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

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 12, 2005

Mr. Daniel Moore
Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, IN 46404

Re: **089-20238-00161**
Second Significant Revision to
FESOP 089-5330-00161

Dear Mr. Moore:

Industrial Steel Construction, Inc. was issued a permit on July 5, 2000 for a metal working and bridge beam fabrication source. A letter requesting changes to this permit was received on October 4, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1, a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

The revision consists of removing an insignificant activity from the permit and revising limits for some existing facilities. As a result of the changes, there is no change in the potential to emit of the source, and the source is still a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration, and 326 IAC 2-3, Emission Offset.

The following conditions are applicable to the revision:

1. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

2. All requirements and conditions of this approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

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 CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

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

Attachments
CAP/MES
cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Gary Department of Environmental Affairs
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Branch
Administrative and Development Section
Technical Support and Modeling - Michele Boner

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY and Gary Department of Environmental Affairs

Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, Indiana 46404

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 089-5330-00161	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 5, 2000 Expiration Date: July 5, 2005

First Reopening No.: R 089-13068-00161, issued September 24, 2001
First Significant Permit Revision: 089-14370-00161, issued on January 10, 2002

Second Significant Permit Revision: 089-20238-00161	Conditions Affected: A.1 A.2, A.3, B.23, Facility Description Boxes in D.1 and D.4, D.1.1, D.1.3, D.1.15, D.4.1, D.4.7 (now D.4.5), and all Report Forms; Conditions D.4.4, D.4.5 have been removed and the remainder of Section D.4 has been renumbered accordingly; The local agency name and address has been updated
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 12, 2005

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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 Quality (OAQ) and Gary Department of Environmental Affairs. 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 miscellaneous metal working and bridge beam fabrication source.

Authorized individual:	Daniel Moore
Source Address:	86 North Bridge Street, Gary, Indiana 46404
Mailing Address:	86 North Bridge Street, Gary, Indiana 46404
Phone Number:	219 - 885 - 7600
SIC Code:	3441 and 3449
County Location:	Lake County
Source Location Status:	Severe Nonattainment for Ozone based on the 1-hour standard Moderate Nonattainment for Ozone based on the 8-hour standard Attainment for CO Primary Nonattainment for SOx Attainment for Lead Attainment for PM_{10}
Source Status:	Federally Enforceable State Operating Program (FESOP) Minor Source, Under Emission Offset Rules: Section 112 of the Clean Air Act

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

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

#1 Blaster Conveyor Line

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

(b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

(c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 16.5 tons of VOC delivered to the applicators per year and limited to less

than 9,435 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.

(e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.

(f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.

(g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

(h) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 18,000 square feet of steel plates per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 72,002 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month.

Paint Line

(j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.

(k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

(1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.

(2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.

(3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.

(4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.

(5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.

(6) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.

(7) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) A gasoline fuel 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.

(d) 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.

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) open parts washers, identified as EU #12.

(i) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38EC (100EF) or;

(2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) On-site fire and emergency response training approved by the department.

(r) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

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

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

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

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

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

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

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

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

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

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

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by Gary Department of Environmental Affairs.

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, and Gary Department of Environmental Affairs within a reasonable time, any information that IDEM, OAQ, and Gary Department of Environmental Affairs 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. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Upon request, the Permittee shall also furnish to IDEM, OAQ, and Gary Department of Environmental Affairs, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, then the Permittee must furnish record directly to the U. S. EPA. The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

IDEM, OAQ and Gary Department of Environmental Affairs 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 Section 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(1)]

(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 an authorized individual 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, on the attached Certification Form, with each submittal.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

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

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

(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, and Gary Department of Environmental Affairs on or before the date it is due.

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and Gary Department of Environmental Affairs may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after 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 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Gary Department of Environmental Affairs upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Gary Department of Environmental Affairs. IDEM, OAQ, and Gary Department of Environmental Affairs may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Gary Department of Environmental Affairs, 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

Gary Department of Environmental Affairs
Local Agency Telephone No.: 219-882-3007
Local Agency Facsimile No.: 219-882-3012

Failure to notify IDEM, OAQ and Gary Department of Environmental Affairs, 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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

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

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ and Gary Department of Environmental Affairs, 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 and Gary Department of Environmental Affairs, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

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

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

within ten (10) calendar days from the date of the discovery of the deviation. The failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

(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 such failure has caused or contributed to a deviation.

