INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

June 16, 2004

TO: Interested Parties / Applicant

RE: Electric Coatings Technologies, Inc / 089-19266-00373

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

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June 16, 2004

Mr. Thomas A. Modrowski
Electric Coating Technologies, LLC
4407 Railroad Avenue
East Chicago, IN 46312-2654

Re: **089-19266-00373**
Third Notice Only Change to
Registration No. 089-13740-00373

Dear Mr. Modrowski:

Electric Coating Technologies, LLC, was issued a registration on October 12, 2001, for a continuous coil electrogalvanizing source. An application was received April 7, 2004, requesting that the emission statement condition be removed from the permit due to the revisions to 326 IAC 2-6 (Emission Reporting) which became effective on March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement condition will be removed from the permit**.** Pursuant to the provisions of 326 IAC 2-5.5-6(d) the registration is hereby administratively amended as follows:

Condition No. 3 has been removed and the remaining conditions renumbered:

~~3. Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).~~

All other conditions of the permit shall remain unchanged and in effect. The revised Registration is attached. 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 Janet Mobley at 317-232-8369 or at 1-800 451-6027 extension 2-8369.

Sincerely,

Original Signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

PD/jm
cc: File - Lake County
Lake County Health Department
Air Compliance Section Inspector – Rick Massoels
Compliance Data Section
IDEM Northwest Regional Office
Permit Review Section II – Janet Mobley

June 16, 2004

Mr. Kenneth Paxson
Electric Coating Technologies L.L.C.
4407 Railroad Avenue
East Chicago, IN 46312

Re: **089-19266-00373**
Third Notice Only Change
Registered Operation Status
089-13740-00373

Dear Mr. Paxson:

An application requesting that the emission statement condition be removed from the permit due to revisions to 326 IAC 2-6 (Emission Reporting) was received on April 7, 2004. The following is a revision of the registration removing Condition No. 3 and renumbering the remaining conditions:

The application from Great Lakes Metals, LLC (a previous owner), received on January 3, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5, it has been determined that the following continuous coil electrogalvanizing source, located at 4407 Railroad Avenue, East Chicago, Indiana, is classified as registered:

(a) Two (2) natural gas fired boilers, identified as SS-2 and SS-3, constructed after June 9, 1989, equipped with low NO_X burners, capacity: 21.0 million British thermal units per hour, each.

(b) One (1) electrogalvanizing line, consisting of pre-cleaning, cleaning, and phosphate processes, as well as zinc plating operations, capacity: 163.2 tons of galvanized steel per hour.

(c) Two (2) natural gas fired space heaters, identified as #1 West and #2 East, capacity: 8.80 million British thermal units per hour, each.

The following conditions shall be applicable:

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

   (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

2. Any change or modification which may increase the potential to emit a combination of HAPs, VOC, NO_X, SO_2, PM or PM_{10} to twenty five (25) tons per year, CO to one hundred (100) tons per year, or a single HAP to ten (10) tons per year from this source shall require approval from IDEM, OAQ prior to making the change.

3. Pursuant to 326 IAC 6-3-2 (Process Operations), the particulate matter (PM) from the electrogalvanizing line shall not exceed 0.76 pounds per hour, when operating at a process weight rate of 163.2 pounds per hour. This limitation was determined by the following:

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

   $E = 4.10\ P^{0.67}$

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

4. Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the PM from each of the two (2) boilers shall be limited to 0.412 pounds per million British thermal unit of heat input. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

   $$Pt = 1.09/Q^{0.26}$$

   where:

   Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

   Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

5. Operating on fuels other than natural gas may cause the requirements of 40 CFR 60.42c, 40 CFR 60.43c, 40 CFR 60.44c, 40 CFR 60.45c, 40 CFR 60.46c and 40 CFR 60.47c to be applicable to the two (2) boilers, identified as SS-2 and SS-3, and shall require prior IDEM, OAQ, approval.

6. Pursuant to the New Source Performance Standards (NSPS), Part 60.48c, Subpart Dc, this source is required to keep records of the amount of each fuel combusted each month. Records shall be maintained by the owner or operator of the boilers for a period of two (2) years following the date of such record. The application and enforcement of these standards have been delegated to the IDEM OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

7. To document compliance with Condition 6, the natural gas fired boiler certification, shall be submitted semi-annually, using the form located at the end of this letter, or its equivalent, within thirty (30) days after the end of the six (6) month period being reported. The

certification shall be sent to:

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

This registration is a revised registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Branch
Office of Air Quality
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

cc: File - Lake County
Lake County Health Department
Air Compliance Section - Ramesh Tejuja
IDEM Northwest Regional Office
Compliance Data Section
Permit Review II - Janet Mobley

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH

SEMI-ANNUAL NATURAL GAS-FIRED BOILER CERTIFICATION

Source Name: Electric Coating Technologies, L.L.C.
Source Address: 4407 Railroad Avenue, East Chicago, Indiana 46312
Mailing Address: 4407 Railroad Avenue, East Chicago, Indiana 46312
Permit No.: R 089-13740-00373

Natural Gas Only Alternate Fuel burned From: _____ To: _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

Registration
Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

Company Name:	**Electric Coating Technologies L.L.C.**
Address:	**4407 Railroad Avenue**
City:	**East Chicago**
Authorized individual:	**Kenneth Paxson**
Phone #:	**(219) 378-1930 ext. 111**
Registration #:	**R 089-13740-00373**

I hereby certify that Electric Coating Technologies L.L.C. is still in operation and is in compliance with the requirements of Registration 089-13740-00373.

Name (typed):
Title:
Signature:
Date: