 2-8-4(2)]**

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

### **B.4 Enforceability [326 IAC 2-8-6]**

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

### **B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

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 2-8-3(h) and 326 IAC 2-8-9.

### **B.6 Severability [326 IAC 2-8-4(4)]**

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

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

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

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required

to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

- (1) Enforcement action;
- (2) Permit termination, revocation and reissuance, or modification; and
- (3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

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

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

(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was 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 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAM may require to determine the compliance status of the source.

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

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

- (b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.
- (c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this

permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.17 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. 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).

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

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

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

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 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as needed to process the application.

**B.18 Administrative Permit Amendment [326 IAC 2-8-10]**

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- (a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

- (b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).

- (c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F), except as provided by 326 IAC 2-8-11(c).
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).
- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

- (a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments.
- (b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.
- (c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.
- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

**B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]**

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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 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

**B.23 Operational Flexibility [326 IAC 2-8-15]**

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(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

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

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

and

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

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

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

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

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.24 Construction Permit Requirement [326 IAC 2]

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

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM,

OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
  - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period;
  - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
  - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) The total source potential to emit particulate matter (PM) is less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

#### C.2 Opacity [326 IAC 5-1]

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

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

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

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

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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

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

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

**C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

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(a) The Permittee shall comply with the 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.

(b) Any change in an applicable stack shall require prior approval from IDEM, OAM.

**C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18]  
[40 CFR 61, Subpart M]**

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

**Testing Requirements [326 IAC 2-8-4(3)]**

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

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

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

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

no later than thirty-five (35) days before the intended test date.

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

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

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

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

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

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

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

necessary, including, but not limited to the following:

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

All required notifications shall be submitted to:

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

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

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

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

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

- (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP. If after this time, the Permittee does not submit an approvable ERP, then IDEM, OAM, shall supply such a plan.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4(3)]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition

of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
  - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

#### C.18 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.19 Monitoring Data Availability**

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

#### **C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)(B)]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

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

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of

maintenance has caused or contributed to a deviation.

- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

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

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

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

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

- (1) One (1) push/pull coil steel pickling line, identified as Line-1, using three (3) enclosed HCl baths fed from four (4) enclosed tanks, and one (1) enclosed water wash bath, with a maximum pickling capacity of 137,000 pounds of steel per hour, using a gas scrubber for control of particulate matter and HCl, and exhausting to stack #1.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8]

Pursuant to CP 127-1976-00041, issued on June 13, 1991, the HCl emissions from Line-1 shall not exceed 0.39 pounds per hour (equivalent to 1.71 tons per year). Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter emissions from Line-1 shall not exceed 47.55 pounds per hour (equivalent to 208.29 tons per year) for a process weight of 68.5 tons of steel per hour. This limitation will also make 326 IAC 2-2 (PSD) and 40 CFR 52.21 not applicable.

#### D.1.3 Particulate Matter Less Than Ten Microns (PM-10)

Any change or modification that may cause emissions of PM-10 to be greater than 90.0 tons per year shall require prior approval by IDEM, OAM.

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

### Compliance Determination Requirements

#### D.1.5 Testing Requirements [326 IAC 2-8-5(1)]

A compliance test shall be performed within 180 days of issuance of this permit, for the HCl gas and particulate emissions from Line-1 in order to show compliance with Condition D.1.1. This test shall be performed according to Section C - Performance Testing, using 40 CFR 60, Appendix A, Methods 26 or other methods approved by OAM.

#### D.1.6 Control Equipment

In order to comply with Condition D.1.1, the scrubber for PM and HCl particulate control shall be in operation at all times when Line-1 is in operation.

### Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

#### D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of Line-1 stack exhaust shall be performed during normal daylight operations. 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 Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

#### D.1.8 Pressure and Water Flow Rate Readings

The Permittee shall take scrubbing liquid (water) flow rate readings from the scrubber controlling the steel pickling operation, at least once a day when Line-1 is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate for scrubbing liquid shall be maintained at a minimum of 3.5 gallons of water per minute.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

#### D.1.9 Scrubber Failure Detection

In the event that scrubber failure has been observed:

- (a) Based upon the findings of the inspection, any additional corrective actions shall be devised within eight (8) hours of discovery and shall include a timetable for completion.
- (b) If corrective actions have not been made, Line-1 shall be shut down within eight (8) hours of failure, until the units are repaired.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.6, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the HAP emission limits established in Condition D.1.1.
  - (1) Inlet and outlet differential static pressure;
  - (2) Inlet temperature to wet wash;
  - (3) Visible emissions notations;
  - (4) Checklist with dates and initials for each preventive action performed; and
  - (5) Records of corrective actions.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

In order to document compliance with Condition D.1.1, the Compliance Monitoring Report Form shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or the equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

**Insignificant Activity:**

- (1) One (1) 350 Horsepower (equivalent to 11.7 million Btu per hour) natural gas-fired boiler with emissions below insignificant levels.

### **Emission Limitations and Standards [326 IAC 2-8-4(1)]**

#### **D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]**

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating, the PM emissions from the 11.7 MMBtu per hour heat input boiler shall be limited to 0.57 pounds per MMBtu heat input.

### **Compliance Determination Requirement**

#### **D.2.2 Testing Requirements [326 IAC 2-8-5(1)]**

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-8-4 and 326 IAC 2-8-5.

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

#### **D.2.3 Fuel Usage**

Natural gas shall be used for fuel in the 350 Horsepower boiler at all time the boiler is in operation.

### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

#### **D.2.4 Reporting Requirements**

The natural gas boiler certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Indiana Pickling and Processing Company  
Source Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
Mailing Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
FESOP No.: F127-8850-00041

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

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Indiana Pickling and Processing Company  
Source Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
Mailing Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
Part 70 Permit No.: F127-8850-00041

**This form consists of 2 pages**

**Page 1 of 2**

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

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

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

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

**Page 2 of 2**

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

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Indiana Pickling and Processing Company  
Source Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
Mailing Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
FESOP No.: F127-8850-00041

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

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From                      To


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

Signature:

Printed Name:

Title/Position:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
 QUARTERLY COMPLIANCE REPORT**

Source Name: Indiana Pickling and Processing Company  
 Source Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
 Mailing Address: 6600 U.S. Highway 12, Portage, Indiana 46368  
 FESOP No.: F127-8850-00041

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

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

**LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:**

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Management

## Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

### Source Background And Description

**Source Name:** Indiana Pickling and Processing Company  
**Source Location:** 6600 U.S. Highway 12, Portage, Indiana 46368  
**County:** Porter County  
**SIC Code:** 5051  
**Operation Permit No.:** F127-8850-00041  
**Permit Reviewer:** Dana L. Brown

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Indiana Pickling and Processing Company, relating to the operation of a steel pickling plant.

### Permitted Emission Units and Pollution Control Equipment

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

- (1) One (1) push/pull coil steel pickling line, identified as Line-1, using three (3) enclosed HCl baths fed from four (4) enclosed tanks, and one (1) enclosed water wash bath, with a maximum pickling capacity of 137,000 pounds of steel per hour, using a gas scrubber for control of particulate matter and HCl, and exhausting to stack #1.

### Unpermitted Emission Units and Pollution Control Equipment

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

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

There are no new facilities to be reviewed under the ENSR process.

### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) One (1) 350 Horsepower (equivalent to 11.7 million Btu per hour) natural gas-fired boiler with emissions below insignificant levels.

### Existing Approvals

This source has been operating under the following approvals:

- (1) CP127-1976-00041, issued on June 13, 1991.

### Enforcement Issue

There are no Enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP 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 FESOP application for the purposes of this review was received on August 7, 1997.

### Emissions Calculations

The calculations submitted by the applicant, for emissions of HCl from Line 1, have been accepted as accurate and correct. These calculations are provided in Appendix A of this document.

See Appendix A of this document for detailed calculations. (3 pages)

### Potential Emissions

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

Pollutant	Potential Emissions (tons/year)
PM	39.33
PM-10	39.33
SO <sub>2</sub>	0.0
VOC	0.1
CO	1.8
NO <sub>x</sub>	7.2

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

HAP	Potential Emissions (tons/year)
HCl	38.63
TOTAL	38.63

- (a) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

### Limited Potential To Emit

- (a) The source has accepted a limit on potential to emit of 8.6 tons in any consecutive twelve month period for any single HAP and 22.0 tons in any consecutive twelve month period for any combination of HAPs.
- (b) The source has also accepted a limit on potential to emit of 1.71 tons in any consecutive twelve month period for HCl.
- (c) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)		
	PM	PM-10	HAPs
Line 1	208.29	90.0	1.71 of HCl
Insignificant Activities	1.0	1.0	0.0
Total Emissions	209.29	91.0	8.6 for any single HAP, 22.0 for any combination of HAPs

Attached Table 1 summarizes the permit conditions and requirements.