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. The notification does not need to be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(c)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or Gary Department of Environmental Affairs 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 or Gary Department of Environmental Affairs, 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 and Gary Department of Environmental Affairs, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ and Gary Department of Environmental Affairs, 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 Gary Department of Environmental Affairs, 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). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

(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, and Gary Department of Environmental Affairs when applicable) on or before the date it is due.

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

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and Gary Department of Environmental Affairs 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 and Gary Department of Environmental Affairs, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1) 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 Operational Flexibility [326 IAC 2-8-15]

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 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

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

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 and Gary Department of Environmental Affairs, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(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 conditions:

(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 “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the applicable provisions of 326 IAC 2-8-11.1.

B.21 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, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and Gary Department of Environmental Affairs U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application 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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

The application which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and Gary Department of Environmental Affairs, 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 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);

(2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;

(3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.

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

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (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.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. 326 IAC 9-1-2 is not federally enforceable.

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]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

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

Except as otherwise provided 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.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 Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable 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 applicable 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) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing 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 permit, shall be submitted 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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Gary Department of Environmental Affairs within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and Gary Department of Environmental Affairs, 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.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D 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 measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

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

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

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

(a) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(c) A verification to IDEM, OAQ, and Gary Department of Environmental Affairs that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(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. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

(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 and Gary Department of Environmental Affairs upon request and shall be subject to review and approval by IDEM, OAQ, and Gary Department of Environmental Affairs. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.

(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment. 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 or is returning 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.

(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.

(f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.

(1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.

(2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.17 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 excess emissions from the affected facility while the corrective 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 documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements 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). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The annual emission statement 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, and Gary Department of Environmental Affairs on or before the date it is due.

C.19 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Gary Department of Environmental Affairs makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Gary Department of Environmental Affairs 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.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(c)] [326 IAC 2-1.1-11]

(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. The Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

and

Gary Department of Environmental Affairs
839 Broadway
Gary, Indiana 46402

(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, and Gary Department of Environmental Affairs on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 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

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

#1 Blaster Conveyor Line

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

(b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

(c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 16.5 tons of VOC delivered to the applicators per year and limited to less than 9,435 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, with compliance determined at the end of each month.

(d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.

(e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.

(f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.

(g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

(h) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 18,000 square feet of steel plates per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 72,002 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month.

(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 2-8-4(1)]

D.1.1 PSD, Emission Offset and FESOP Minor Limit [326 IAC 2-3] [326 IAC 2-2] [326 IAC 2-8]

(a) The one (1) paint booth, identified as EU #15, shall:

(1) Use less than 16.5 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7 (Part 70) not applicable.

(2) Use less than 9,435 gallons of paint with a density 21.3 pounds per gallon and a solids content no greater than 84%, per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(b) The input of steel plates and shapes to the mechanical blaster, identified as EU #1 shall be limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(c) The input of steel plates and shapes to the mechanical blaster, identified as EU #2 shall be limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(d) The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(e) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to 18,000 square feet of steel plates per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(f) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to 72,002 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(g) The throughput of steel to the forty-seven (47) torches, (excluding the two (2) DB torches) identified as EU #13, shall be limited to a total of 34,601,227 inches of one (1) inch steel cut

per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

(h) The input of wire to the twelve (12) submerged arc welding heads, identified as EU #17 shall be limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-1]

(a) The particulate matter (PM) emissions from each of the three (3) blasters, identified as EU #1, EU #2 and EU #18, shall not exceed 0.03 grains per dry standard cubic foot for Stacks #1, #2 and #18, equivalent to:

(1) 5.74 pounds per hour at a flow rate of 22,330 dry standard cubic feet per minute for EU #1,

(2) 1.57 pounds per hour at a flow rate of 6,100 dry standard cubic feet per minute for EU #2, and

(3) 6.43 pounds per hour at a flow rate of 25,000 dry standard cubic feet per minute for EU #18.

(b) The particulate matter (PM) emissions from EU #9, EU #11, EU13 and EU #17, shall not exceed 0.03 grains per dry standard cubic foot. Those facilities which do not have stacks or vents and are not totally enclosed shall comply with 326 IAC 5-1 and 326 IAC 6-4 in lieu of 0.03 grains per dry standard cubic foot requirement of 326 IAC 6-1-2(a).

D.1.3 PM_{10} [326 IAC 2-8-4] [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-8-4, the individual emissions units shall not exceed the following hourly PM_{10} emission limits and PM_{10} emission factors:

Process	**Hourly PM_{10} Emission Limit** (pounds per hour)
EU #1, Blaster #1	5.74
EU #2, Blaster #2	1.57
EU #18, Blaster #3	3.21

Process	**PM_{10} Emission Factor** (pounds of PM_{10} per 1,000 pounds of rods consumed)
EU #9, 12 Stick Welders	18.4

Process	PM_{10} Emission Factor (pounds of PM_{10} per square foot of plate swept)
EU #11, 2 Sweep Grinders	0.0925

Process	PM_{10} Emission Factor (pounds of PM_{10} per pound of slab ground)
EU #11, 2 Slab Grinders	0.000493

Process	PM_{10} Emission Factor (pounds of PM_{10} per 1,000 inches of one (1) inch thick steel cut)
EU #13, 49 Cutting Torches	0.0815

Process	PM_{10} Emission Factors (pounds of PM_{10} per pound of wire consumed)
EU #17, 12 Submerged Arc Welders	0.036

(b) Compliance with these PM_{10} emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and 326 IAC 2-2 do not apply.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #15 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):

$$\frac{\sum_{c=1}^{c=n} \text{coating c (gal)} \times \text{VOC content of c (lbs/gal, less water)}}{\sum_{c=1}^{c=n} \text{coating c (gal)}}$$

(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #15 and EU #17 and any control devices.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform PM and PM_{10} testing of EU #1, #2 and #18 (blasters #1, #2 and #3) utilizing Methods 5 or 17 (40 CFR 60, Appendix A) for PM and Methods 201 or 201A and 202 (40 CFR 51, Appendix M) for PM_{10}, or other methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1(a) and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and Gary Department of Environmental Affairs reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.1(a) shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.1.9 Particulate Matter (PM)

(a) The baghouses for PM control shall be in operation and control emissions from the EU #1, EU #2 and EU #18 (blasters #1, #2 and #3) at all times that the blasting processes are in operation.

(b) The smoke eliminators associated with the two (2) DB torches in EU #13 shall be in operation at all times that the DB torches are in operation.

D.1.10 Visible Emissions Notations

(a) Daily visible emission notations of the blaster stack exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) Daily visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.11 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the blasting processes, at least once per shift when the blasting processes are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouses for blasters #1 and #2 shall be maintained within the range of 2.0 and 6.0 inches of water and within the range of 1.0 and 4.0 inches of water for blaster #3 or a range established during the latest stack tests. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when the pressure readings are outside of the above mentioned ranges for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and Gary Division Air Pollution Control and shall be calibrated at least once every six (6) months.

D.1.12 Monitoring of Smoke Eliminators

Daily inspections shall be performed to verify the placement and integrity of the smoke eliminators associated with the two (2) DB torches in EU #13. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.1.13 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the blasting operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.14 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.1.15 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a) and D.1.4, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily or monthly, as specified, and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.1.1(a) and D.1.4.

(1) The amount, density, and VOC and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day, if necessary;

(4) The cleanup solvent usage for month;

(5) The total VOC usage for each month;

(6) The weight of VOCs emitted for each compliance period; and

(7) The total amount of coatings used.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the three (3) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:

(1) Records of the following operational parameters once per shift during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) through D.1.1(i) shall be submitted to the addresses 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 not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Paint Booth, known as EU#20

(j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.

(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 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC)Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of miscellaneous metal parts or products may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to HVLP paint applicators.

(b) Based upon 326 IAC 8-1-2(c) and a minimum overall control efficiency of 69.1% (the overall control efficiency equals: (capture efficiency) x (destruction efficiency)), the VOC content of the coating shall not exceed 21.6 pounds per gallon of coating solids delivered to the applicator.

(c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.2 Emission Offset Minor Limit [326 IAC 2-3]

(a) The coatings used in the one (1) paint booth, identified as EU #20, shall not exceed 17,170 gallons of primer delivered to the applicators with a VOC content of no more than 21.6 pounds per gallon of solids per twelve (12) consecutive month period, rolled monthly.

(b) The solvents used in the one (1) paint booth, identified as EU #20, shall not exceed 876 gallons of solvent with a VOC content of no more than 6.93 pounds per gallon per twelve (12) consecutive month period, rolled monthly.

(c) Compliance with these limits, equivalent to 3.86 tons of VOC per year, makes the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.2.3 Regenerative Thermal Oxidizer

(a) The regenerative thermal oxidizer shall operate at all times that the process is in operation. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1400EF during operation until a temperature and fan amperage has been determined from the most recent compliant stack test, as approved by IDEM.

(b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-2-9, 3.5 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum overall control efficiency of 69.1%. These efficiencies and the use of the thermal oxidizer are required by rule 326 IAC 8-1-2(a)(2).

