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## TITLE 326 AIR POLLUTION CONTROL BOARD

#### SECOND NOTICE OF COMMENT PERIOD

#04-278(APCB)

# DEVELOPMENT OF AMENDMENTS TO 326 IAC 6-1-10.1 CONCERNING MODIFICATIONS TO PARTICULATE MATTER EMISSION LIMITATIONS AT ASF-KEYSTONE, INC., HAMMOND, INDIANA

#### PURPOSE OF NOTICE

The Indiana Department of Environmental Management (IDEM) has developed draft rule language for amendments to 326 IAC 6.8-2-4 (formerly 326 IAC 6-1-10.1) concerning particulate matter emission limitations (PM<sub>10</sub>) for coil manufacturing processes at ASF-Keystone, Inc., located in Hammond, Indiana. By this notice, IDEM is soliciting public comment on the draft rule language. IDEM seeks comment on the affected citations listed and any other provisions of Title 326 that may be affected by this rulemaking.

#### **HISTORY**

First Notice of Comment Period: November 1, 2004, Indiana Register (28 IR 678).

**CITATIONS AFFECTED:** 326 IAC 6-1-10.1; 326 IAC 6.8-2-4.

**AUTHORITY:** IC 13-14-8; IC 13-17-3-4.

#### SUBJECT MATTER AND BASIC PURPOSE OF RULEMAKING

#### **Basic Purpose and Background**

ASF-Keystone, Inc. (ASF) has requested that IDEM make revisions to particulate matter (PM<sub>10</sub>) emission limitations in 326 IAC 6.8-2-4 (formerly 326 IAC 6-1-10.1) for their coil springs manufacturing facility in Hammond, Indiana. IDEM has recently proposed to repeal 326 IAC 6-1 and replace it with two (2) new articles, 326 IAC 6.5 and 326 IAC 6.8 (28 IR 326). All sources located in Lake County will be placed in the new article 6.8 and this notice reflects these proposed changes. The source has requested that IDEM increase the particulate matter (PM<sub>10</sub>) emission limitations in 326 IAC 6.8-2-4 (formerly 326 IAC 6-1-10.1) for the small coil manufacturing line and decrease the PM<sub>10</sub> emission limitations for the large and medium coil manufacturing lines, resulting in a net reduction in allowable emissions. ASF is proposing a decrease of one and seventy-five hundredths pounds of PM<sub>10</sub> per hour (1.75 lbs PM<sub>10</sub>/hr) and one and five-hundredths pounds of PM<sub>10</sub> per hour (1.05 lbs PM<sub>10</sub>/hr) for the large and medium coil lines, respectively. ASF is proposing an increase of one and three-hundredths pounds of PM<sub>10</sub> per hour (1.03 lbs PM<sub>10</sub>/hr) for the small coil line. The proposed limits more closely reflect actual emissions, based on recent stack tests, while maintaining a reasonable degree of certainty that ASF will be able to ensure continuous compliance with the proposed limits. The proposed limits also provide a reduction in total allowable emissions from these processes. No modeling is needed because the emissions from these sources are modeled as volume sources, and the changes would have no negative impact on the model since the total emissions would be decreased. ASF will need to request a permit modification once the revised limits are effective and approved by U.S. EPA.

ASF has also requested that the pound per ton (lb/ton) limits be removed from the rule for each coil line. The request was made because the pound per ton limit is not necessary since the coil lines' emissions are not necessarily related solely to the tonnage of coil produced. The emissions are more dependent on the number of springs being quenched and their corresponding surface areas than their tonnage. Also, the pound per hour (lb/hr) limits are derived using the pound per ton (lb/ton) limits multiplied by their respective maximum production rates; therefore, the pound per hour (lb/hr) limits are as stringent as the pound per ton (lb/ton) limits. This will satisfy U.S. EPA's stringency criteria for removal of rules or rule sections from the Indiana State Implementation Plan (SIP).

ASF is also requesting that IDEM remove the miscellaneous coil manufacturing process from the rule as this process no longer exists at this facility.

## Identification of Restrictions and Requirements Not Imposed Under Federal Law

No element of the draft rule imposes either a restriction or a requirement on persons to whom the draft rule applies that is not imposed under federal law. The decrease in allowable emissions from the medium and large coil manufacturing lines does not impose a new requirement, but provides a mechanism to increase the allowable emissions from the small coil line.

## **Potential Fiscal Impact**

There should be no fiscal impact since stack test show that the source is already meeting the proposed emission limits for all three coil manufacturing lines.

# **Public Participation and Workgroup Information**

No workgroup is planned for the rulemaking. If you feel that a workgroup or other informal discussion on the rule is appropriate, please contact Susan Bem, Rules Section, Office of Air Quality at (317) 233-5697 or (800) 451-6021 (in Indiana).

