AP32 Section:	12.5.1
Background Chapter	3
Reference:	2
Title:	Final Test Report Stainless Steel Processes, Slater Steels - Ft. Wayne Specialty Alloys Division, Ft. Wayne, Indiana. Prepared for Slater Steels, Ft. Wayne, IN. Prepared by FBT Testing and Environmental Services, West Chester, OH. July 1995.

FINAL TEST REPORT
STAINLESS STEEL PROCESSES
SLATER STEELS
FT. WAYNE SPECIALTY ALLOYS DIVISION
FT. WAYNE, INDIANA

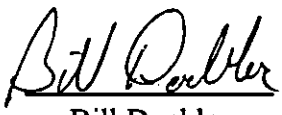
prepared for

SLATER STEELS
2400 Taylor Street
Ft. Wayne, IN 46802

prepared by

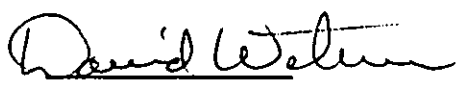
FBT Testing and Environmental Services
7419 Kingsgate Way
West Chester, Ohio 45069
(800)755-1711

drafted by



Bill Doebler
Environmental Scientist

reviewed by



David Wetmore
Director

July 1995

FBT

SLATER STEELS
FORT WAYNE SPECIALTY ALLOYS DIVISION
EMISSIONS CALCULATIONS - BASED ON APRIL STACK TESTING

EAF EMISSIONS

		PRODUCTION		CARBON MONOXIDE		NITROGEN DIOXIDE		VOLATILE ORGANICS	
RUN #	HEAT #	HRS	LBS	#/HR	#/TON	#/HR	#/TON	#/HR	#/TON
1	15	1.93	41,840	10.1	0.9	2.1	0.2	4.8	0.4
2	17	1.95	41,940	20.4	1.9	6.2	0.6	2.9	0.3
3	26	1.40	41,540	10.3	0.7	1.8	0.1	4.5	0.3
4	38	2.43	41,780	19.6	2.3	6.1	0.7	2.3	0.3
TOTALS		7.71	167,100						
AVERAGE VALUES				15.1	1.5	4.1	0.4	3.6	0.3

AOD EMISSIONS

		PRODUCTION		CARBON MONOXIDE		NITROGEN DIOXIDE	
RUN #	HEAT #	HRS	LBS	#/HR	#/TON	#/HR	#/TON
1	15	1.55	41,840	2.0	0.1	0.7	0.1
2	17	1.97	41,940	11.8	1.1	1.4	0.1
3	26	2.10	41,540	5.5	0.6	1.2	0.1
4	38	2.08	41,780	5.2	0.5	1.0	0.1
TOTALS		7.70	167,100				
AVERAGE VALUES				6.1	0.6	1.1	0.1

95-0017

1.0 INTRODUCTION

FBT Testing & Environmental Services was retained by Slater Steels to perform emissions evaluations of the Electric Arc Furnace, AOD vessel, and Passivator at their specialty alloys division in Ft. Wayne Indiana. Testing was performed on April 25-28 using USEPA reference methods to accomplish the test objectives. The FBT team of Messrs. David Wetmore, Jim McAtee, and Jon Dowdle conducted the testing. Mr. Jon Hacker, of Slater Steels, and Mr. Rick Stinnett, of ECE, coordinated the testing and process operations. Mr. David Cline and Mr. Michael Hiatt, of IDEM, observed the testing.

2.0 TEST RESULTS

Table 2.1 Summarizes the EAF Duct Emissions

Table 2.2 Summarizes the AOD Duct Emissions

Table 2.3 Summarizes the General Exhaust Vent Emissions

Table 2.4 Summarizes the EAF Duct Stack Gas Conditions

Table 2.5 Summarizes the AOD Duct Stack Gas Conditions

Table 2.6 Summarizes the General Exhaust Vent Stack Gas Conditions

Table 2.7 Summarizes the Passivation Emissions

Table 2.8 Summarizes the Passivation Stack Gas Conditions

3.0 PROCESS DESCRIPTION

3.1 Electric Arc Furnace

Slater Steels operates the Electric Arc Furnace (EAF), and accompanying AOD vessel, in the production of stainless steel alloys. This is a batch process which involves smelting of scrap steel in the EAF, transfer of the molten steel to the AOD vessel, followed by pouring of ingots. Emissions from the EAF are exhausted to a dedicated 200,000 CFM fabric filter baghouse for particulate matter control. Emissions from the AOD vessel are exhausted to a dedicated 50,000 CFM fabric filter baghouse for particulate matter control. Fugitive, charging, tapping and ingot pouring emissions from within the melt shop are captured through a multi-point roof pickup system and are exhausted to a dedicated 100,000 CFM fabric filter baghouse through the General Exhaust vent. Maximum batch operating capacity is 40,000 pounds/batch. Since every formulation is unique as specified by the customer, four different stainless steel formulations were chosen as representatives of normal operating conditions.

3.1.2 Stack Description

The sampling location for the EAF is in the 95.5" ID vent stack prior to the baghouse. The sampling ports are located located 264" downstream of the nearest flow disturbance and 66" upstream of a flow disturbance. The sampling location for the AOD is in the 62.5" ID baghouse exhaust stack. The sampling ports are located located 120" downstream of the nearest flow disturbance and 60" upstream of the stack exhaust. The sampling location for the General

Table 2.1 Summary of EAF Duct Emissions

Run #	Date/Time	Carbon Monoxide		NOx as NO2		VOC as THC	
		Concentration (ppm)[a]	Emission Rate (lb/hr)[b]	Concentration (ppm)[a]	Emission Rate (lb/hr)[b]	Concentration (ppm)[a]	Emission Rate (lb/hr)[b]
1	4-25-95 / 1201-1357	10.6	10.1	1.4	2.1	3.2	4.8
2	4-25-95 / 1559-1756	21.4	20.4	4.0	6.2	1.9	2.9
3	4-26-95 / 1317-1441	10.5	10.3	1.1	1.8	2.9	4.5
4	4-27-95 / 1431-1657	20.0	19.6	3.8	6.1	1.5	2.3
Average		**15.6**	**15.1**	**2.6**	**4.1**	**2.4**	**3.6**

Table 2.2 Summary of AOD Duct Emissions

Run #	Date/Time	Carbon Monoxide		NOx as NO2	
		Concentration (ppm)[a]	Emission Rate (lb/hr)[b]	Concentration (ppm)[a]	Emission Rate (lb/hr)[b]
1	4-25-95 / 1411-1544	18.0	2.0	3.7	0.7
2	4-25-95 / 2011-2209	93.8	11.8	6.9	1.4
3	4-26-95 / 1450-1656	40.5	5.5	5.5	1.2
4	4-27-95 / 1826-2031	40.0	5.2	4.8	1.0
Average		**48.1**	**6.1**	**5.2**	**1.1**

Table 2.3 Summary of General Exhaust Vent Emissions

Run #	Date/Time	Carbon Monoxide		NOx as NO2	
		Concentration (ppm)[a]	Emission Rate (lb/hr)[b]	Concentration (ppm)[a]	Emission Rate (lb/hr)[b]
1	4-25-95 / 1201-1544	0.3	0.1	N/A	N/A
2	4-25-95 / 1559-2209	4.1	1.6	N/A	N/A
3	4-26-95 / 1317-1656	4.6	1.8	0.002	0.001
4	4-27-95 / 1431-2031	3.0	1.2	0.074	0.048
Average		**3.0**	**1.2**	**0.038**	**0.025**

[a] Parts per million

[b] Pounds per hour

Table 2.4 Stack Gas Conditions for EAF Duct

Run #	Date/Time	Vs	Flow Rate		Ts	H_2O	O_2	CO_2
		(ft/sec)[a]	(acfm)[b]	(dscfm)[c]	°F	%	%	%
1	4-25-95 / 1201-1357	73.0	217,909	199,615	78	1.6	20.9	0.0
2	4-25-95 / 1559-1756	73.5	219,278	199,343	78	2.3	20.9	0.0
3	4-26-95 / 1317-1441	75.7	225,900	194,701	78	3.0	20.9	0.0
4	4-27-95 / 1431-1657	75.3	224,727	190,496	78	4.3	20.9	0.0
Average		74.4	221,954	196,039	78	2.8	20.9	0.0

Table 2.5 Stack Gas Conditions for AOD Duct

Run #	Date/Time	Vs	Flow Rate		Ts	H_2O	O_2	CO_2
		(ft/sec)[a]	(acfm)[b]	(dscfm)[c]	°F	%	%	%
1	4-25-95 / 1411-1544	19.7	25,239	20,137	78	5.0	20.9	0.0
2	4-25-95 / 2011-2209	22.6	28,847	27,452	78	0.9	20.9	0.0
3	4-26-95 / 1450-1656	24.2	30,889	24,746	78	6.3	20.9	0.0
4	4-27-95 / 1826-2031	23.4	29,909	26,591	78	1.1	20.9	0.0
Average		22.5	28,721	24,731	78	3.3	20.9	0.0

Table 2.6 Stack Gas Conditions for General Exhaust Vent

Run #	Date/Time	Vs	Flow Rate		Ts	H_2O	O_2	CO_2
		(ft/sec)[a]	(acfm)[b]	(dscfm)[c]	°F	%	%	%
1	4-25-95 / 1201-1544	68.2	87,175	79,368	78	1.9	20.7	0.0
2	4-25-95 / 1559-2209	68.4	87,407	80,094	78	1.8	21.0	0.0
3	4-26-95 / 1317-1656	69.2	88,516	78,009	78	3.2	20.7	0.0
4	4-27-95 / 1431-2031	70.7	90,396	84,191	78	1.1	20.7	0.0
Average		69.1	88,373	80,416	78	2.0	20.8	0.0

[a] Velocity in feet per second

[b] Volumetric flow rate in actual cubic feet per minute

[c] Volumetric flow rate in dry standard cubic feet per minute

Table 2.7 Summary of Stack Gas Conditions for Passivation

Run #	Date/Time	Vs	Flow Rate		Ts	H2O	O2	CO2
		(fps)[a]	(acfm)[b]	(dscfm)[c]	°F	%	%	%
1	4-28-95 / 0827-0926	33.6	32,058	30,057	65	3.8	20.9	0.0
2	4-28-95 / 1016-1116	35.0	33,353	31,780	69	1.5	20.9	0.0
3	4-28-95 / 1317-1417	35.6	34,006	32,403	69	1.5	20.9	0.0
Average		**34.7**	**33,139**	**31,413**	**68**	**2.3**	**20.9**	**0.0**

[a] Velocity in feet per second

[b] Actual cubic feet per minute

[c] Dry standard cubic feet per minute

Table 2.8 Summary of Emissions for Passivation

Run #	Date/Time	NOx		PM		HF	
		(ppm)[a]	(lb/hr)[b]	(gr/dscf)	(lb/hr)[b]	(ppm)[a]	(lb/hr)[b]
1	4-28-95 / 0827-0926	14	3.12	5.44E-03	1.46	3	0.49
2	4-28-95 / 1016-1116	64	15.30	7.54E-03	2.13	5	0.84
3	4-28-95 / 1317-1417	29	7.08	5.49E-03	1.57	5	0.84
Average		36	**8.50**	**6.16E-03**	**1.72**	**4**	**0.72**

[a] Concentration in parts per million

[b] Emission rate in pounds per hour

[c] Concentration in grains per dry standard cubic foot

Exhaust is in the 62.5" ID baghouse exhaust stack. The sampling ports are located located 156" downstream of the nearest flow disturbance and 39" upstream of the stack exhaust. Figure 3.1 is a depiction of the process and the sampling locations.

3.2 Passivation

The passivation process is used to treat round, angle, and shaped stainless steel bars to resist oxidation. The bars are placed in a tank containing 15% nitric acid and 3% hydrofluoric acid for 15-20 minutes. There are three of these acid dip tanks and each is maintained at 120°F. After acid dipping, the bars are transferred to a rinse tank where they are rinsed in water. This process gives the product a clean and passive surface to oxidation. Emissions from the process are exhausted through a dedicated 70,000 cfm mist eliminator for control of acid mists. Maximum capacity of the process is 9,000 lb/hour.

3.2.1 Stack Description

The passivation exhaust stack is 54" in diameter and the sampling ports are located located 100" downstream of the mist eliminator and 50" upstream of atmosphere. Figure 3.2 is a depiction of the process and the sampling locations.

4.0 DISCUSSION

4.1 EAF/AOD/General Exhaust

The intent of the testing was to follow each batch of stainless through the EAF and AOD cycles. During the melting period, the EAF stack was monitored for CO, NOx, and VOC. When the molten steel was transferred to the AOD, that stack was monitored for CO and NOx. The general exhaust stack was continuously monitored for CO and NOx through the entire EAF/AOD cycle.

NOx emissions at the general exhaust stack were not monitored during EAF/AOD Runs 1 and 2 due to failure of the NOx instrument. The replacement was equipped with a low (20ppm) range. Calibration gases had to be prepared using higher range Protocol 1 gases mixed with zero grade nitrogen. These prepared gases were certified with the calibrated instrument dedicated to the EAF/AOD stacks.

CO calibration gases were exhausted during EAF/AOD Run #2. A posttest calibration could not be performed until the following day upon receipt of new gases. Method 10 samples for the subsequent testing were taken in tedlar bags and analyzed using the new calibration gas to calibrate the CO analyzer.

The Protocol 1 certification data for the 91.7 ppm NOx calibration gas could not be found and the cylinder has since been returned. Mr. Cline noted the use of only Protocol 1 gases for the NOx analyzers while he was on site. Certification data for all other gases is presented in the QA/QC Appendix.

4.2 Passivation

The passivation system was tested during processing of three different grades of stainless steel, one per test, to demonstrate normal plant operations. The grade processed during Run 2 was intentionally formulated to produce maximum NOx emissions and is not typical of normal operations.

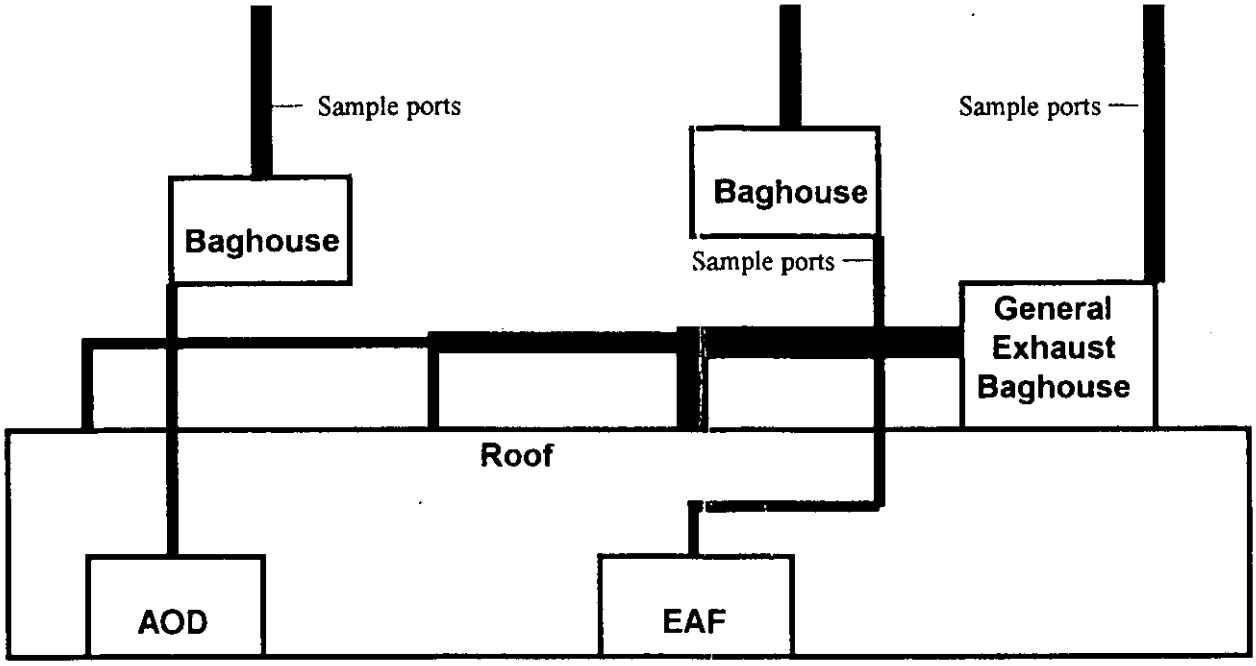


Figure 3.1 Simplified Melt Shop PM process schematic

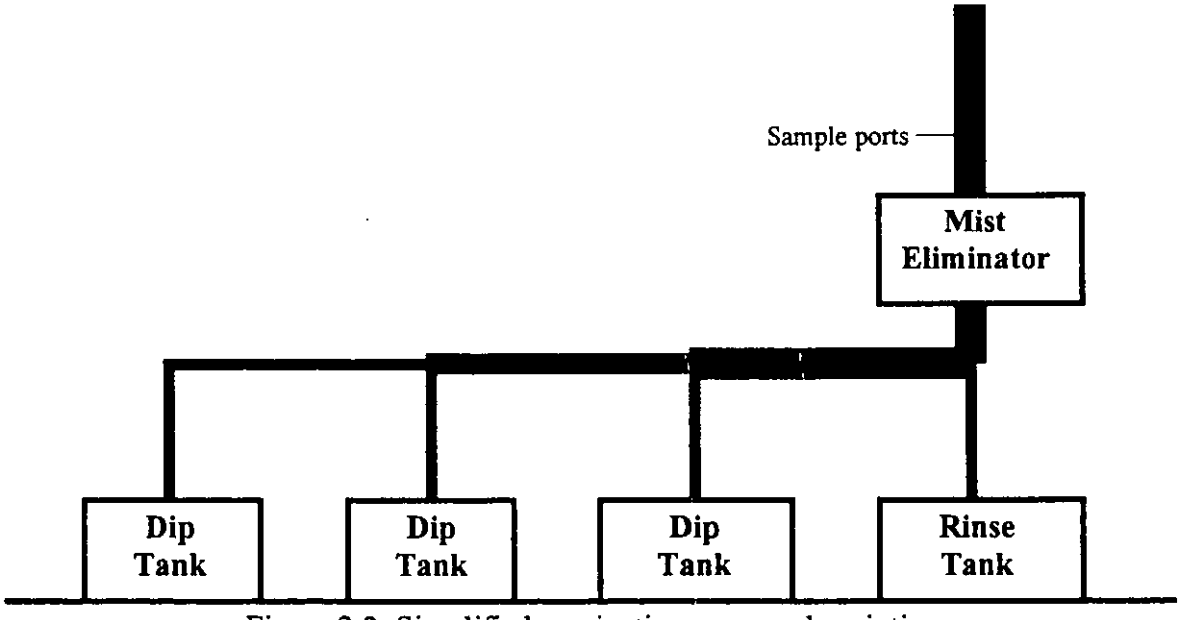


Figure 3.2 Simplified passivation process description

FBT

5.0 SAMPLING PROCEDURES

The sampling and analytical procedures used conform to the most recent revisions of USEPA Reference Methods for stationary sources. Specifically, USEPA Reference Methods 1, 2, 3, 4, 7E, 10, 26A, and the ASTM wet bulb/dry bulb procedure were used. A brief description of each procedure is included below:

5.1 Sampling Locations

Sampling locations and number of traverse points were determined using **USEPA Reference Method 1**, "Sample and Velocity Traverses for Stationary Sources."

5.2 Velocities and Volumetric Flow Rates

The stack gas velocity and volumetric flow rates were determined using **USEPA Reference Method 2**, "Determination of Stack Gas Velocity and Volumetric Flow Rate." The velocities were measured with "S" type pitot tubes and the temperatures were measured with calibrated type "K" thermocouples.

5.3 Dry Molecular Weight/Excess Air

The dry molecular weight was determined using **USEPA Reference Method 3**, "Gas Analysis for Carbon Dioxide, Oxygen, Excess Air, and Dry Molecular Weight." Grab samples were analyzed with fyrite gas analyzers for O_2 and CO_2 concentrations.

5.4 Moisture

The moisture at the Passivator exhaust was determined using **USEPA Method 4**, "Determination of Moisture Content in Stack Gases." The moisture at the EAF, AOD, and General Exhaust was determined using the **ASTM wet bulb/dry bulb** method.

5.5 Nitrogen Oxides

NO_x emissions were determined using **USEPA Method 7E**, "Determination of Nitrogen Oxide Emissions from Stationary Sources(Instrumental Analyzer Procedure)". A stack gas sample was withdrawn continuously from a single point and a portion directed to a chemilluminescent analyzer for NO_x measurement. All calibrations were performed using EPA Protocol 1 gas mixtures. Figure 3.1 depicts an instrumental analyzer sampling train.

5.6 Carbon Monoxide

CO emissions were determined using **USEPA Method 10**,"Determination of Carbon Monoxide Emissions from Stationary Sources". A stack gas sample was withdrawn continuously from a single point and a portion directed to a non-dispersive infrared (NDIR) analyzer for CO measurement. All calibrations were performed using certified gas mixtures. Figure 3.1 depicts an instrumental analyzer sampling train.

5.7 Volatile Organic Compounds

The volatile organic compounds (VOC) were determined using **USEPA Method 25A**, "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer(FIA)." A gas sample was extracted continuously from a single, representative point in the stack and a portion directed to the FID. The VOC concentration was analyzed, converted to an electrical signal, and recorded on a strip-chart recorder. Propane gas standards were used for

instrument calibrations and VOC concentrations, and emission rates, were reported relative to propane. All calibrations were performed using EPA Protocol 1 gas mixtures. Figure 3.2 depicts a Method 25A sampling train.

5.8 Particulate Matter/Hydrofluoric Acid

PM and HF emissions were determined using **USEPA Method 26A**, "Determination of Hydrogen Halide Emissions from Stationary Sources-Isokinetic Method". PM concentration was determined by gravimetric analysis of the filter and probe rinse. HF was collected in an acidic solution in the impingers of the sample train, then recovered and analyzed in the laboratory using an ion chromatograph(IC). Figure 3.3 depicts the Method 26A sampling train.

Appendix A contains the EAF/AOD/General Exhaust data.
Appendix B contains the Passivation data.
Appendix C contains the QA/QC data.

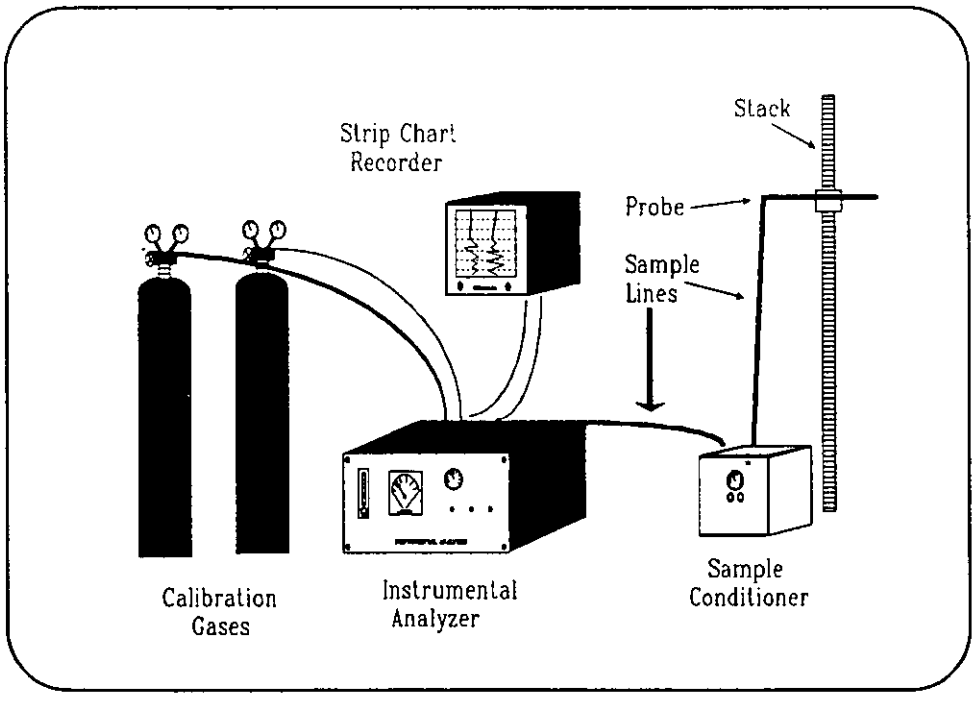


Figure 5.1 Instrumental analyzer sampling train

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100 North Senate Avenue
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www.state.in.us/idem

September 17, 2001

Mr. Bruce Kennedy
Slater Steels- Fort Wayne specialty Alloys Division
2400 Taylor Street West
Fort Wayne, IN 46801

Re: SMF 003-9460-00011
First Significant Permit Revision
FESOP 003-5725-00011

Dear Mr. Kennedy:

Slater Steels was issued a permit on June 25, 1997 for the operation of a stainless steel products manufacturing plant. A letter requesting a change was received on February 9, 1998.

In addition to the permit changes indicated in the Technical Support Document, Section B.10 "Compliance with Permit Conditions" has been changed as follows. The wording with a line thru it has been deleted and the bold has been added.

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.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

Part (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures. In order to track the FESOP rules instead of the Title V rules, "constitutes a violation of the Clean Air Act and" has been removed from the condition.

Also, all reference to Office of Air Management (OAM) has been changed to Office of Air Quality (OAQ).

Please find enclosed a copy of the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Walter Habeeb, at (317) 232- 8422.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
WVH
cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Cynthia Bymaster
Technical Support and Modeling - Michele Boner

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

Slater Steels
Fort Wayne Specialty Alloys Division
2400 Taylor Street West
Fort Wayne, Indiana 46802

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed 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 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F003-5725-00011	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: June 25, 1997 Expiration date: June 25, 2002

First Significant Permit Modification No.: SMF 003-9460-00011	Pages Affected: 2 through 31b, 36, 38, 38a, 39, 39 through 41, 42, 42a, and 43
Issued by: Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 17, 2001

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]
The Permittee owns and operates a stainless steel products manufacturing plant.

Responsible Official:	Bruce Kennedy
Source Address:	2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address:	P.O. Box 630, Fort Wayne, Indiana 46801
SIC Code:	3312
County Location:	Allen County
County Status:	Attainment for all criteria pollutants
Source Status:	Synthetic Minor Source, FESOP Program

A.2 Emission Units and Pollution Control Summary [326 IAC 2-8-3(c)(3)]
This stationary plant consists of the following emission units and pollution control devices:

(a) Melt Shop

(1) two (2) electric arc furnaces (ID# A1a and A1b), with A1b serving as a back-up. Each furnace has a maximum melting capacity of 10 tons per hour, equipped with a baghouse (ID# E1), and exhaust through stack E1;

(2) one (1) argon-oxygen decarburization furnace (ID# A2). This furnace has a maximum metal refining capacity of 10 tons per hour, is equipped with a baghouse (ID# E2), and exhausts through stack E2. This furnace has the capability of switching over to baghouse E1; and

(3) one (1) ingot molding operation (ID# A3). This operation has a maximum capacity of 10 tons per hour, is equipped with a baghouse (ID# E3), and exhausts through the building evacuation stack E3. During a 3/3 power curtailment, this operation exhausts through baghouse E2.

(b) Primary Mill

(1) one (1) ingot grinding operation (ID# B1). This operation has a maximum capacity of 13.2 tons per hour, is equipped with a dust collection house ID# E4, and exhausts through vent E4;

(2) eight (8) natural gas-fired preheat charge furnaces (ID#s B2a through B2h). The total maximum preheat capacity through all 8 furnaces is 13.2 tons per hour. Each furnace has a maximum heat input capacity of 31.6 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building;

(3) one (1) primary mill cobble burn operation (ID# B5). This operation has a maximum operation capacity of 0.8 tons per hour, is equipped with a baghouse (ID# E5), and exhausts through stack E5; and

(4) four (4) natural gas-fired annealing furnaces (ID#s B4a through B4d). The total maximum annealing capacity through all 4 furnaces is 13.2 tons per hour. Each furnace has a maximum heat input capacity of 13.0 million Btu per hour. The furnaces are not equipped with an air pollution control device and exhaust into the building.

(c) Billet Conditioning

(1) one (1) dry grinding operation (ID# C3). This operation has three grinding stations and has a total maximum capacity of 15.6 tons per hour. This operation is not equipped with any air pollution control device, and exhausts through vents E6, E7, and E8;

(2) one (1) CMI grinder (ID# C5). This grinder has a maximum capacity of 5.2 tons per hour, is equipped with a baghouse (ID# E8a), and exhausts into the building; and

(3) one (1) billet shot blasting operation (ID# C4). This operation has a maximum processing capacity of 14.0 tons of billets per hour, is equipped with a baghouse (ID# E9), and exhausts through stack E9.

(d) Continuous Bar Mill

(1) one (1) CBM cut-off saw (ID# D2). This saw has a maximum processing capacity of 8.0 tons of bars per hour, is equipped with a baghouse (ID# E10), and exhausts through stack E10; and

(2) one (1) natural gas-fired annealing furnace (ID# D3). This furnace has a maximum heat input capacity of 13.9 million Btu per hour, is not equipped with any air pollution control device, and exhausts into the building.

(e) Cold Finishing

(1) one (1) passivation system (ID# E3). This system has a maximum capacity of 5.0 tons of stainless steel bars per hour, is equipped with a mist eliminator (ID# E12), and exhausts through stack E12;

(2) one (1) old bar shot blasting operation (ID# E6). This operation has two blasting stations with a total maximum capacity of 3.4 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E15), and exhausts inside the building; and

(3) one (1) #1 shot blasting operation (ID# E7). This operation has a maximum capacity of 3.4 tons of stainless steel bar per hour, is equipped with a baghouse (ID# E16), and exhausts inside the building.

(4) a billet yard cobble burn operation (flame cutting of metal, ID# E5). This operation has a maximum capacity of 0.8 tons of stainless steel scrap per hour, is equipped with a baghouse (ID# E13), and exhausts through stack E13.

(f) Hilti Station

one (1) Hilti mold cleaning operation (ID# A4). This operation has a maximum capacity of 3.5 tons per hour, sis equipped with a baghouse (ID# E14), and exhausts through stack E14.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
This stationary plant also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) three (3) natural gas-fired boilers (ID#s 2, 3, and CDC boiler), with maximum heat input capacities less than or equal to 10.0 million Btu per hour (These insignificant units have applicable requirements in section D.7);

(b) natural gas-fired heat treat furnaces with heat input capacities less than or equal to 10 million Btu per hour;

(c) combustion source flame safety purging start up;

(d) a gasoline transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons;

(e) a petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month;

(f) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;

(g) refractory storage not requiring air pollution control equipment;

(h) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;

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

(j) cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kilopascals; 15 mm Hg; or 0.3 psi measured at 38 °C (I00 °F); or

(2) having a vapor pressure equal to or less than 0.7 kilopascal; 5 mm Hg; or 0.1 psi measured at 20 °C (68 oF);

the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(k) closed loop heating and cooling systems;

(l) forced and induced draft noncontact cooling tower system not regulated under a NESHAP;

(m) quenching operations used with heat treating processes;

(n) replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other

air filtration equipment;

(o) heat exchanger cleaning and repair;

(p) process vessel degassing and cleaning to prepare for internal repairs;

(q) paved roads and parking lots with public access;

(r) equipment used to collect any material that might be released during a malfunction, process upset, or spill clean up, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;

(s) blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower;

(t) furnaces used for melting metal other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume;

(u) a laboratory as defined in 326 IAC 2-7-1;

(v) safety clean parts washers for maintenance work;

(w) electro slag remelt operation;

(x) noncontact cooling towers used with chiller systems (no chromates);

(y) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations;

(z) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and

(aa) the Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation.

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations. (This insignificant activity has applicable requirements in section D.8).

A.4 FESOP Applicability [326 IAC 2-8-2]
This stationary plant, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions
(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

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 meaning 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 (prior to July 1, 1996, IC 13-7-1, IC 13-1-1-2), 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

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

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in conditions B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(a)(1)]

(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 July 1 of each year to:

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

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

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

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining 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 IDEM, OAQ, may require to determine the compliance status of the source, as specified in Sections D of this permit.

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 2-8-4(9)] [326 IAC 2-8-5(a)(1)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after the issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance 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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ.

B.14 Emergency Provision [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 of this permit;

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

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ, 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

The notice fulfills the requirement of 326 IAC 2-8-4(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.

(6) The Permittee immediately took all reasonable steps to correct the emergency.

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).

(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, OAQ, 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, OAQ, 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 326 IAC 2-8-12(g)(2)(B).

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

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

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

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

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

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. For the purpose of this permit, reports of deviations from a control device parameter range or from other requirements must be submitted using the Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.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 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 the IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards

or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(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, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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, OAQ 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) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, 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, OAQ, on or before the date it is due. [326 IAC 2-5-3]

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

(c) Right to Operate After Application of 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, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

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

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

B.19 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 the U.S. EPA.

B.20 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.

B.21 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at the 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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(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, OAQ, in the notices specified in 326 IAC 2-8-15(b)(1), (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 State Implementation Plan (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) and subject to the constraints in Section (a) of this condition and those in 326 IAC 2-8-15(d).

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

B.22 Construction Permit Requirement [326 IAC 2]
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.23 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, OAQ, 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 are 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)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee and IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 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, OAQ, 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. 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) IDEM, OAQ shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations [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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period;

(2) 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

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

(c) 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 Section D:

(a) Visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings,

(b) Visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Natural Gas Usage Limitation [326 IAC 2-8-4(1)]
The total natural gas usage for Slater Steels and IMS shall be limited to 1.0 billion cubic feet per 12 consecutive month period rolled on a monthly basis. This fuel usage limitation was taken by the company and is equivalent to NO_x emissions of 50.0 tons per 12 consecutive month period from natural gas combustion units only.

Due to the above limitation, the Part 70 (326 IAC 2-7) rules do not apply.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the 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.

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

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

(a) Compliance testing shall be conducted on the melt shop operations for the PM within 180 days after issuance of the permit. The Permittee shall perform the tests specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures) and by methods in the approved test protocol.

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 prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ 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, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible

official" as defined by 326 IAC 2-7-1(34).

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

C.11 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 may extend compliance schedule an additional ninety (90) days provided the Permittee 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, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

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

C.12 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.13 Monitoring Methods [326 IAC 3]
Any monitoring or testing performed to meet the applicable 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.14 Pressure Gauge Specifications
Whenever a condition in this permit requires the taking 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 20 percent of full scale and be accurate within plus or minus two percent (± 2%) of full scale reading.

C.15 Fugitive Dust Emissions from Steel Scrap Handling
Fugitive particulate emissions from the handling of rusty steel scrap shall be controlled by applying water on the scrap pile on an "as needed" basis or by any equivalent corrective action contained in Slater Steels' fugitive dust control plan.

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

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air 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.

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

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

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

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

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

C.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
If a regulated substance, subject to 40 CFR 68, is present in a process 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 2-8-5(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, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being

properly implemented.

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

C.18 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5] [326 IAC 1-6]

(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, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. 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.19 Actions Related to Noncompliance Demonstrated by a Stack Test
[326 IAC 2-8-4] [326 IAC 2-8-5]

(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, OAQ, 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, OAQ 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, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ 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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.20 Natural Gas Usage
The Permittee shall maintain monthly records of source-wide natural gas usage and natural gas usage for the previous12 months. This shall determine on-going compliance with operation condition C.6 - Natural Gas Usage Limitation.

C.21 Quarterly Reporting
The Permittee shall submit within thirty (30) days after the end of the quarter being reported a summary to document compliance with operation condition C.6 - Natural Gas Usage Limitation, using the enclosed form or its equivalent. The report shall include the source-wide monthly natural gas usage and the natural gas usage for the previous 12 months, for each month in a quarter.

C.22 Monitoring Data Availability

(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, OAQ, 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.23 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that 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.24 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in sections C and 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, OAQ, 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 as described in Section B - Deviations from Permit Requirements and Conditions must be clearly identified in such reports.

(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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.25 Compliance with 40 CFR 82 [326 IAC 22-1]

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

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS

Melt Shop Facility Description [326 IAC 2-8-4(10)]

(1) two (2) electric arc furnaces (ID# A1a and A1b), with A1b serving as a back-up. Each furnace has a maximum melting capacity of 10 tons per hour, equipped with a baghouse (ID# E1), and exhaust through stack E1;

(2) one (1) argon-oxygen decarburization furnace (ID# A2). This furnace has a maximum metal refining capacity of 10 tons per hour, is equipped with a baghouse (ID# E2), and exhausts through stack E2. This furnace has the capability of switching over to baghouse E1; and

(3) one (1) ingot molding operation (ID# A3). This operation has a maximum capacity of 10 tons per hour, is equipped with a baghouse (ID# E3), and exhausts through the building evacuation stack E3. During a 3/3 power curtailment, this operation exhausts through baghouse E2.