D.2.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

During the period between 60 and 180 days after the paint booth, EU #20, is in operation, the Permittee shall perform VOC testing to demonstrate compliance with Condition D.2.1 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of this valid compliance demonstration.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Parametric Monitoring

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the regenerative thermal oxidizer for measuring operating temperature. The output of this system shall be recorded, and that temperature shall be greater than or equal to the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) The duct pressure or fan amperage shall be observed at least once per week when the thermal oxidizer is in operation. This pressure or amperage shall be maintained within the range established in the most recent compliant stack test.

(c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the reading is outside the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.2.8 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, D.2.3 and D.2.7, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2 and D.2.3 as well as the parametric monitoring requirements of Condition D.2.7.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(6) The continuous temperature records for the regenerative thermal oxidizer and the temperature used to demonstrate compliance during the most recent compliance stack test.

(7) Weekly records of the duct pressure or fan amperage.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the addresses 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 not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Blaster/blowoff, known as EU#19

(k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

(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 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]
Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the mechanical blaster/blowoff, known as EU#19, shall not exceed 0.03 grain per dry standard cubic foot for Stack #9, equivalent to 5.66 pounds per hour at a flow rate of 22,000 dry standard cubic feet per minute.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]
A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)
In order to comply with Condition D.3.1, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster/blowoff, known as EU#19, at all times that the mechanical blaster/blowoff is in operation.

D.3.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]
During the period between 60 and 180 days after the mechanical blaster/blowoff is in operation, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM_{10} testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.3.5 Visible Emissions Notations

(a) Visible emission notations of the mechanical blaster/blowoff stack exhaust #9 shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per shift when the mechanical blaster/ blowoff process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 4.0 and 8.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

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

D.3.7 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the mechanical blaster/blowoff operation when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three (3) months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.3.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

D.3.9 Record Keeping Requirements

(a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations once per shift of the mechanical blaster/blowoff stack exhaust #9.

(b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.7, the Permittee shall maintain records of the results of the inspections required under Condition D.3.7 and the dates the vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: - **Insignificant Activities**

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Four (4) open parts washers, identified as EU #12.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(l) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables.

(r) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

(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 2-8-4(1)]

D.4.1 Emission Offset Minor Limit [326 IAC 2-3]

The VOC used by the four (4) open parts washers, identified as EU #12, shall be less than a total of 3.00 tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

(a) Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the brazing equipment, cutting torches soldering equipment, welding equipment structural steel and bridge fabrication activities and hand grinding shall be limited to 0.03 grain per dry standard cubic foot.

(b) Pursuant to 326 IAC 6-1-2(b)(5), the particulate matter emission from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air. This emission limit also satisfies the requirements of 326 IAC 6-2-2.

D.4.3 Organic Solvent Degreasing Operations: Open top vapor degreaser operation [326 IAC 8-3-3]

The four (4) open parts washers, identified as EU #12, are subject to this rule. The owner or operator of open top vapor degreasers shall:

(a) equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone;

(b) keep the cover closed at all times except when processing work loads through the degreaser;

(c) minimize solvent carryout by:

(1) racking parts to allow complete drainage;

(2) moving parts in and out of the degreaser at less than 3.3 meters per minute (eleven (11) feet per minute);

(3) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;

(4) tipping out any pools of solvent on the cleaned parts before removal; and

(5) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry;

(d) not degrease porous or absorbent materials, such as cloth, leather, wood or rope;

(e) not occupy more than half of the degreaser's open top area with the workload;

(f) not load the degreaser such that the vapor level drops more than fifty percent (50%) of the vapor depth when the workload is removed;

(g) never spray above the vapor level;

(h) repair solvent leaks immediately, or shut down the degreaser;

(i) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, such that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere;

(j) not use workplace fans near the degreaser opening;

(k) not allow visually detectable water in the solvent exiting the water separator; and

(l) provide a permanent, conspicuous label summarizing the operating requirements.

Compliance Determination Requirements

D.4.4 VOC Emissions

Compliance with Condition D.4.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

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

D.4.5 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content

limits established in Condition D.4.1.

(1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses 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 not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

and Gary Department of Environmental Affairs

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161

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) _____

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 BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

and Gary Department of Environmental Affairs

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

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161

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

Check either No. 1 or No.2

9 1. This is an emergency as defined in 326 IAC 2-7-1(12)
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
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

9 2. This is a deviation, reportable per 326 IAC 2-8-4(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:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_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 QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than 16.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: Gallons of paint with a density no more than 21.3 pounds per gallon and solids content of no more than 84%
Limit: Less than 9,435 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Gallons of Paint This Month	Gallons of Paint Previous 11 Months	Gallons of Paint 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Mechanical blasters #1 and #2, EU #1 and EU #2
Parameter: Input of steel plates and shapes
Limits: 1,253,916 linear feet per twelve (12) consecutive month period, rolled monthly for EU #1.
2,102,400 linear feet per twelve (12) consecutive month period, rolled monthly for EU #2.