**County Attainment Status**

The source is located in Porter County.

Pollutant	Status
TSP	Unclassifiable
PM-10	Unclassifiable
SO <sub>2</sub>	Unclassifiable
NO <sub>2</sub>	Attainment
Ozone	Severe Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as severe nonattainment for ozone.

**Federal Rule Applicability**

- (a) There are no New Source Performance Standards (326 IAC 12) applicable to this source.
- (b) This source may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling that will be promulgated at an undetermined future date.

**State Rule Applicability - Entire Source**

326 IAC 2-2 (Prevention of Significant Deterioration)  
 Potential to Emit PM is less than 250 tons per year, therefore 326 IAC 2-2 (PSD) does not apply.  
 326 IAC 2-6 (Emission Reporting)  
 Since this source is located in Porter County and the potential to emit VOC and NO<sub>x</sub> is less than

ten (10) tons per year, 326 IAC 2-6 does not apply. Since this source is not one of the 28 listed sources and its potential to emit PM10 is less than one-hundred (100) tons per year when added to fugitive emissions, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

- (a) The source has accepted a limit of 8.6 tons per twelve (12) consecutive month period for emissions of any individual HAP, and 22.0 tons per twelve (12) consecutive month period for emissions of any combination of HAPs.
- (b) Pursuant to CP127-1976-00041, issued on June 13, 1991, the source has also accepted a limit of 1.71 tons per twelve (12) consecutive month period for HCl. In order to comply with these limits, the source will use a gas scrubber at an efficiency of no less than 78%, at all times that the steel pickling line, Line 1, is in operation. The scrubber is equipped with a computerized monitoring system to monitor and regulate water flow levels, with an automatic shut-off when the water level gets too low.
- (c) Therefore, 326 IAC 2-7 (Part 70 permits), does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

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

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

**State Rule Applicability - Individual Facilities**

326 IAC 6-2-4 (Particulate Emissions For Sources of Indirect Heating)

The 350 Horsepower (equivalent to 11.70 million Btu per hour boiler was constructed in November of 1991, therefore it is subject to the limits in 326 IAC 6-2-4. Particulate emissions from all facilities used for indirect heating purposes which were constructed after September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{Where: } Pt = \text{allowable PM emissions, lb/MMBtu}$$
$$= 0.57 \text{ lb/MMBtu} \quad Q = \text{total heat input capacity} = 11.70 \text{ MMBtu/hr}$$

With natural gas as fuel in the 350 Horsepower boiler:

$$\frac{0.7 \text{ tons}}{\text{year}} \times \frac{1 \text{ year}}{8760 \text{ hrs}} \times \frac{1 \text{ hour}}{11.7 \text{ MMBtu}} \times \frac{2000 \text{ lb}}{1 \text{ ton}} = 0.013 \text{ lbs/MMBtu} < 0.57 \text{ lb/MMBtu}$$

Therefore, the boiler is in compliance with this rule.

326 IAC 6-3-2 (Process Operations)

Particulate matter emissions from Line-1 consists of HCl particulate. The particulate matter (PM) emissions from the steel pickling line, Line-1, shall be limited by the following:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission (lbs/hr); and}$$
$$P = \text{process weight rate (tons/hr)} = 68.5 \text{ ton/hr}$$
$$= 47.55 \text{ lb/hr (208.29 ton/yr)}$$

Potential emissions of particulate from Line-1 is less than 47.55 pounds per hour, therefore Line-1 is in compliance with this limit.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

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

1. Line 1 has applicable compliance monitoring conditions as specified below:
  - (a) Daily visible emission notations of Line-1 stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
  - (b) The Permittee shall take scrubbing liquid (water) flow rate readings from the scrubber controlling the steel pickling operation, at least once a day when Line-1 is in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the flow rate for scrubbing liquid shall be maintained at a minimum of 3.5 gallons of water per minute.

These monitoring conditions are necessary because the scrubber for the steel pickling process must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

## Air Toxic Emissions

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

This source has accepted federally enforceable air toxic emission limits of 8.6 tons per year for any single HAP and/or 22.0 tons per year for any combination of HAPs.

## Conclusion

The operation of this steel pickling plant will be subject to the conditions of the attached proposed **FESOP No. F127-8850-00041**.

Table 1

<b>Emission Unit:</b> Line-1				
<b>Pollution Control Equipment:</b> scrubber				
<b>General Description of Requirement:</b>	HCl emission limitation			
<b>Numerical Emission Limit:</b>	0.39 lb/hr (1.71 t/yr)			
<b>Regulation/Citation:</b>	CP 127-1976-00041 and 326 IAC 2-8			
<b>Compliance Demonstration:</b>	use of scrubber			
<b>PERFORMANCE TESTING</b>				
<b>Parameter/Pollutant to be Tested:</b>	HCl particulate and gas			
<b>Testing Method/Analysis:</b>	Method 26			
<b>Testing Frequency/Schedule:</b>	within 180 days of issuance			
<b>Submittal of Test Results:</b>	within 30 days			
<b>COMPLIANCE MONITORING</b>				
<b>Monitoring Description:</b>	scrubbing liquid flow rate, pressure drop, visible emissions notations			
<b>Monitoring Method:</b>	observation, gauges			
<b>Monitoring Regulation/Citation:</b>	326 IAC 2-8-5			
<b>Monitoring Frequency:</b>	daily			
<b>RECORD KEEPING</b>				
<b>Parameter/Pollutant to be Recorded:</b>	scrubbing liquid flow rate, pressure drop, normal or abnormal emissions			
<b>Recording Frequency:</b>	daily			
<b>Submittal Schedule of Reports:</b>	upon request			
<b>REPORTING REQUIREMENTS</b>				
<b>Information in Report:</b>	compliance with flow rate, pressure drop and normal emissions, number and date of any exceedances			
<b>Reporting Frequency/Submittal:</b>	upon request			
<b>Additional Comments:</b>				

**Appendix A: Emissions Calculations  
 Natural Gas Combustion Only  
 10 < MM BTU/HR <100  
 Small Industrial Boiler**

**Company Name:** Indiana Pickling and Processing Company  
**Address City IN Zip:** 6600 U.S. Highway 12  
**T:** 127-8850  
**Plt ID:** 00041  
**Reviewer:** Dana L. Brown  
**Date:** September 19, 1997

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

11.7

102.5

Emission Factor in lb/MMCF	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
	13.7	13.7	0.6	140.0	2.8	35.0
Potential Emission in tons/yr	0.7	0.7	0.0	7.2	0.1	1.8

Methodology

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 140, Low NOx Burner = 81, Flue gas recirculation = 30

Emission Factors for CO: Uncontrolled = 35, Low NOx Burner = 61, Flue gas recirculation = 37

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

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

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

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Source Name:** Indiana Pickling and Processing Company  
**Source Location:** 6600 U.S. Highway 12, Portage, Indiana 46368  
**County:** Porter  
**SIC Code:** 5051  
**Operation Permit No.:** F127-8850-00041  
**Permit Reviewer:** Cathie Moore

On October 14, 1997, the Office of Air Management (OAM) had a notice published in the Vidette Messenger, Porter, Indiana, stating that Indiana Pickling and Processing Company had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a steel pickling plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, OAM has made the following changes to the final FESOP (strikeout added to show what was deleted and bold added to show what was added):

1. The first paragraph on the front page has been changed to be as follows:

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

2. Condition A.3 "Insignificant Activities" has been changed to be as follows:

**A.3 Insignificant Activities [326 IAC 2-7-1(20)(21)] [326 IAC 2-8-3(c)(3)(I)]**

~~This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(20)(21):~~

- (1) One (1) 350 Horsepower (equivalent to 11.7 million Btu per hour) natural gas-fired boiler with emissions below insignificant levels.

3. Condition A.5 "Prior Permit Conditions Superseded" has been changed to be as follows:

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

~~This permit supersedes the operating conditions of all construction and operating permits issued to this stationary source under 326 IAC 2 prior to the effective date of this FESOP. The terms and conditions of this permit incorporate all the current applicable requirements for all emission units located at this source and supersede all terms and conditions in All registrations and permits, including construction permits, issued prior to the date of issuance of this permit. All terms and conditions in such registrations and permits are no longer in effect.~~

4. Condition B.1 "General Requirements" has been changed to be as follows:

**B.1 ~~General Requirements [IC 13-15] [IC 13-17] Permit No Defense [326 IAC 2-1-10] [IC 13]~~**

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The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder. **Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 8.**

5. Condition B.6 "Severability" has been changed to be as follows:

**B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]**

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~~(a) The provisions of this permit are severable; and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.~~ **a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.**

~~(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.~~

6. Condition B.8(c) "Duty to Supplement and Provide Information" has been changed to be as follows:

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

~~Such confidentiality claims shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).~~

7. Condition B.11(b) and (c) "Certification" has been changed to be as follows:

(b) ~~This One (1)~~ **One (1)** certification shall be ~~submitted~~ **included**, on the attached Certification Form, **with each submittal**.

(c) A responsible official is defined at 326 IAC 2-7-1~~(33)~~**(34)**.

8. Condition B.12 "Annual Compliance Certification" has been changed to be as follows:

**B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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(a) The Permittee shall annually ~~certify that this source has complied~~ **submit a compliance certification report which addresses the status of the source's compliance** with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. ~~The certification~~ **This certification shall cover the time period from January 1 to December 31 of the previous year, and** shall be submitted in letter form no later than April 15 of each year to:

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

- (b) ~~This~~ **The** annual compliance certification report required by this permit shall be **considered** timely if ~~delivered by any method and received and stamped the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received~~ by IDEM, OAM, on or before the date it is due. ~~[326 IAC 2-5-3]~~
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was 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 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.
- ~~(d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.~~

**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).**

9. Condition B.13 “Preventive Maintenance Plan” has been changed to be as follows:

~~B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]~~

- (a) **If required by specific condition(s) in Section D of this permit,** ~~the~~ Permittee shall prepare, **and** maintain ~~and implement~~ Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission **units and associated emission** control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - ~~(3) Corrective actions that will be implemented in the event an inspection indicates an out of specification situation;~~
  - ~~(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~
  - ~~(5)~~**(3)** Identification and quantification of the replacement parts which will be maintained in inventory for quick replacement.

**(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**

~~(b)(c)~~ PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

10. Condition B.14(b)(5) "Emergency Provisions" has been changed to be as follows:

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(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~~(33)~~**(34)**.

11. Condition B.15 "Deviations from Permit Requirements and Conditions" has been changed to be as follows:

**B.15** Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

(b) Written notification shall be submitted on the attached **Emergency/Deviation Occurrence Reporting Forms** or ~~their~~ **its** substantial equivalent.

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

12. Condition B.17 "Permit Renewal" has been changed to be as follows:

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include, ~~at minimum,~~ the information specified in 326 IAC 2-8-3. 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~~(20)~~**(21)**.

Request for renewal shall be submitted to:

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

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) ~~Delivered by any method and received and stamped~~ **If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received** by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
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 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

13. Condition B.19 "Minor Permit Modification" has been changed to be as follows:

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

- (a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.
- (b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-8-11(b)~~(1)(A) through (F)~~, **except as provided by 326 IAC 2-8-11(c)**.
- (c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC

2-8-11(b)(3)(A) through (D).

- (d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application ~~unless provided that the change is subject to the construction permit requirements of~~ **has received any approval required by 326 IAC 2-1, ~~326 IAC 2-2, or 326 IAC 2-3.~~** After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

14. Condition B.20(d) "Significant Permit Modification" has been changed to be as follows:

- (d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, **review by affected states** and review by U.S. EPA, as they apply to permit issuance and renewal.

15. Condition B.22 "Changes Under Section 502(b)(10) of the Clean Air Act" has been changed to be as follows:

**B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(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 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

16. Condition B.23(b) "Operational Flexibility" has been changed to be as follows:

- (b) For each such **Section 502(b)(10) of the Clean Air Act** change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~33~~)(34).