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

D.1.1 Melt Rate Limitation

The metal melt rate through the melt shop shall be limited to 81,500 tons per 12 consecutive month period rolled on a monthly basis. This limitation was taken by the company and is equivalent to the following emission limitations:

Pollutant	Affected Melt Shop Operation	Emission Limitation (lb/ton)
PM-10 (filterable and condesible)	(a) EAF (ID# A1) and AOD (ID# A2 combined	1.31
	(b) Ingot molding	0.11
NO_x	entire melt shop	0.51
CO	entire melt shop	2.17

Due to the above limitation, the Part 70 Rules (326 IAC 2-7) do not apply.

D.1.2 Particulate Matter

Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the melt shop operations shall not exceed the following limitations:

Melt Shop Operation	326 IAC 6-3-2 limit (lbs/hr)
Electric arc furnace (EAF, ID# A1)	19.2
Argon-oxygen decarburzation (AOD) furnace (ID# A2)	19.2
Ingot molding (ID# A3)	19.2

Compliance Determination Requirements

The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when the pressure drop reading is outside of the range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six months.

(b) Inlet temperature to each baghouse

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the inlet gas temperature for each baghouse shall not exceed 275 °F to prevent overheating of the bags. The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when the inlet temperature reading exceeds 275 °F for any one reading.

(c) Air flow rate through the baghouse

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the air flow rate through each baghouse shall be maintained within the range of 150,000 and 250,000 actual cubic feet per minute, as determined during the stack test, to assure good capture of particulate emissions and yet will not exceed the proper air to cloth ratio for the baghouse. The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when the air flow rate reading is outside of the range for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.1.8 Melt Rate
The Permittee shall maintain records of the monthly melt rate and the melt rate of the melt shop for the previous 12 months, for each month. This shall determine on-going compliance with operation condition D.1.1.

D.1.9 Dust Collector Operational Parameters
The following records shall be maintained to demonstrate on-going compliance with operation condition D.1.1 and D.1.2:

(a) pressure drop (inlet/outlet differential static pressure) across each baghouse;

(b) temperature of inlet gas to each baghouse;

(c) air flow rate through each baghouse;

(d) daily visible emissions observations;

(e) weekly external baghouse unit, ductwork and associated components visible emission observations; and

(f) checklist with dates and initials for each Preventive Maintenance Plan action performed.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at

D.1.3 Performance Testing [326 IAC 2-8-5(1)]
Within 180 days of the issuance of this permit, the Permittee shall perform a PM test on the electric arc furnace per a method approved by the Commissioner. This is to establish the following baghouse operating parameters that will achieve a minimum control efficiency that corresponds to the PM-10 emission limit in operation conditions D.1.1:

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse; and

(b) Air flow rate through each baghouse.

PM emissions are equal to PM-10 emissions for this case.

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

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation.

D.1.5 Daily Visible Emission Notations
Daily visible emission notations at the melt shop stacks (i.e., E1, E2, and E3) shall be performed once per shift. A trained employee shall record whether emissions are "normal" or "abnormal". For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting start-up or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation specified in the unit specific condition prescribing visible emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of "normal" visible emissions for that specific process. The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when an "abnormal" emission is observed.

D.1.6 Weekly Visible Emissions Notations
Weekly visible emissions notations similar to 40 CFR 60, Appendix A, Method 22 on the melt shop building, roof monitors, external baghouse unit, cyclone, scavenger system ductwork and associated component (e.g., hoppers, etc.) for evidence of fugitive emissions, holes, corrosion, audible leaks, and the like, shall be performed. This does not require the use of a certified visible emissions reader.

The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when visible emissions are observed.

D.1.7 Daily Monitoring of Baghouse Operational Parameters
The respective baghouses as described in condition A.2(a) and in the facility description box of section D.1 shall be operated at all times when the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding facilities are in operation. The Permittee shall daily (once per shift) monitor the following parameters:

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the range of 5.0 and 9.0 inches of water or a range established during the latest stack test.

least 5 years and made available upon IDEM's request.

D.1.10 Quarterly Reporting

The Permittee shall submit quarterly reports within thirty (30) days after the end of the quarter being reported. These reports shall include the following:

(a) A summary to document compliance with operation conditions D.1.1, using the enclosed form or its substantial equivalent. This shall include the monthly melt rate and the melt rate of the melt shop for the previous 12 months, for each month in a quarter.

(b) Time and duration of all instances of readings that were outside of the indicated performance criteria ranges and a certification that appropriate corrective actions were promptly taken or a certification that all readings were within the indicated ranges.

Quality Control [326 IAC 2-8-5]

D.1.11 (a) All instruments and equipment shall be calibrated, maintained, and operated according to the manufacturer's specification.

(b) An Operation and Preventive Maintenance Plan implementation shall be available to the IDEM upon request and shall include:

(1) inspection checklists

(2) operator standard operating procedures

(3) spare parts inventory

(c) An equipment Corrective Action Contingency Plan shall be drafted in anticipation of control equipment malfunctions and shall be implemented on an as needed basis.

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

D.5.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
That a Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, is required for the passivation system, old bar shot blasting operation, #1 shot blasting operation, and billet yard cobble burn operation.

D.5.5 Daily Monitoring of Surface Tension of Each Passivation Bath
That the chemical suppression blanket for NO_x shall be added to each passivation bath at all times when the passivation system is in operation. The Permittee shall daily maintain the surface tension of the passivation bath such that the surface tension does not exceed 24 dynes per centimeter. This is to determine on-going compliance with operation condition D.5.2, in the absence of any NO_x compliance test. The Preventive Maintenance Plan for the passivation system shall contain troubleshooting contingency and corrective actions for when the surface tension is greater than 24 dynes per centimeter for any one reading.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [26 IAC 2-8-16]

D.5.6 Surface Tension of Each Passivation Bath
The Permittee shall maintain daily records, except on Saturdays, Sundays, and major holidays (i.e., New Year's Day, Good Friday, Labor Day, Thanksgiving Day, and Christmas Day) of the surface tension of each passivation bath to determine on-going compliance with operation condition D.5.2.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

D.5.7 Quarterly Reporting
That the Permittee shall submit quarterly reports within thirty (30) days after the end of the quarter being reported. These reports shall include the time and duration of all instances of readings that were outside of the indicated performance criteria ranges and a certification that appropriate corrective actions were promptly taken or a certification that all readings were within the indicated ranges.

SECTION D.7 FACILITY OPERATION CONDITIONS

insignificant activities:	Facility Description [326 IAC 2-8-4(10)]
three (3) natural gas-fired boilers (ID#s 2, 3, and CDC boiler), with maximum heat input capacities less than or equal to 10.0 million Btu per hour. These boilers do not have any air pollution control device and exhaust through stacks E15, E16, and CDC boiler stack, respectively.	

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

D.7.1 Particulate Matter

(a) Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from indirect heating facilities existing and in operation before September 21, 1983 (i.e., boiler #2) shall not exceed 6.4 pounds per million Btu.

(b) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Indirect Heating Facilities), the particulate matter (PM) emissions from indirect heating facilities constructed after September 21, 1983 (i.e., boiler #3 and CDC boiler), shall not exceed 0.6 and 0.5 pounds per million Btu, respectively.

Compliance Determination Requirements

D.7.2 Testing Requirements [326 IAC 2-8-5(1)]
Testing of the boilers is not specifically required by this permit. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

SECTION D.8 FACILITY OPERATION CONDITIONS

insignificant activities: Facility Description [326 IAC 2-8-4(10)]

Continuous Draw Cell (CDC) Line, which includes a precoat operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation.

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations.

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

D.8.1 Particulate Matter
Pursuant to 326 IAC 6-3-2 (Particulate emission limitations for process operations), the particulate matter (PM) emissions from the sawing operation shall not exceed 21.9 pounds per hour.

Compliance Determination Requirements

D.8.2 Testing Requirements [326 IAC 2-8-5(1)]
Testing of the CDC Line operations is not specifically required by this permit. However, this does not preclude testing requirements on these facilities under 326 IAC 2-1-4(f) and 326 IAC 2-8-4).