YEAR: _____

Month	EU #1 Linear Feet	EU #2 Linear Feet	EU #1 Linear Feet	EU #2 Linear Feet	EU #1 Linear Feet	EU #2 Linear Feet
	This Month	This Month	Previous 11 Months	Previous 11 Months	12 Month Total	12 Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Twelve (12) electric arc stick welders, EU #9
Parameter: Rods
Limit: Fifty (50) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Rods (tons) This Month	Rods (tons) Previous 11 Months	Rods (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Twelve (12) submerged arc welding heads, EU #17
Parameter: Wire
Limit: One hundred and thirty (130) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Wire (tons) This Month	Wire (tons) Previous 11 Months	Wire (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Two (2) plate sweep grinders, EU #11
Parameter: Area of steel plates swept
Limit: 18,000 square feet of steel plates swept per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Steel Plates Swept (tons) This Month	Steel Plates Swept (tons) Previous 11 Months	Steel Plates Swept (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Two (2) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: 72,002 tons of steel slabs ground per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #20
Parameter: Paint and Solvent Usage
Limit: Not to exceed 17,170 gallons of paint and 876 gallons of solvent per twelve (12) consecutive month period, rolled monthly.

YEAR:

Month	Paint Gallons	Solvent Gallons	Paint Gallons	Solvent Gallons	Paint Gallons	Solvent Gallons
	This Month		Previous 11 Months		12 Month Total	

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Forty-seven (47) torches (excluding the two (2) DB torches), EU #13
Parameter: Inches of one (1) inch steel cut
Limit: 34,601,227 inches total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Inches of one (1) inch steel cut	Inches of one (1) inch steel cut	Inches of one (1) inch steel cut
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161
Facility: Four (4) parts washers, EU #12
Parameter: VOC usage
Limit: Less than 3.00 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and Gary Department of Environmental Affairs

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

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
FESOP No.: F 089-5330-00161

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 based on a calendar year. 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 (eg. Permit Condition D.1.3)	**Number of Deviation**	**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
and Gary Department of Environmental Affairs

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, Indiana 46404
County:	Lake
SIC Code:	3441
Operation Permit No.:	F 089-5330-00161
Operation Permit Issuance Date:	July 5, 2000
Significant Permit Revision No.:	SPR 089-20238-00161
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Industrial Steel Construction, Inc. relating to the following:

(a) Industrial Steel Construction, Inc. has removed the following insignificant activity:

Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.

(b) Industrial Steel Construction, Inc. is requesting revisions to the throughput limits on the two (2) plate sweep grinders, identified as EU #11, and the two (2) slab grinders, identified as EU #11, to decrease the potential to emit PM and PM_{10} from EU #11 from 40.0 tons per year to 36.3 tons per year.

(c) As a result of the changes above, the applicant is requesting to revise the paint usage limit and the VOC usage limit at the one (1) paint booth, identified as EU #15. This will increase the potential to emit VOC, PM and PM_{10} from that facility, while remaining a minor source pursuant to 326 IAC 2-3, Emission Offset, and 326 IAC 2-2, Prevention of Significant Deterioration. The potential to emit VOC from that facility will increase from 15 to 16.5 tons per year and the potential to emit PM and PM_{10} will increase from 17.4 to 21.1 tons per year. However, due to the removal of paint booth EU #10 and the changes in the limitations for EU #11 (see (a) and (b) above), there is no change in the total potential to emit of the source as a result of this change.

History

On October 4, 2004, Industrial Steel Construction, Inc. submitted an application to the OAQ requesting to remove an insignificant activity and revise individual limits at their existing plant. These changes will not result in an increase in emissions from the source. Industrial Steel Construction, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) (F 089-5330-00161) on July 5, 2000. A first Reopening (R 089-13068-00161) was issued on September 24, 2001, and a first Significant Permit Revision (089-14370-00161) was issued on January 10, 2002.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 4, 2004.

