



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: March 1, 2005

RE: Brandenburg Industrial Service Company / 089-19781-00176

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

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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



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

---

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[www.IN.gov/idem](http://www.IN.gov/idem)

Ms. Jessica Zvyak  
Brandenburg Industrial Service Company  
P. O. Box M908  
Gary, IN 46401

March 1, 2005

Re: Permit Modification No: **089-19781-00176**  
of SSM 089-16450-00176

Dear Ms. Zvyak:

Brandenburg Industrial Service Company, located at One North Broadway TS 670, Gary, Indiana 46402, applied for a permit modification of the Significant Source Modification SSM 089-16450-00176, issued on December 31, 2003. The permit modification is to revise the volatile organic compound (VOC) emission limitation of the paint booths by increasing it from 0.5 tons/year to 2.5 tons/year and still maintain the non-applicability of 326 IAC 2-3 (Emission Offset). There is no construction of new units involved in this proposed modification.

Pursuant to the provisions of 326 IAC 2-1.1-2 and IC 13-15-7-1, a permit modification is hereby approved as described in the attached Technical Support Document (TSD) and TSD Addendum. Please find enclosed the entire modified permit document for final issuance.

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 Ms. Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692 or by e-mail at [icalilun@dem.state.in.us](mailto:icalilun@dem.state.in.us).

Sincerely,

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

Attachments - Modified Permit, TSD and TSD Addendum

cc: File - Lake County  
U.S. EPA, Region V  
Lake County Health Department  
NWRO  
Air Compliance Section Inspector - RGM  
Compliance Branch - KA  
Technical Support and Modeling - MB



Mitchell E. Daniels, Jr.  
 Governor

Thomas W. Easterly  
 Commissioner

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 (800) 451-6027  
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**PERMIT MODIFICATION of a  
 PART 70 SIGNIFICANT SOURCE MODIFICATION  
 OFFICE OF AIR QUALITY**

**Brandenburg Industrial Service Company  
 - A Contractor for U.S. Steel - Gary Works  
 One North Broadway TS 670  
 Gary, Indiana, 46402**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Significant Source Modification No.: 089-16450-00176	
Original Issued and Signed by Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: December 31, 2003

Permit Modification No.: <b>089-19781-00176</b>	
Issued by: Original signed by  Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 1, 2005



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**SECTION A**

**SOURCE SUMMARY**

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information contained in conditions A.1, A.3 and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a scrap steel processing operation.

Responsible Official:	President
Source Address:	One North Broadway TS 670, Gary, Indiana 46402
Source Mailing Address:	One North Broadway TS 670, Gary, Indiana 46402
General Source Phone Number:	(219) 881-0200
SIC Code:	1795 and 5093
County Location:	Lake
Source Location Status:	Nonattainment for SO <sub>2</sub> , Nonattainment for 1-hour ozone standard Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD Rules, and Emission Offset Rules, Major Source, Section 112 of the Clean Air Act 1 of 28 Listed Source Categories

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

This scrap steel processing operation is an on-site contractor :

- (a) US Steel, Gary Works, 089-00121, the primary operation, is located at One North Broadway, Gary, IN 46402; and
- (b) Brandenburg Industrial Service Company, 089-00176, the supporting operation, is located at One North Broadway, Stop 670, Gary, IN 46402

IDEM has determined that US Steel, Gary Works and Brandenburg Industrial Service Company, are under the common control of US Steel, Gary Works. These two plants are considered one source due to contractual control. Therefore, the term "source" in this permit refers to both US Steel -Gary Works and Brandenburg Industrial Service.

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

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) paint booth (identified as Unit 002) used for coating metal trailers and lunch boxes, using airless spray guns to apply primer and air atomization spray guns to apply finish coats, with a maximum paint usage of 3.63 gallons of primer per hour and 1.4 gallons of finish coat per hour. Emissions of particulate are controlled using dry filters, which exhaust to stacks PBES-01 and PBES-02. The paint booth was constructed in 2002.
- (b) One (1) enclosed blast booth (identified as Unit 003), equipped with two (2) blast guns each having a maximum capacity of 240 square feet of metal per hour and 105.4 pounds of steel grit per minute per nozzle. Particulate emissions are controlled by a dust collector, which exhausts inside the building. The blast booth was constructed in 2002.