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

FESOP Quarterly Report

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
FESOP No.: F003-5725-00011
Facility: Melt Shop
Parameter: metal melt rate
Limit: 81,500 tons per 12 consecutive month period rolled on a monthly basis

Year: _____

Month	Monthly metal melt rate (tons) A	Metal melt rate for the previous 11 months (tons) B	Total metal melt rate for the 12 month period (tons) C = A + B
1			
2			
3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FESOP Quarterly Report

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
FESOP No.: F003-5725-00011
Facility: entire Slater Steels
Parameter: annual natural gas usage
Limit: 1,000 million cubic feet (MMcf) per 12 consecutive month period rolled on a monthly basis

Year: _____

Month	Monthly natural gas usage (MMcf) A	Natural gas usage for the previous 11 months (MMcf) B	Total natural gas usage for the 12 month period (MMcf) C = A + B
1			
2			
3			

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address: P.O. Box 630, Fort Wayne, Indiana 46801
FESOP No.: F003-5725-00011

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

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ 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: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address: P.O. Box 630, Fort Wayne, Indiana 46801
FESOP No.: F003-5725-00011

This form consists of 2 pages **Page 1 of 2**

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

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

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

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_x, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

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

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

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

Source Name: Slater Steels - Fort Wayne Specialty Alloys Division
Source Address: 2400 Taylor Street West, Fort Wayne, Indiana 46802
Mailing Address: P.O. Box 630, Fort Wayne, Indiana 46801
FESOP No.: F003-5725-00011

Months: _____ **to** _____ **Year:** _____

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

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g., Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

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

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document for First Significant Permit Modification of the Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Slater Steels - Fort Wayne Specialty Alloys Division	
Source Location:	2400 Taylor Street West, Fort Wayne, Indiana 46802	
County:	Allen County	
Permit No.:	F-003-5725-00011	Issued: June 25, 1997
Revision No.	SMF-003-9460	
SIC Code:	3312	
Permit Reviewer:	Marco A. Salenda	

Source Definition

The source consists of a stainless steel products manufacturing plant with an on-site contractor:

(1) Slater Steels - Fort Wayne Specialty Alloys Division ("Slater Steels"), the primary operation, is located at 2400 Taylor Street West, Fort Wayne, Indiana; and

(2) International Mill Service, Inc. ("IMS"), the supporting operation, is also located at 2400 Taylor Street West, Fort Wayne, Indiana.

IDEM has determined that Slater Steels and IMS are under the common control of Slater Steels. These two plants are considered one source due to contractual control. Therefore, the term "source" in the FESOP documents and any modifications thereof refers to both Slater Steel and IMS as one source.

Separate FESOPs were issued to Slater Steels and IMS solely for administrative purposes.

History

On June 25, 1997, IDEM issued a FESOP to Slater Steels. On November 6, 1997, an official stack test was performed on Slater Steels' electric arc furnace (EAF), identified as A1a, to determine compliance with the PM-10 FESOP limit. This test showed that EAF is in noncompliance with the PM-10 limitation. On February 9, 1998, Slater Steels submitted an application to modify its FESOP and fix the melt shop PM-10 limit, among other things.

Changes Proposed

~~old language~~ is struck out
new language is bolded for emphasis

(a) The Office of Air Management (OAM) has reviewed an application from Slater Steels relating to the requested revisions of its FESOP and is making the following changes:

(1) In reference to condition D.1.1 - Melt Rate Limitation of the FESOP, the total

PM-10 emission limitation for the entire melt shop is revised from 0.46 pound per ton to 1.42 pounds per ton. This change is brought about by a result of noncompliance from a stack test performed on the EAF baghouse (ID# E1) on November 6, 1997. The results of the test show that the total PM-10 emissions (filterable and condensible) from the EAF after the baghouse as 1.05 pounds per ton of metal produced. This is well above the FESOP limit of 0.46 pound per ton for the entire melt shop. A new limit of 1.42 pound per ton is established and is broken down as follows:

Melt Shop Operation	PM-10 Limit
Electric Arc Furnace (ID# A1)	1.05
Argon-Oxygen-Decarburization Furnace (ID# A2)	0.26
Ingot Molding (ID# A3) - General Evacuation	0.11
Total Melt Shop PM-10 Limit	1.42

The PM-10 portion for the AOD and General Evacuation are conservative estimates based on the nature of the processes and are considered to be on the high end compared to stack test results performed by the U. S. EPA , Office of Air Quality and Planning Standards, on a similar AOD furnace operated by Carpenter Technology Corporation, Reading, Pennsylvania. Results of the test show total PM-10 emissions of 0.11 pound per ton of metal produced.

In addition to the change in the PM-10 limit, the melt shop melt rate limit of 81,500 tons is changed such that it is based on a 12 consecutive month period rolled on a monthly basis, instead of 365 consecutive day period rolled on a daily basis. IDEM has determined that this should be sufficient to determine compliance with the underlying FESOP limits. The record keeping and reporting requirements are revised accordingly.

Conditions D.1.1, D.1.8, and D.1.10 are revised to reflect the above changes, as follows:

D.1.1 Melt Rate Limitation

That the metal melt rate through the melt shop shall be limited to 81,500 tons per ~~365 consecutive day period rolled on a daily basis~~ **12 consecutive month period rolled on a monthly basis**. This limitation was taken by the company and is equivalent to ~~PM-10, NO_x, and CO emissions of 0.46 pounds per ton after the baghouse, 0.51 pounds per ton without a NO_x control device, and 2.17 pounds per ton without a CO control device, respectively, for the melt shop only.~~ **the following emission limitations:**

Pollutant	Affected Melt Shop Operation	Emission Limitation (lb/ton)
PM-10 (filterable and condesible)	(a) EAF (ID# A1) and AOD (ID# A2 combined	1.31
	(b) Ingot molding	0.11
NO_x	entire melt shop	0.51
CO	entire melt shop	2.17

Due to the above limitation, the Part 70 Rules (326 IAC 2-7) do not apply.

D.1.8 Melt Rate
That the Permittee shall maintain records of the ~~daily~~ **monthly** melt rate and the melt rate of the melt shop for the previous ~~365 days~~ **12 months**, for each ~~day~~ **month**. This shall determine on-going compliance with operation condition D.1.1.

D.1.10 Quarterly Reporting
That the Permittee shall submit quarterly reports within thirty (30) days after the end of the quarter being reported. These reports shall include the following:

(a) A summary to document compliance with operation conditions D.1.1, using the enclosed form or its substantial equivalent. This shall include the ~~daily~~ **monthly** melt rate and the melt rate of the melt shop for the previous ~~365 days~~ **12 months**, for each ~~day~~ **month** in a quarter.

(b) Time and duration of all instances of readings that were outside of the indicated performance criteria ranges and a certification that appropriate corrective actions were promptly taken or a certification that all readings were within the indicated ranges.

(2) The baghouse pressure differential and air flow ranges are specified on the compliance monitoring condition for the melt shop, as determined during the recent stack test. Conditions D.1. is revised as follows:

D.1.7 Daily Monitoring of Baghouse Operational Parameters
That the respective baghouses as described in condition A.2(a) and in the facility description box of section D.1 shall be operated at all times when the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding facilities are in operation. The Permittee shall daily (once per shift) monitor the following parameters:

(a) Pressure drop (inlet/outlet differential static pressure) across each baghouse

Unless operated under conditions for which the Preventive

Maintenance Plan specifies otherwise, the pressure drop across each baghouse shall be maintained within the **range of 5.0 through 9.0 inches of water or a** range established during the latest stack test. The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when the pressure drop reading is outside of the range for any one reading.

The instrument used for determining the pressure shall comply with Condition C.14 - Pressure Gauge Specifications, be subject to approval by IDEM, OAM, and shall be calibrated at least once every six months.

* * *

(b) Air flow rate through the baghouse

Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the air flow rate through each baghouse shall be maintained within the range of 150,000 and 250,000 actual cubic feet per minute, as determined during the stack test, ~~that will~~ **to** assure good capture of particulate emissions and yet ~~will~~ not exceed the proper air to cloth ratio for the baghouse. The Preventive Maintenance Plan for the electric arc furnaces, argon-oxygen decarburization furnace, and ingot molding operation shall contain troubleshooting contingency and corrective actions for when the air flow rate reading is outside of the range for any one reading.

(3) The potential to emit PM-10 accounted for the Passivation System is changed from 0.4 to 7.04 tons per year. When the PTE was originally calculated for this facility, the emission factor used should have given the potential emissions after control, instead this factor was used to determine the potential emissions before controls then a 95 % control efficiency was factored in to determine the potential emissions after controls.

(4) Relax the record keeping requirement for the passivation system (ID# E3) in section D.5, as follows:

D.5.6 Surface Tension of Each Passivation Bath
The Permittee shall maintain daily records, **except on Saturdays, Sundays, and major holidays (i.e., New Year's Day, Good Friday, Labor Day, Thanksgiving Day, and Christmas Day)** of the surface tension of each passivation bath to determine on-going compliance with operation condition D.5.2.

Records of corrective actions shall be kept on a form approved by IDEM and shall be kept for at least 5 years and made available upon IDEM's request.

IDEM has agreed to the above change since Slater Steels' has provided enough

daily records to show that the surface tension of each passivation bath has never come close to reaching the surface tension limit of 24 dynes per centimeter and due to the frequency of addition of chemical suppression blanket needed to stay below the surface tension limit, IDEM believes that keeping records of the surface tension daily, except on weekends and major holidays, is sufficient to determine continuous compliance with the underlying limit.

(5) The source-wide natural gas usage limit of 1.0 billion cubic feet is changed such that it is based on a 12 consecutive month period rolled on a monthly basis, instead of 365 consecutive day period rolled on a daily basis. IDEM has determined that this should be sufficient to determine compliance with the underlying FESOP limits. The record keeping and reporting requirements are revised accordingly. Conditions C.6 - Natural Gas Usage Limitation, C.20 - Natural Gas Usage, and C.21 - Quarterly Reporting are revised as follows to reflect this change:

C.6 Natural Gas Usage Limitation

The natural gas usage for the entire source shall be limited to 1.0 billion cubic feet per ~~365 consecutive day period rolled on a daily basis~~ **12 consecutive month period rolled on a monthly basis.** This fuel usage limitation was taken by the company and is equivalent to NO_x emissions of 50.0 tons per ~~365 consecutive day~~ **12 consecutive month** period from natural gas combustion units only.