Justification for Revision

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f), because, as stated in 326 IAC 2-8-11.1(g), a significant revision is required for adjustments to limitations and any modifications that change existing requirements for units or processes under an emissions cap.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Nonattainment
NO_2	Attainment
1-Hour Ozone	Severe nonattainment
8-Hour Ozone	Moderate nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_X threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(2) VOC and NO_X emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) This source is in a portion of Lake County that has been classified as nonattainment in Indiana for SO_2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) Lake County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	**Emissions** (tons/year)
PM	< 99.4
PM_{10}	< 100
SO_2	0.058
VOC	< 25
CO	8.05
NO_X	9.58

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two-hundred fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more, and no severe nonattainment pollutant is emitted at rate of twenty-five (25) tons per year or more.

(b) These emissions are based upon the "Revised Potential to Emit of Existing Source Plus Proposed Revision After Issuance" table in the Technical Support Document for the first Significant Permit Revision, 089-14370-00161, issued on January 10, 2002.

Revised Potential to Emit

The following table was abstracted from the Technical Support Document for the first Significant Permit Revision, 089-14370-00161, issued on January 10, 2002, and shows the revisions in the potential to emit of the existing emission units, using bold for additions and strikeouts for deletions.

	Limited Potential to Emit (tons/year)						
Emission Unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
EU #1	5.00	5.00	0.00	0.00	0.00	0.00	0.00
EU #2	3.44	3.44	0.00	0.00	0.00	0.00	0.00
EU #9	0.920	0.920	0.00	0.00	0.00	0.00	0.00
EU #11	~~40.0~~ **36.3**	~~40.0~~ **36.3**	0.00	0.00	0.00	0.00	0.00
EU #13	2.01	2.01	0.00	0.00	0.00	0.00	single<10 total < 25
EU #15	~~less than 17.4~~ **21.1**	~~less than 17.4~~ **21.1**	0.00	~~less than 15.0~~ **16.5**	0.00	0.00	single<10 total < 25
EU #17	4.68	4.68	0.00	0.00	0.00	0.00	single<10 total < 25
EU #18	14.1	14.1	0.00	0.00	0.00	0.00	0.00
EU #19	5.70	5.70	0.00	0.00	0.00	0.00	0.00
EU #20	2.66	2.66	0.00	3.86	0.00	0.00	0.893
Insignificant Activities (Natural Gas Combustion)	0.046	0.182	0.014	0.132	2.02	2.40	0.045
EU #7 (Insignificant Activity)	0.014	0.057	0.005	0.041	0.631	0.751	single<10 total < 25
EU #8 (Insignificant Activity)	0.113	0.450	0.036	0.326	4.98	5.92	single<10 total < 25
~~EU #10 (Insignificant Activity)~~	~~0.00~~	~~0.00~~	~~0.00~~	~~1.50~~	~~0.00~~	~~0.00~~	~~0.00~~
EU #12 (Insignificant Activity)	0.00	0.00	0.00	Less than 3.00	0.00	0.00	single<10 total < 25
EU #14 (Insignificant Activity)	0.010	0.038	0.003	0.028	0.420	0.501	single<10 total < 25
Other Insignificant Activities	3.34	3.34	0.00	1.00	0.00	0.00	single<10 total < 25
Total Emissions	~~less than~~ 99.4	less than 100	0.058	less than 25	8.05	9.58	single<10 total < 25

(a) The limited VOC delivered to the applicators, including those from coatings, dilution solvents, and cleaning solvents, from the one (1) paint booth, identified as EU #15, have been revised from less than 15 tons per twelve (12) consecutive month period, to less than 16.5 tons per twelve (12) consecutive month period.

(b) The limited coating usage at EU #15 has been revised from less than 7,801 gallons of paint

to 9,435 gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, equivalent to PM and PM_{10} emissions of 21.1 tons per year, based on a solids content of 84% and a transfer efficiency of 75%.

(c) The limited PM and PM_{10} emissions from EU #11 have been reduced such that the total PM and PM_{10} emissions from that unit are limited to 36.3 tons per year. As requested by the applicant, the Condition D.1.1(e) and (f) will be revised so that the limitations are revised as follows:

(1) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to ~~136,817~~ **18,000** square feet of steel plates per twelve (12) consecutive month period, equivalent to ~~6.32~~ **0.833** tons per year.

(2) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to ~~68,281~~ **72,002** tons of steel slabs per twelve (12) consecutive month period, equivalent to ~~33.6~~ **35.5** tons per year.

These emissions are calculated based upon the PM_{10} emission limitation in Condition D.1.3 of the permit. In that condition, the potential to emit PM_{10} from the slab grinders is limited to 0.000493 pounds per pound of steel slabs, and the potential to emit PM_{10} from the plate sweep grinders is limited to 18.4 pounds per square foot of plates swept. However, that appears to be a typographical error. The limitation for the plate sweep grinders should be the emission factor of 0.0925 pound per square foot, which was the basis for the previous production limitations. That has been corrected in the permit. The PM and PM_{10} emissions from those units are equal.

Federal Rule Applicability

The revised limitations will not change the applicability of any Federal Rules.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (PSD)

In order to comply with 326 IAC 2-8, the potential to emit PM_{10} is still limited to less than 100 tons per year. The potential to emit PM is also limited to 99.4 tons per year. As a result of these limitations, this source will remain a minor source pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. Note that Lake County has been redesignated to attainment for PM_{10}.

326 IAC 2-3 (Emission Offset)

In order to comply with 326 IAC 2-8, potential to emit VOC is still limited to less than 25 tons per year. Therefore, this source is still a minor source pursuant to 326 IAC 2-3, Emission Offset.

326 IAC 2-8 (FESOP)

As a result of the revised PM_{10} and VOC limitations on some facilities, the potential to emit PM_{10} is still limited to less than 100 tons per year, and the potential to emit VOC is still limited to less than 25 tons per year. Therefore, this source still qualifies for a FESOP pursuant to 326 IAC 2-8.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

The requirements of 326 IAC 6-1 are already applicable to the facilities at this source, and will remain applicable. The changes in production limitations will not affect the Permittee's ability to comply with

this rule.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The requirements of 326 IAC 8-2-9 are already applicable to the one (1) paint booth, identified as EU #15, installed in 1977. 326 IAC 8-2-9 will remain applicable to that facility. The one (1) insignificant paint booth, identified as EU #10, has been removed from this source. Therefore, the requirements of 326 IAC 8-2-9 have been removed from Section D.4 of the permit.

Compliance Requirements

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

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

There are no changes to the compliance monitoring requirements applicable to this source as a result of this revision.

Testing Requirements

Since the revisions to the emissions limitation are the result of changes in the limitations on production and material usage, there are no additional testing requirements as a result of this change.

Proposed Changes

Some conditions in Section D.4 have been removed. Therefore, Section D.4 has been renumbered accordingly. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

The local agency in Gary, Indiana has changed its name from "Gary Air and Land Pollution Control" to "Gary Department of Environmental Affairs." All references to the local agency have been revised in the permit. In addition, the street address of the local agency has been changed from "504 Broadway" to "504 N. Broadway." Therefore, the address of the local agency has also been revised in the permit. In addition, the zip code of the source has been corrected on all report forms to 46404.

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

The Permittee owns and operates a miscellaneous metal working and bridge beam fabrication source.

Authorized individual:	Daniel Moore
Source Address:	86 North Bridge Street, Gary, Indiana 46404
Mailing Address:	86 North Bridge Street, Gary, Indiana 46404

Phone Number:	219 - 885 - 7600
SIC Code:	3441 and 3449
County Location:	Lake County
Source Location Status:	~~Severe Nonattainment for NO_x~~ Severe Nonattainment for ~~VOC~~ **Ozone based on the 1-hour standard** **Moderate Nonattainment for Ozone based on the 8-hour standard** Attainment for CO Primary Nonattainment **for** SOx ~~Primary Nonattainment TSP~~ **Attainment for Lead** ~~Moderate Nonattainment~~ **Attainment for** PM_{10}
Source Status:	Federally Enforceable State Operating Program (FESOP) Minor Source, Under Emission Offset Rules: Section 112 of the Clean Air Act

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

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

#1 Blaster Conveyor Line

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

(b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

(c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than ~~15~~ **16.5** tons of VOC delivered to the applicators per year and limited to less than ~~7,801~~ **9,435** gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

(d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.

(e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.

(f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.

(g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

(h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to ~~136,817~~ **18,000** square feet of steel plates per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

(i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to ~~68,281~~ **72,002** tons of steel slabs per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

Paint Line

(j) One (1) paint booth, known as EU#20, equipped with HVLP applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, known as RTO 100, rated at 1.5 million British thermal units per hour, to be installed in 2001, exhausted through Stack #10, capacity: 43,269 pounds of steel plate per hour, limited to 17,170 gallons of paint and 876 gallons of solvents per twelve (12) consecutive month period, rolled monthly.

(k) One (1) mechanical blaster/blowoff, known as EU#19, equipped with a baghouse, exhausting through Stack #9, to be installed in 2001, capacity: 52,409 pounds of steel plate per hour.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

(1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.

(2) Twenty-one (21) space heaters, identified as EU #8, rated at 2.1 million British thermal units per hour total.