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

This modification to this stationary source does not include any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

<b>SECTION B</b>	<b>GENERAL CONSTRUCTION CONDITIONS</b>
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**B.1** Definitions [326 IAC 2-7-1]

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

**B.2** Effective Date of the Permit [326 IAC 13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**B.3** Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

**B.4** Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
- (e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:
  - (1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.
  - (2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification

will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.

- (3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

<b>SECTION C</b>	<b>GENERAL OPERATION CONDITIONS</b>
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C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or

potential to emit. The PMP does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

C.4 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM<sub>10</sub> emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on December 13, 1996.

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on December 13, 1996.

C.8 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 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 by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.10 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

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- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.11 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

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

### C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

### C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

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

### C.14 Emergency Provisions [326 IAC 2-7-16]

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- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or regional office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

Northwest Regional Office  
Telephone Number: 1-888-209-8892, or  
Telephone Number: (219) 881-6712  
Facsimile Number: (219) 881-6745

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]**

**[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

### **C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (b) 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.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) paint booth (identified as Unit 002) used for coating metal trailers and lunch boxes, using airless spray guns to apply primer and air atomization spray guns to apply finish coats, with a maximum paint usage of 3.63 gallons of primer per hour and 1.4 gallons of finish coat per hour. Emissions of particulate are controlled using dry filters, which exhaust to stacks PBES-01 and PBES-02. The paint booth was constructed in 2002.
- (b) One (1) enclosed blast booth (identified as Unit 003), equipped with two (2) blast guns each having a maximum capacity of 240 square feet of metal per hour and 105.4 pounds of steel grit per minute per nozzle. Particulate emissions are controlled by a dust collector, which exhausts inside the building. The blast booth was constructed in 2002.

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

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

#### D.1.1 Emission Offset and PSD Limitations [326 IAC 2-3][326 IAC 2-2]

- (a) The amount of VOC used in the Paint Booth (identified as Unit 002) shall not exceed 2.5 tons per year, with compliance determined at the end of each month.
- (b) The PM and PM<sub>10</sub> emissions shall be limited as follows:
  - (1) The PM and PM<sub>10</sub> emissions from the Paint Booth (identified as Unit 002) shall not exceed 0.21 pounds per hour. This limit is equivalent to 0.92 tons per year.
  - (2) The PM and PM<sub>10</sub> emissions from the Blast Booth (identified as Unit 003) shall not exceed 0.13 pounds per hour, which is equivalent to 0.57 tons per year.
- (c) Pursuant to 326 IAC 2-3-2(b), the VOC emissions increases for the five (5) calendar year period 1999 to 2004 plus the emission increase from the current modification resulted in emission increases less than the de minimis, therefore this modification is considered a minor modification for Emission Offset (326 IAC 2-3).

Compliance with conditions (a), (b) and (c) makes 326 IAC 2-3 (Emission Offset), and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this modification.

#### D.1.2 Particulate Emissions [326 IAC 6-1-2(a)]

Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Emission Limitations for General Sources), the particulate matter emissions from the Paint Booth (identified as Unit 002) and Blast Booth (identified as Unit 003) shall not exceed 0.03 grains per dry standard cubic foot.

#### D.1.3 Miscellaneous Metal Coating [326 IAC 8-2-9]

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Pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are not applicable to the Paint Booth (identified as Unit 002). If at any time the amount of VOC used in the Paint Booth exceeds fifteen (15) pounds per day, the Permittee shall notify the IDEM, OAQ of the change in operation and shall comply with the requirements of 326 IAC 8-2-9.

### Compliance Determination Requirements

#### D.1.4 Particulate Control

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- (a) In order to comply with Conditions D.1.1(b)(1) and D.1.2, the dry filters used to control particulate emissions shall be in operation and control emissions from the Paint Booth at all times the Paint Booth is in operation.
- (b) In order to comply with Conditions D.1.1(b)(2) and D.1.2, the dust collectors used to control particulate emissions shall be in operation and control emissions from the Blast Booth at all times the Blast Booth is in operation.