17. Condition B.24 "Construction Permit Requirement" has been changed to be as follows:

**B.24 Construction Permit Requirement [326 IAC 2]**

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

18. Condition B.26(b) "Transfer of Ownership or Operation" has been changed to be as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner, **by an administrative amendment pursuant to 326 IAC 2-8-10.**

19. Condition B.27 "Annual Fee Payment" has been changed to be as follows:

**B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing, or in a time period** consistent with the fee schedule established in 326 IAC 2-8-16.
- (b) Failure to pay may result in administrative enforcement action; **or** revocation of this permit; ~~referral to the Office of Attorney General for collection, or other appropriate measures.~~
- ~~(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~
- ~~(d)~~**(c)** If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee ~~shall~~ **may** call the following telephone numbers: 1-800-451-6027 or ~~317-233-5674~~ **317-233-0425** (ask for OAM, ~~Data~~ **Technical Support and Modeling** Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

20. Condition C.1(c) "Overall Source Limit" has been changed to be as follows:

- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1~~(20)~~**(21)**. The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

21. Condition C.3 "Open Burning" has been changed to be as follows:

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

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. **The previous sentence notwithstanding, the Permittee my 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.**

22. Condition C.5 "Fugitive Dust Emissions" has been changed to be as follows:

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

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The Permittee shall ~~be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2 (1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(e)]~~; **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.**

23. Condition C.6 "Operation of Equipment" has been changed to be as follows:

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

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- ~~(a) All equipment that may emit pollutants into the ambient air shall be properly operated to meet the requirements of this permit and maintained in accordance with Section B - Preventive Maintenance Plan.~~
- ~~(b) Unless otherwise stated in this permit, a~~All air pollution control equipment listed in this permit shall be operated at all times that the emission units vented to the control equipment are in operation, **as described in Section D of this permit.**
- ~~(c) The Permittee shall perform all necessary maintenance according to the Preventive Maintenance Plan and make all necessary attempts to keep all air pollution control equipment in proper operating condition at all times such that the requirements of this permit are met.~~

24. Condition C.7 "Stack Height" has been changed to be as follows:

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

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- (a) The Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), ~~that apply to~~ **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.
- ~~(b)~~ Any changes in ~~the an~~ applicable stacks require prior approval from IDEM, OAM.

25. Condition C.8 "Asbestos Abatement Projects - Accreditation" has been changed to be as follows:

C.8 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]  
[40 CFR 61, Subpart M]

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector must be ~~Indiana~~ accredited is ~~not~~ federally enforceable.

26. Condition C.9 "Performance Testing" has been changed to be as follows:

C.9 Performance Testing [326 IAC 3-2-16]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2-16 (Source Sampling Procedures), **except as provided elsewhere in this permit**, utilizing methods approved by the IDEM, OAM.

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

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

no later than thirty-five (35) days before the intended test date.[326 IAC 3-2.1-2(a)]

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

27. Condition C.10 "Compliance Monitoring" has been changed to be as follows:

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented ~~in accordance with the provisions of 326 IAC 2-8-4(3)~~ **as required by this permit.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

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

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(~~33~~)**(34)**.

28. Condition C.11 "Maintenance of Monitoring Equipment" has been changed to be as follows:

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

~~(a) The Permittee shall perform all necessary maintenance and make all necessary and reasonable attempts to keep all required monitoring equipment in proper operating condition at all times.~~

~~(b)~~**(a)** In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

~~(c)~~**(b)** The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. **In addition, prompt corrective action shall be initiated whenever indicated.**

~~(d) Preventive Maintenance Plans of the monitors shall be implemented. In addition, prompt corrective action shall be initiated whenever indicated.~~

29. Condition C.12 "Monitoring Methods" has been changed to be as follows:

C.12 Monitoring Methods [326 IAC 3]

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

30. Condition C.13 "Pressure Gauge Specifications" has been changed to be as follows:

### C.13 Pressure Gauge Specifications

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Whenever a condition in this permit requires the ~~taking~~ **measurement** of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

31. Condition C.14(b), (c) and (f) "Asbestos Abatement Projects" has been changed to be as follows:

(b) **The Permittee shall insure that a written notification** is to be sent on a form provided by the ~~e~~Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) asbestos removal or demolition start date;
  - (B) removal or demolition contractor; or
- (3) Waste disposal site.