Due to the above limitation, the Part 70 (326 IAC 2-7) rules do not apply.

C.20 Natural Gas Usage

The Permittee shall maintain ~~daily~~ **monthly** records of source-wide natural gas usage and natural gas usage for the previous ~~365 days~~ **12 months.** This shall determine on-going compliance with operation condition C.6 **- Natural Gas Usage Limitation.**

C.21 Quarterly Reporting

The Permittee shall submit within thirty (30) days after the end of the quarter being reported a summary to document compliance with operation condition C.6, using the enclosed form or its equivalent. The report shall include the source-wide ~~daily~~ **monthly** natural gas usage and the natural gas usage for the previous ~~365 days~~ **12 months**, for each ~~day~~ **month** in a quarter.

(6) Add the following insignificant activities (item z and aa) under section A..3 - Insignificant Activities of the FESOP and add section D.8, which would list all the requirements applicable to the CDC Line:

(z) any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs; and

(aa) the Continuous Draw Cell (CDC) Line, which includes a precoat

operation, a draw bench operation, an initial alkaline cleaning operation, a straightening operation, a sawing operation, chamfering operation, an intermediate alkaline cleaning operation, an oxidizing operation, and a final alkaline cleaning operation.

(1) The precoat operation utilizes a calcium hydroxide (lime) aqueous solution, which does not contain any VOC or HAP, to protect the steel bars during the drawing operation.

(2) The draw bench operation uses small amount of oil, a nonvolatile material, to protect the drawing dies from scratching.

(3) The three (3) alkaline operations utilize HAP-free aqueous solutions containing 1% by weight of VOC.

(4) The sawing operation is attached to a baghouse (ID# CDC-BH) that has a design maximum outlet grain loading of 0.0004 gr/dscf and a gas flow rate of 2,942 actual cubic feet of air per minute.

(5) The oxidizing operation uses nitric acid solution to oxidize the surface of stainless steel bars. It is designed with water curtains as an integral part of the process to recover and neutralize nitric acid fumes and to prevent cross contamination with the intermediate and final alkaline cleaning operations. (This insignificant activity has applicable requirements in section D.8).

(b) In addition to the above changes, IDEM is also updating the FESOP per the latest FESOP model permit dated June 5, 1998. The following changes are as follows:

SECTION A SOURCE SUMMARY

(1) The first paragraph of Section A - Source Summary is revised as follows:

This permit is based on information ~~presented in the permit application and any information~~ requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAM) ~~and submitted to IDEM, OAM~~. **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

(2) In reference to A.3 - Insignificant Activities, rule citation 326 IAC 2-7-1(20) is changed to 326 IAC 2-7-1(21).

(3) A.5 - Prior Permit Conditions Superseded is replaced by A.5 - Prior Permit Conditions as follows:

A.5 ~~Prior Permit Conditions Superseded~~ **Prior Permit Conditions**

~~[326 IAC 2]~~
~~This permit supersedes the conditions of all construction and operating permits issued under 326 IAC 2 prior to the issuance date of this permit.~~

(a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

(4) Condition B.1 - General Requirements is replaced with B.1 - Permit No Defense as follows:

B.1 ~~General Requirements [IC 13-15] [IC 13-17] (Prior to July 1, 1996: IC 13-7 and IC 13-1-1)~~
~~The permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.~~

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.

(5) Condition B.6 - Severability is revised as follows:

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

~~(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.~~

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.

(6) Condition B.8 - Duty to Supplement and Provide Information, item (c), is revised as follows:

(c) Upon ~~written~~ 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,~~ **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** the Permittee ~~shall~~ **must** furnish such records ~~directly~~ to ~~both 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, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

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

(7) In reference to condition B.11 - Certification, 326 IAC2-8-5(a)(1) is added as a rule cite, and items (b) and (c) are revised as follows:

(b) ~~This certification shall be submitted~~ **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(~~33~~ **34**).

(8) In reference to condition B.12 - Annual Compliance Certification, item (a) is revised as follows:

(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 **shall cover the time period from January 1 to December 31 of the previous year, and** shall be submitted in letter form no later than July 1 of each year to:

* * *

Item (b) is revised as follows:

(b) ~~This~~ **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 ~~delivered by any method and received and stamped by IDEM, OAM,~~ 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.**

Item (c)(3) is revised as follows:

(c)(3) Whether compliance was **based on** continuous or intermittent **data**;

(9) In reference to condition B.13 - Preventive Maintenance Plan, item (a) is revised as follows:

(a) **If required by specific condition(s) in Section D of this permit,** ~~The~~ **the** Permittee shall prepare~~,~~ **and** maintain ~~and implement~~ Preventive Maintenance Plans within ninety (90) days after the issuance of this permit, including the following information on each **facility**:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and~~ emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

~~(3) 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.

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

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

A new Item (b) is added as follows:

(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) In reference to condition B.14 - Emergency Provision, item (b)(4) and (b)(5) are revised as follows:

(b)(4) For each emergency lasting ~~longer than~~ one (1) hour **or more**, the Permittee notified IDEM, OAM, within four (4) daytime business hours ~~by telephone or facsimile~~ after the beginning of the emergency, or after the emergency ~~is~~ **was** discovered or reasonably should have been discovered;

* * *

(b)(5) For each emergency lasting ~~longer than~~ one (1) hour **or more**, the Permittee submitted written notice or facsimile of the emergency to:

* * *

Items (d) and (f) are also revised as follows:

(d) This emergency provision supersedes ~~any emergency or upset provision contained in~~ 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.

(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** ~~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.

(11) Condition B.15 - Deviations from Permit Requirements and Conditions is revised 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) **A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

(1) **An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**

(2) **An emergency as defined in 326 IAC 2-7-1(12); or**

(3) **Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**

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

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

(c) Written notification shall be submitted ~~using~~ **on** the attached **Emergency/**Deviation Occurrence Reporting Forms or ~~their~~ **its** substantial equivalent. For the purpose of this permit, reports of deviations from a control device parameter range ~~must be submitted using the Deviation Occurrence Reporting Form for Control Equipment Only (State Form 47739) or its substantial equivalent. Reports of deviations~~ **or** from other requirements must be submitted using the **Emergency/**Deviation Occurrence Reporting Form ~~(State Form 47741)~~ or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**

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

(12) In reference to condition B.16 - Permit Modification, Reopening, Revocation and Reissuance, or Termination, item (b) is revised as follows:

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 ~~(prior to July 1, 1996, in IC 13-7-10-5)~~ or if the IDEM, OAM, determines any of the following:

* * *

(13) In reference to condition B.17 - Permit Renewal, items (a) and (b) are revised as follows:

(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**) **and 326 IAC 2-7-1(40)**.

* * *

(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]

* * *

(14) Conditions B.18 - Administrative Permit Amendment, B.19 - Minor Permit Modification, and B.20 - Significant Permit Modification are deleted and replaced by a new condition B.18 - Permit Amendment or Modification, as follows:

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

~~(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 permit modification to this permit shall follow the procedures specified under 326 IAC 2-8-11(b)(1)(A) through (F).~~

~~(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 the change is subject to the construction permit requirements of 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)]~~

~~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, and review by the U.S. EPA, as they apply to permit issuance and renewal.~~

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management**

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

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

(15) In reference to condition B.21 - Permit Revision Under Economic Incentives and Other Programs (renumbered as B.19), rule citation 326 IAC 2-8-11(b) is revised to 326 IAC 2-8-11(b)(2).

(16) In reference to condition B.22 - Changes Under Section 502(b)(10) of the Clean Air Act (renumbered as B.20), the first paragraph is revised as follows:

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:

* * *

(17) In reference to condition B.23 - Operational Flexibility (renumbered as B.21), item (b) is revised as follows:

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

* * *

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**).

Item (e) is added as follows:

(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.

(18) Condition B.24 - Construction Permit Requirement (renumbered as B.22) is revised as follows:

B.22 Construction Permit Requirement [326 IAC ~~2-1~~ **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 permitted as required by and in accordance with 326 IAC 2.

(19) In reference to condition B.25 - Inspection and Entry (renumbered as B.23), the opening paragraph is revised s follows:

Upon presentation of ~~IDEM~~ 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:

* * *

Item (e) is revised as follows:

(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)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

(20) In reference to condition B.26 - Transfer of Ownership or Operation (renumbered as B.24), item (b) is revised 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. 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).**

(21) Condition B.27 - Annual Fee Payment (renumbered as B.25) is revised as follows:

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, ~~consistent with the fee schedule established in 326 IAC 2-8-16~~ **within**

thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) 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 due date, the~~ **The** Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-5674 (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.~~

SECTION C SOURCE OPERATION CONDITIONS

(22) Condition C.3 - Open Burning is revised as follows:

C.3 Open Burning **[326 IAC 4-1] [IC 13-17-9]**
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC **4-1-6.The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.**

(23) Condition C.5 - Fugitive Dust Emissions is revised as follows:

C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall ~~be in violation of 326 IAC 6-4 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(c)].~~ **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.**

(24) In reference to condition C.6 - Natural Gas Usage Limitation, 326 IAC 2-8-4(1) is added as a rule cite.

(25) Condition C.7 - Operation of Equipment is revised as follows:

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

~~(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, all air pollution control equipment listed in this permit shall be operated at all times that the emission unit(s) vented to the control equipment is in operation.~~

~~(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.~~

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

(26) In reference to condition C.8 - Stack Height, items (b) and (c) are deleted.