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

#### D.1.5 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1(a) and D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1(a) and D.1.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
  - (1) The VOC content of each coating material and solvent used.
  - (2) The amount of coating material and solvent used on daily basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
  - (3) The total VOC usage for each day; and
  - (4) The weight of VOCs emitted each month.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.6 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition D.1.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name:                    Brandenburg Industrial Service Company  
                                      - A Contractor for U.S. Steel - Gary Works  
Source Address:                One North Broadway TS 670, Gary Indiana 46402  
Mailing Address:                One North Broadway TS 670, Gary Indiana 46402  
Source Modification No.:      089-16450-00176

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

Please check what document is being certified:

- Test Result (specify) \_\_\_\_\_
- Report (specify) \_\_\_\_\_
- Notification (specify) \_\_\_\_\_
- Affidavit (specify) \_\_\_\_\_
- Other (specify) \_\_\_\_\_

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

Signature:

Printed Name:

Title/Position:

Date:

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

**Part 70 Source Modification Quarterly Report**

Source Name: Brandenburg Industrial Service Company  
 - A Contractor for U.S. Steel - Gary Works  
 Source Address: One North Broadway TS 670, Gary Indiana 46402  
 Mailing Address: One North Broadway TS 670, Gary Indiana 46402  
 Source Modification No.: 089-16450-00176  
 Facility: Paint Booth (Unit 002)  
 Parameter: Volatile Organic Compounds (VOC)  
 Limit: 2.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: \_\_\_\_\_

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue, Indianapolis, Indiana 46204  
Phone: 317-233-5674, Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Brandenburg Industrial Service Company  
- A Contractor for U.S. Steel - Gary Works  
Source Address: One North Broadway TS 670, Gary Indiana 46402  
Mailing Address: One North Broadway TS 670, Gary Indiana 46402  
Source Modification No.: 089-16450-00176

**This form consists of 2 pages**

**Page 1 of 2**

<input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none"><li>· The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li>· The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
--

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

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

Brandenburg Industrial Service Company  
Gary, Indiana  
Permit Writer: Iryn Calilung

Page 20 of 20  
Permit Modification 089-19781-00176  
of SSM 089-16450-00176

**Page 2 of 2 Part 70 Operating Permit Emergency Occurrence Report**

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

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

A certification is not required for this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

Technical Support Document (TSD) for a  
Permit Modification of a  
Part 70 Significant Source Modification

**Source Background and Description**

Source Name:	Brandenburg Industrial Service Company - A contractor of U.S. Steel - Gary Works
Source Location:	One North Broadway TS 670, Gary, Indiana 46402
Mailing Address:	P. O. Box M908, Gary, IN 46401
County:	Lake
SIC Code:	5093 and 1795
Permit Modification No.:	089-19781-00176 of SSM 089-16450-00176, issued on December 31, 2003
Permit Writer:	Iryn Calilung 317/233-5692 icalilun@dem.state.in.us

**Source Definition**

On December 31, 2003, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) determined that US Steel - Gary Works and the Brandenburg Industrial Service Company are considered one source due to the contractual agreement between the two (2) companies.

- (1) US Steel - Gary Works, the primary operation, is located at One North Broadway, Gary, Indiana 46402; and
- (2) Brandenburg Industrial Service Company, the supporting operation, is located at One North Broadway, TS-670, Gary, Indiana 46402.

There is no change with this previous determination due to this permit modification.

**Permitting History of the Paint Booth**

On December 31, 2003, Brandenburg Industrial Service Company was issued an approval (Significant Source Modification 089-16450-00176) to replace the existing painting operation with a paint booth used for coating metal trailers. The VOC emissions of this paint booth have been limited to less than 0.5 tons per year, such that the requirements under 326 IAC 2-3 (Emission Offset) do not apply.

**Proposed Permit Modification**

On October 12, 2004, the Office of Air Quality (OAQ) received an application from Brandenburg Industrial Service Company to revise the existing VOC limits of the paint booths by increasing it from 0.5 tons/year to 2.5 tons/year and still maintain the non-applicability of 326 IAC 2-3 (Emission Offset).

**Re-evaluation of the VOC Emissions**

The following table shows the comparison of the VOC emissions between the existing permit and proposed revision:

Table 1 - - VOC Emissions of the Paint Booth (tons/year)			
		Existing (SSM 089-16450-00176) December 31, 2003	Proposed (089-19781-00176) <i>pending</i>
1	PTE of the Paint Booths Without Limit/Control	75.3	75.3
2	PTE of the Paint Booths Specified in the Permit	0.5	2.5
3	Past Actual Emissions	0.38	0.449
4	Net Emissions Increase from the Paint Booths	0.12	2.051
Emission Offset Significant Level		25.0	25.0

- (1) There is no change in the uncontrolled/unlimited potential to Emit (PTE) of the paint booth operating at 8760 hours per year.
- (2) Brandenburg Industrial Service Company had agreed to limit the emissions from the paint booth. The existing permit (SSM 089-16450-00176) specified the VOC limit for the paint booth to be 0.5 tons/year.

Brandenburg Industrial Service Company requested that the VOC limit be increased to 2.5 tons/year.

- (3) The average actual emissions of the paint booths used for the original permit review were 0.38 tons/year. The decrease comes from the decommissioning of the previous painting operation.

The actual emissions of the Paint Booth for 2004 is 0.449 tons per year.

- (4) The Net emissions Increase From the Paint booths is the difference between (PTE of the Paint Booths Specified in the Permit) and (Past Actual Emissions).

$$\text{VOC Net Emissions} = (0.5 - 0.38) = 0.12 \text{ tons/year}$$

$$\text{VOC Net Emissions} = (2.5 - 0.449) = 2.051 \text{ tons/year}$$

The net emissions increases from the paint booths in both cases are less that the VOC emission Offset Significant level of 25 tons/year.

**VOC De Minimis Determination**

- (1) Lake County is still classified as a severe nonattainment area for ozone.
- (2) Since this source is located in Lake County, the proposed modification has to be evaluated if it is a minor modification in terms of 326 IAC 2-3 by determining if the VOC emissions increase is de minimis. [326 IAC 2-3-1(z)]
- (3) De minimis means a VOC increase that does not exceed twenty-five (25) tons per year when the net emissions increases from the proposed modification are aggregated with all other net emissions increases from the source over a five (5) consecutive calendar year period prior to, and including, the year of the modification. [326 IAC 2-3-1(q)]
- (4) The following table summarizes the issued approvals during calendar years 1999 to 2004 and their corresponding VOC increases. This information is taken from OAQ's permit database.
- (5) The VOC emissions increases over the previous five (5) calendar years plus the emission increase from the current modification result in emission increases less than the de minimis, therefore this modification is considered a minor modification and not subject to the requirements of 326 IAC 2-3 (Emission Offset). [326 IAC 2-3-2(b)]
- (6) The following table summarizes the issued approvals for US Steel - Gary Works and its contractors from calendar years 1999 to 2004.

Acronyms of Permit Type:

- SSM -- Significant Source Modification
- RR -- Review Request
- MSM -- Minor Source Modification
- E -- Exemption
- SPM -- Significant Source Modification
- AA -- Administrative Amendment

Table 2 - - VOC Net Emissions Increases From 1999 to 2004

Company Name	Permit	Issuance Date	Permit Type	Project	VOC (tons/year)
US Steel Gary Works (089-00121)	19678	10/29/2004	SSM	Temporary Rental Boiler and Coke Plant Boilers	6.51
	18862	05/27/2004	RR	Nos. 5 & 6 ET Lines Fumes/Mist Collector	0
	16365	09/16/2004	RR	CAA 122(j) Applicability Determination	0
	16676	02/11/2003	RR	Experimental Operation in No. 3 Sinter Plant	0
	15694	08/21/2002	MSM	Electrogalvanizing Line Package Boiler upgrade	0.54
	15929	06/20/2002	E	BOP Building Roof monitor Control	0
	15358	03/22/2002	RR	Exp Operation #1 BOP Prototype Fugitive Control	0
	15121	03/14/2002	MSM	Nos. 5 & 7 Batteries Baghouse Replacement	0
	14988	07/19/2002	SPM	160/210-inch Plate Mill Heat Treatment Furnace (natural gas fuel limitation)	0.42
	14950	11/30/2001	AA	Amendment of MSM 14658	0
	14692	12/17/2001	E	Coal Binding/Conveyance Unit	0
14649	08/23/2001	RR	Experimental Operation Blast Furnace No. 6	0	

Table 2 - - VOC Net Emissions Increases From 1999 to 2004

Company Name	Permit	Issuance Date	Permit Type	Project	VOC (tons/year)
US Steel Gary Works (089-00121)	14658	10/02/2001	MSM	Coke Plant Boiler House Lime Storage Baghouse	0
	14424	08/02/2001	MSM	EGL Boiler Modifications	0.072
	12880	07/26/2001	SSM	Nos. 1, 2 and 3 Sinter Strands Modifications and Injections Jets on the Coke Oven Battery	0.75
	11500	08/03/2001	E	Grand Calumet River Sediment Remediation	0
	12137	10/16/2000	MSM	TBBH Boilers Nos. 1, 2, and 3 Modification	0
	11953	04/05/2000	AA	Amendment of MSM 10551	0
	10160	01/13/2000	MSM	BFG Burners of TBBH Boiler No. 6	0.91
	10551	02/10/1999	MSM	Petroleum Coke Crusher	0
American Excavating (089-05250)	18512	03/12/2004	MSM	Portable Stone and Metal Slag Processing Plant	0
Brandenburg Industrial Service Co. (089-00176)	16450	12/31/2003	SSM	Paint Booth	0.12
	19781	(Pending)	SSM		2.051
Heritage Slag Products (089-05210)	14947	04/18/2002	AA	Name Change	0
	14723	08/21/2001	AA	Name Change	0
	14305	06/22/2001	AA	Amendment of SSM 11824	0
	13821	04/23/2001	SSM	Slag Crushing and Screening	0
	11824	06/12/2000	SSM	Slag Crushing & Screening (generator fuel limit)	0.21
Edward C. Levy Co. (089-00133)	14295	06/14/2001	MSM	Parts Washer	0.36
International Mill Service (089-00132)	16366	09/20/2004	RR	CAA 112 (j) Applicability Determination	0
Koppers Inc. (089-00180)	12187	04/19/2002	MSM	Coke Oven Battery Tar Handling/Disposition System	6.56
Oil Technology (089-00171)	10561	01/27/1999	E	Storage Tanks	0
Refractory Materials International (089-00455)	12152	05/25/2000	E	BOP Filter Cake Briquetting	0
<b>Total</b>					<b>18.50</b>
<b>De Minimis Level</b>					<b>25.0</b>

### Permit Level Determination

- (1) Since there is no new unit involved in this modification, the modification is not processed under the procedures of 326 IAC 2-7-10.5 (Source Modification).
- (2) Since the Part 70 Operating Permit for Brandenburg Industrial Service Company has not been finalized,
  - (a) the modification is not processed under the procedures of 326 IAC 2-7-12 (Permit Modification).
  - (b) the existing permit 089-16450-00176, issued on December 31, 2003, is revised pursuant to IC 13-15-7-1 and 326 IAC 2-1.1-2.

### State and Federal Rule Applicability

- (1) There are no changes in the existing federal applicability determinations made to the source.
- (2) There are no changes in the existing state applicability determinations made to the source.
- (3) The existing permit specified that the actual VOC emissions from the booth should be less than 15 pounds per day, such that requirements of 326 IAC 8-2-9 (Miscellaneous Metal Coating) are not applicable. This requirement will be maintained even with the increase in VOC limit allowed for the paint booth.

The VOC limit is 2.5 tons/year, which is less than 2.73 tons/year (equivalent of 15 pounds per day for a year).

### Proposed Permit Changes

Due to the change in the VOC limit for the paint booth, Condition D.1.1 is revised as follows (changes are in **bold** or ~~strikeout~~ fonts to show the difference):

- D.1.1 Emission Offset and PSD Limitations [326 IAC 2-3][326 IAC 2-2]
- (a) The amount of VOC used in the Paint Booth (identified as Unit 002) shall not exceed ~~0.5~~ **2.5** tons per year, with compliance determined at the end of each month.
  - (b) The PM and PM<sub>10</sub> emissions shall be limited as follows:
    - (1) The PM and PM<sub>10</sub> emissions from the Paint Booth (identified as Unit 002) shall not exceed 0.21 pounds per hour. This limit is equivalent to 0.92 tons per year.
    - (2) The PM and PM<sub>10</sub> emissions from the Blast Booth (identified as Unit 003) shall not exceed 0.13 pounds per hour, which is equivalent to 0.57 tons per year.
  - (c) **Pursuant to 326 IAC 2-3-2(b), the VOC emissions increases for the five (5) calendar year period 1999 to 2004 plus the emission increase from the current modification**

**resulted in emission increases less than the de minimis, therefore this modification is considered a minor modification for Emission Offset (326 IAC 2-3) and Nonattainment New Source Review.**

Compliance with conditions (a), (b), **and (c)** makes 326 IAC 2-3 (Emission Offset), **Nonattainment New Source Review**, and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this modification.

#### **Recommendation and Conclusion**

- (1) Based on the facts, conditions and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the [Permit Modification 089-19781-00176](#) be approved.
- (2) The proposed modification is subject to the conditions of the attached proposed [Permit Modification 089-19781-00176](#).
- (3) A copy of the preliminary findings is also available on the Internet at: [www.IN.gov/idem/air/permits/Air-Permits-Online](http://www.IN.gov/idem/air/permits/Air-Permits-Online).

#### **IDEM Contact**

Questions regarding this proposed permit can be directed to Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692 or by e-mail at [icalilun@dem.state.in.us](mailto:icalilun@dem.state.in.us).

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the Technical Support Document (TSD)  
for a Permit Modification  
of a Part 70 Significant Source Modification**

**Source Background and Description**

Source Name:	Brandenburg Industrial Service Company - A contractor of U.S. Steel - Gary Works
Source Location:	One North Broadway TS 670, Gary, Indiana 46402
Mailing Address:	P. O. Box M908, Gary, IN 46401
County:	Lake
SIC Code:	5093 and 1795
Permit Modification No.:	089-19781-00176 of SSM 089-16450-00176, issued on December 31, 2003
Permit Writer:	Iryn Calilung 317/233-5692 icalilun@dem.state.in.us

**Public Notification**

On January 4, 2005, the Office of Air Quality (OAQ) had a notice published in the Post Tribune, Merrillville, Indiana, stating that Brandenburg Industrial Service Company (a contractor of U.S. Steel - Gary Works) had applied for a permit modification to increase the volatile organic compound limit from 0.5 tons per year to 2.5 tons per year for their existing painting operation. The notice also stated that the OAQ proposed to issue a permit for this increase and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The public comment period ended on February 3, 2005.

### Proposed Permit Changes After Public Notice

Upon further review, the Office of Air Quality (OAQ) has decided to make the following revisions to the draft permit (changes are in **bold** or ~~strikeout~~ fonts to show the difference):

- (1) The 8-hour ozone nonattainment designations in 69 FR 23858 have been incorporated in 326 IAC 1-4-1 effective December 12, 2004. Therefore, the OAQ has deleted the Nonattainment New Source Review term from the permit.

#### D.1.1 Emission Offset and PSD Limitations ~~[326 IAC 2-3]~~[326 IAC 2-2]

- (a) The amount of VOC used in the Paint Booth (identified as Unit 002) shall not exceed 2.5 tons per year, with compliance determined at the end of each month.
- (b) The PM and PM<sub>10</sub> emissions shall be limited as follows:
  - (1) The PM and PM<sub>10</sub> emissions from the Paint Booth (identified as Unit 002) shall not exceed 0.21 pounds per hour. This limit is equivalent to 0.92 tons per year.
  - (2) The PM and PM<sub>10</sub> emissions from the Blast Booth (identified as Unit 003) shall not exceed 0.13 pounds per hour, which is equivalent to 0.57 tons per year.
- (c) Pursuant to 326 IAC 2-3-2(b), the VOC emissions increases for the five (5) calendar year period 1999 to 2004 plus the emission increase from the current modification resulted in emission increases less than the de minimis, therefore this modification is considered a minor modification for Emission Offset (326 IAC 2-3) **and Nonattainment New Source Review**.

Compliance with conditions (a), (b), **and (c)** makes 326 IAC 2-3 (Emission Offset), ~~Nonattainment New Source Review~~, and 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable to this modification.

- (2) The address of the department indicated in the permit, where applicable, has been updated by removing the P. O. Box number.

### IDEM Contact

Questions regarding this permit can be directed to Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692 or by e-mail at icalilun@dem.state.in.us.

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).