(c) The Permittee shall **ensure that the notice is** postmarked or delivered ~~the notice~~ according to the guidelines set forth in 326 IAC 14-10-3(2).

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

32. The heading "Corrective Actions" has been changed to "**Corrective Actions and Response Steps**".

33. Condition C.16 "Risk Management Plan" has been changed to be as follows:

### C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

- (a) Submit:
- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

34. Condition C.17 "Compliance Monitoring Plan - Failure to take Corrective Action" has been changed to be as follows:

C.17 Compliance Monitoring Plan - Failure to Take ~~Corrective Action~~ **Response Steps** [326 IAC 2-8-4(3)]

---

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

- (2) The Permittee has determined that the **compliance monitoring** parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied; or
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The ~~Permittee determines that the~~ process has already returned to operating within "normal" parameters and no ~~corrective action is~~ **response steps are** required.
  - (d) Records shall be kept of all instances in which the ~~action values were~~ **compliance related information was** not met and of all ~~corrective actions~~ **response steps** taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
35. Condition C.18 "Actions Related to Noncompliance Demonstrated by a Stack Test" has been changed to be as follows:

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit, exceed the level specified in any condition of this permit, **the Permittee shall take** appropriate corrective actions. ~~shall be taken. A description of these corrective actions shall be submitted to IDEM, OAM within thirty (30) days of receipt of the test results. These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable.~~ The Permittee shall ~~make every effort take~~ **appropriate action** to minimize emissions from the affected facility while the corrective actions are being implemented. **IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency.** IDEM, OAM reserves the right to utilize enforcement activities to resolve the non-compliant stack tests.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one hundred twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.
36. Condition C.19(a) and (b) "Monitoring Data Availability" has been changed to be as follows:
- (a) **With the exception of performance tests conducted in accordance with Section C - Performance Testing, All** observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
  - (b) **As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, W**hen the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
37. Condition C.20(c)(4) "General Record Keeping Requirements" has been changed to be as

follows:

- (4) ~~Records of any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such records may include, but are not limited to: work orders, quality assurance procedures, quality control procedures, operator's standard operating procedures, manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance.~~ **Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.**

38. Condition C.21 "General Reporting Requirements" has been changed to be as follows:

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.**
- ~~(b)~~ **(b) The report required in (a) of this condition and R**reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- ~~(c)~~ **(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if delivered by any method and received and stamped the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]**
- ~~(d)~~ **(d) Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.**
- ~~(e)~~ **(e) All instances of deviations from any requirements of this permit must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or**

- (3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) **Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

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

- ~~(e)~~(f) Any corrective actions **or response steps** taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions **each deviation** must be clearly identified in such reports.
- ~~(f)~~(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

39. Condition D.2.2 "Testing Requirements" has been changed to be as follows:

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

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Testing of this facility is not specifically required by this permit. However, **if testing is required, compliance with the particulate matter (PM) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.** †This does not preclude testing requirements on this facility under 326 IAC ~~2-1-4(f) 2-8-4~~ and 326 IAC ~~2-8-4(1) 2-8-5~~.

- 40. The Certification Form, the Emergency/Deviation Occurrence Form, the Natural Gas Fired Boiler Certification Form and the Quarterly Compliance Form have all been modified.
- 41. The Potential to Emit Section of the Technical Support Document should be changed to be as follows. However, the Technical Support Document is not physically changed after the Public Notice. Therefore, the changes are noted in the Addendum to the Technical Support Document:

**Limited Potential To Emit**

- ~~(a)~~ The source has accepted a limit on potential to emit of 8.6 tons in any consecutive twelve month period for any single HAP and 22.0 tons in any consecutive twelve month period for any combination of HAPs.
- ~~(b)~~(a) The source has ~~also~~ accepted a limit on potential to emit of 1.71 tons in any consecutive twelve month period for HCl.
- ~~(e)~~(b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

Process/facility	Limited Potential to Emit (tons/year)		
	PM	PM-10	HAPs
Line 1	208.29	90.0	1.71 of HCl
Insignificant Activities	1.0	1.0	0.0

Total Emissions	209.29	91.0	<del>8.6 for any single HAP, 22.0 for any combination of HAPs</del> <b>1.71</b>
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Attached Table 1 summarizes the permit conditions and requirements.