(27) Condition C.9 - Asbestos Abatement Projects - Accreditation and condition C.16 - Asbestos Abatement Projects are combined into a new condition C.9 - Asbestos Abatement Projects as follows:

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

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

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

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

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the 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.

(28) Condition C.10 - Performance Testing is revised as follows:

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

(a) Compliance testing shall be conducted on the melt shop operations for the PM within 180 days after issuance of the permit. The Permittee shall perform the tests specified in this permit to demonstrate compliance with the applicable rule or permit condition. All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures)

and by methods in the approved test protocol.

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

~~at least~~ **no later than** thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.** ~~[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.

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

(29) Condition C.11 - Compliance Monitoring is revised as follows:

C.11 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 **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notify:

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

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

(30) Condition C.12 - Maintenance of Monitoring Equipment is revised as follows:

C.12 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(a)(iii)]

(a) ~~The Permittee shall perform all necessary maintenance and make all necessary attempts to keep all required monitoring equipment in proper operating condition at all times.~~ 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. ~~Preventive maintenance plans of the monitors shall be implemented.~~ In addition, prompt ~~correction~~ **corrective action** ~~as indicated,~~ shall be initiated ~~within the time frames specified,~~ whenever ~~the parameters monitored fall outside of the~~ indicated ~~values~~.

(31) Condition C.13 - Monitoring Methods is revised as follows:

C.13 Monitoring Methods [326 IAC 3]

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

(32) Condition C.16 - Asbestos Abatement Projects is deleted. This condition is combined with condition C.9 - Asbestos Abatement Projects.

(33) A new condition C.16 - Emergency Reduction Plans is added to the permit because the source has the potential to emit particulate matter (PM) more than 100 tons per year, as a result of the adjustment of PM limits for the melt shop. The revised PTE is found in the Updated Limited PTE Section of this TSD. The new condition reads as follows:

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

**Indiana Department of Environmental Management
Compliance Branch, Office of Air 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.

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

(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.

(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]

(34) Condition C.17 - Risk Management Plan is revised as follows:

C.17 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
If a regulated substance, **subject to 40 CFR 68,** is present in **a process in** more than ~~a~~ **the** threshold quantity, ~~that is subject to~~ 40 CFR 68 **is an applicable requirement and the Permittee shall:**

(a) ~~40 CFR 68 is an applicable requirement;~~ **Submit:**

~~(b) The Permittee shall 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 requirement 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.

~~(c)~~ **(b)** Provide annual certification to IDEM, OAM, that the Risk Management is being properly implemented.

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

(35) Condition C.18 - Compliance Monitoring Plan - Failure to Take Corrective Action (re-titled as Compliance Monitoring Plan - Failure to Take Response Steps) is revised as follows:

C.18 Compliance Monitoring Plan - Failure to Take ~~Corrective Action~~ **Response Steps** [326 IAC 2-8-4~~(3)~~] **[326 IAC 2-8-5] [326 IAC 1-6]**

(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~~ **response steps**~~, as described in the Preventive Maintenance Plan,~~ 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 within the prescribed time contained within the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** shall constitute a violation of the permit unless taking the ~~corrective actions~~ **response steps** set forth in the ~~Preventive Maintenance Plan~~ **Compliance Response Plan** would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee ~~may be~~ **is** excused from taking further ~~corrective actions~~ **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 actions~~ **response steps** ~~is~~ **are** required.

(d) Records shall be kept of all instances in which the ~~action values~~ **compliance related information** ~~were~~ **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.

(36) Condition C.19 - Actions Related to Noncompliance Demonstrated by a Stack Test is revised as follows:

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-8-4] [326 IAC 2-8-5]**

(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~~. **The Permittee shall submit** ~~A~~ **a** description of these corrective actions ~~shall be submitted~~ to IDEM, OAM within thirty (30) days of receipt of the test results. **The Permittee shall take** ~~These corrective actions shall be implemented immediately unless notified by IDEM, OAM that they are not acceptable. The Permittee shall make every effort~~ **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~~ **authority to use** enforcement activities to resolve the noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(37) In reference to condition C.22 - Monitoring Data Availability, items (a) and (b) are revised as follows:

(a) **With the exception of performance tests conducted in accordance with Section C- Performance Testing** ~~All~~ **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) ~~When the equipment listed in Section D is not operating,~~ **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.

(38) Condition C.23 - General Record Keeping Requirements is revised as follows:

C.23 General Record Keeping Requirements

(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 **and available upon request of an IDEM, OAM representative.** ~~They~~ **The records** may be stored elsewhere for the remaining two (2) years ~~providing~~ **as long as** they are ~~made~~ available ~~within thirty (30) days after written~~ **upon** request. **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

* * *

(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 ~~any required preventive maintenance and corrective actions that were implemented. Such records shall briefly describe what was done and indicate who did it. Such~~ **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, ~~quality assurance procedures, quality control procedures,~~ **parts inventories, and** operator's standard operating procedures~~,~~ ~~manufacturer's specifications or their equivalent, and equipment "troubleshooting" guidance~~. **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.

• • •

(39) Condition C.24 - General Reporting Requirements is revised as follows:

C.24 General Reporting Requirements **[326 IAC 2-8-4(3)(C)]**

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

~~(a)~~ **(b)** ~~Unless otherwise specified in this permit,~~ **The report required in (a) of this condition and** reports required by conditions in sections C and 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

~~(b)~~ **(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]~~

~~(c)~~ **(d)** Unless otherwise specified in this permit any quarterly report shall be submitted within thirty (30) days of the end of the ~~three (6) month~~ reporting period.

~~(d)~~ **(e)** All instances of deviations ~~from any requirements of this permit~~ **as described in Section B - Deviations from Permit Requirements and Conditions** must be clearly identified in such reports;

~~(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.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

REPORTING FORMS

(40) The quarterly report forms are revised to accommodate the changes to the melt shop limitation and natural gas usage limitation.

(41) The two (2) Deviation Occurrence Report Forms are replaced by the Emergency/Deviation Occurrence Report Form.

(42) The Annual Certification Form is updated.

(43) A new form, Quarterly Compliance Monitoring Report Form, is added for the purpose of complying with condition C.24 - General Reporting Requirements.

TABLE OF CONTENTS

(44) The Table of Contents is revised accordingly to reflect the above changes.

(c) There are no changes to be made on the FESOP issued to IMS.

Enforcement Issue

There are no pending enforcement actions against the source.

Recommendation

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

Emissions Calculations

See Appendices A and B (Emissions Calculation Spreadsheets) for detailed calculations (seven pages).

Updated Limited PTE

The following table summarizes the latest PTE for the source:

	Limited PTE (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
electric arc furnace (EAF)	42.8	42.8	28.5	13.1	59.1	16.3	3.1
argon-oxygen decarburization furnace (AOD)	10.6	10.6	---	---	23.6	4.1	0.6
ingot molding	4.6	4.6	---	---	5.7	0.2	0.6
ingot grinding	8.8	8.8	---	---	---	---	---
charge furnaces, annealing furnaces, and boilers	6.0	6.0	0.3	2.6	10.5	50.0	---
primary mill cobble burn	0.0	0.0	---	---	---	---	---
dry grinding	7.4	7.4	---	---	---	---	1.1
CMI grinder	0.0	0.0	---	---	---	---	0.0
billet shot blasting	0.1	0.1	---	---	---	---	0.1
CBM cut-off saw	0.0	0.0	---	---	---	---	0.0
passivation system	7.0	7.0	---	---	---	19.2	3.0
old bar shot blast	0.1	0.1	---	---	---	---	0.0
#1 bar shot blast	0.1	0.1	---	---	---	---	0.0
billet yard cobble burn	0.0	0.0	---	---	---	---	0.0
hilti mold cleaning	0.0	0.0	---	---	---	---	---
CDC Line (insignificant activity)	0.0	0.0	---	0.0	---	---	---
IMS	22.7	10.5	---	---	---	---	---
Total Source	110.2	98.0	28.8	15.7	98.9	89.8	9.8 combined
Total Limited PTE	< 250	< 100	< 100	< 100	< 100	< 100	< 10 single/ < 24 combined

Federal Rule Applicability

There are no changes in Federal rule applicability from the original FESOP.

State Rule Applicability

(a) The following state rule applies to the CDC boiler:

326 IAC 6-2-4 (Particulate emission limitations for indirect heating facilities)
This rule applies to the CDC boiler since it is constructed after September 21, 1983. This rule requires that the particulate matter (PM) emissions from CDC boiler shall not exceed 0.5 pound per million Btu.

Based on emission calculations, the CDC boiler will comply with the rule.

(b) The following state rule applies to the CDC Line sawing operation:

326 IAC 6-3-2 (Particulate emission limitations for process operations)
This rule requires that particulate matter (PM)emissions from the sawing operation to not exceed 21.9 pounds per hour.

Based on emission calculations, the CDC Line will comply with the rule.

Compliance Monitoring

There are no new compliance monitoring requirements necessary for the new CDC Line, an insignificant activity.

Air Toxic Emissions

There are no changes in the air toxic emissions due to this modification.

Conclusion

Due to the modifications, pages 31b, 38a, and 42a have been added. The modifications of this source will be subject to the conditions of the attached proposed **FESOP Minor Modification Permit No. SMF-003-9460-00011.**