## SUMMARY/RESPONSE TO COMMENTS FROM THE FIRST COMMENT PERIOD

IDEM requested public comment from November 1, 2004, through December 2, 2004, on alternative ways to achieve the purpose of the rule and suggestions for the development of draft rule language. IDEM received no comments in response to the first notice of public comment period.

## REQUEST FOR PUBLIC COMMENTS

This notice requests the submission of comments on the draft rule language, including suggestions for specific revisions to language to be contained in the draft rule. Mailed comments should be addressed to:

#04-278(APCB)ASF-Keystone PM10 SIP

Susan Bem

c/o Administrative Assistant

Rules Section

Air Programs Branch

Office of Air Quality

Indiana Department of Environmental Management

P.O. Box 6015

Indianapolis, Indiana 46206-6015.

Hand delivered comments will be accepted by the receptionist on duty at the Tenth floor reception desk, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana.

Comments may be submitted by facsimile at the IDEM fax number: (317) 233-2342, Monday through Friday, between 8:15 a.m. and 4:45 p.m. Please confirm the timely receipt of faxed comments by calling the Rules Section at (317) 233-0426.

#### COMMENT PERIOD DEADLINE

Comments must be postmarked, faxed, or hand delivered by February 2, 2005.

Additional information regarding this action may be obtained from Susan Bem, Rules Section, Office of Air Quality, (317) 233-5697 or (800) 451-6027 (in Indiana).

## DRAFT RULE

SECTION 1. 326 IAC 6.8-2-4 IS AMENDED TO READ AS FOLLOWS:

# 326 IAC 6.8-2-4 ASF-Keystone, Inc.-Hammond

Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11

Affected: IC 13-15; IC 13-17

Sec. 4. American Steel Foundry ASF-Keystone, Inc.-Hammond in Lake County shall meet the following emission limits:

Source	Emission Limit (Units)	Emission Limit (lbs/hr)
Stack serving coil spring grinder numbers 3-0386 and 3-0389	1.083 lbs/ton	0.045
Stack serving coil spring grinder number 3-0244	0.021 lbs/ton	0.040
Tub grinder number 3-0388	0.015 lbs/ton	2.00
Coil spring grinder number 3-0247	0.019 lbs/ton	0.03
Coil spring grinder number 3-0249	3.792 lbs/ton	1.82
Coil spring grinders numbers 3-0385, 3-295, and 3-0233	0.019 lbs/ton	0.05
Shot blast peener number 3-1804	0.011 lbs/ton	0.06
Shot blast peener number 3-1811	0.018 lbs/ton	0.06

Shot blast peener number 3-1821	0.016 lbs/ton	0.06
Shot blast peener number 3-1823	0.016 lbs/ton	0.06
Small coil manufacturing (ESP number 3-3024)	0.014 lbs/ton	<del>0.02</del> <b>1.05</b>
Medium coil manufacturing (ESP number 3-3027)	0.700 lbs/ton	<del>2.10</del> <b>1.05</b>
Large coil manufacturing (ESP number 3-3028)	0.700 lbs/ton	<del>3.50</del> <b>1.75</b>
Miscellaneous coil manufacturing (ESP number 3-3026)	0.700 lbs/ton	<del>1.05</del>
(Air Pollution Control Board; 326 IAC 6.8-2-4)		

## Notice of First Meeting/Hearing

Under IC 4-22-2-24, IC 13-14-8-6, and IC 13-14-9, notice is hereby given that on April 6, 2005, at 1:00 p.m., at the Indiana Government Center-South, 402 West Washington Street, Conference Center Room A, Indianapolis, Indiana the Air Pollution Control Board will hold a public hearing on amendments to 326 IAC 6.8-2-4 (formerly 326 IAC 6-1-10.1).

The purpose of this hearing is to receive comments from the public prior to preliminary adoption of these rules by the board. All interested persons are invited and will be given reasonable opportunity to express their views concerning the proposed amendments. Oral statements will be heard, but, for the accuracy of the record, all comments should be submitted in writing.

Additional information regarding this action may be obtained from Susan Bem, Rules Section, Office of Air Quality, (317) 233-5697 or (800) 451-6027 (in Indiana).

Individuals requiring reasonable accommodations for participation in this event should contact the Indiana Department of Environmental Management, Americans with Disabilities Act coordinator at:

Attn: ADA Coordinator

Indiana Department of Environmental Management

100 North Senate Avenue

P.O. Box 6015

Indianapolis, Indiana 46206-6015

or call (317) 233-0855 or (317) 232-6565 (TDD). Speech and hearing impaired callers may contact IDEM via the Indiana Relay Service at 1-800-743-3333. Please provide a minimum of 72 hours' notification.

Copies of these rules are now on file at the Office of Air Quality, Indiana Department of Environmental Management, Indiana Government Center-North, 100 North Senate Avenue, Tenth Floor East, and Legislative Services Agency, One North Capitol, Suite 325, Indiana polis, Indiana and are open for public inspection.