(3) Twelve (12) down-flow heaters, identified as EU #8, rated at 0.600 million British thermal units per hour each or 7.2 million British thermal units per hour total.

(4) Twenty-eight (28) radiant heaters, identified as EU #8, rated at 0.175 million British thermal units per hour each or 4.9 million British thermal units per hour total.

(5) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.

(6) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.

(7) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.

(b) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(c) A gasoline fuel 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.

(d) 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.

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual through-puts less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) open parts washers, identified as EU #12.

(i) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(k) Closed loop heating and cooling systems.

(l) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(n) Paved and unpaved roads and parking lots with public access.

(o) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(p) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(q) On-site fire and emergency response training approved by the department.

(r) ~~Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.~~

~~(s)~~ Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, and ~~Gary Air and Land Pollution Control~~ **Gary Department of Environmental Affairs**, 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~~ **4230** (ask for OAQ, ~~Technical Support and Modeling~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

#1 Blaster Conveyor Line

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn), with a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour, limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Building A Line

(b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: 18.75 discrete steel plates and shapes per hour (150 pieces per turn) with a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour, limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly.

Girder Shop

(c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than ~~15~~ **16.5** tons of VOC delivered to the applicators per year and limited to less than ~~7,801~~ **9,435** gallons of paint with a density 21.3 pounds per gallon per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

(d) Twelve (12) electric arc stick welders, identified as EU #9, capacity: 0.5 rods per minute, limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly.

(e) Oxy Methane Cutting, including forty (40) torches consisting of Linde 100 Gantry Units #1 - #4, #350, #B5, Tysamin Unit #T1, X88 Burning Bugs #1 - #3, MG Unit MG1, seven (7) torches consisting of bug burning units #4 - #10 and two (2) DB torches consisting of bug mounted #1 and #2, equipped with smoke eliminators, collectively identified as EU #13, total of forty-nine (49) torches operational, the forty-seven (47) torches, (excluding the two (2) DB torches) are limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly.

(f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse for particulate matter control, exhausting through Stack #18, capacity: 0.125 girders per hour (4 girders per turn) with a maximum media throughput of 430,440 pounds per hour or 37.5 linear feet per hour.

(g) Twelve (12) submerged arc welding heads, identified as EU #17, capacity: 18.25 tons of wire per month total or 219 tons of wire per year, limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly.

Grinding

(h) Two (2) plate sweep grinders, identified as EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to ~~136,817~~ **18,000** square feet of steel plates per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

(i) Two (2) slab grinders, identified as EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to ~~68,281~~ **72,002** tons of steel slabs per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

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

D.1.1 **PSD,** Emission Offset **and FESOP** Minor Limit [326 IAC 2-3] **[326 IAC 2-2] [326 IAC 2-8]**

(a) The one (1) paint booth, identified as EU #15, shall:

(1) Use less than ~~fifteen (15)~~ **16.5** tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) **tons** per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) **and 326 IAC 2-7 (Part 70)** not applicable.

(2) Use less than ~~7,801~~ **9,435** gallons of paint with a density 21.3 pounds per gallon **and a solids content no greater than 84%,** per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(b) The input of steel plates and shapes to the mechanical blaster, identified as EU #1 shall be limited to 1,253,916 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(c) The input of steel plates and shapes to the mechanical blaster, identified as EU #2 shall be limited to 2,102,400 linear feet of steel plates and shapes per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(d) The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)**not applicable.

(e) The input of steel plates to the two (2) plate sweep grinders, identified as EU #11, shall be limited to ~~136,817~~ **18,000** square feet of steel plates per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(f) The input of steel slabs to the two (2) slab grinders, identified as EU #11, shall be limited to ~~68,281~~ **72,002** tons of steel slabs per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(g) The throughput of steel to the forty-seven (47) torches, (excluding the two (2) DB torches) identified as EU #13, shall be limited to a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

(h) The input of wire to the twelve (12) submerged arc welding heads, identified as EU #17 shall be limited to 130 tons of wire per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes ~~326 IAC 2-3 (Emission Offset)~~ **326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70)** not applicable.

D.1.3 PM_{10} [326 IAC 2-8-4] ~~[326 IAC 2-3]~~ **[326 IAC 2-2]**

(a) Pursuant to 326 IAC 2-8-4, the individual emissions units shall not exceed the following hourly PM_{10} emission limits and PM_{10} emission factors:

Process	**Hourly PM_{10} Emission Limit** (pounds per hour)
EU #1, Blaster #1	5.74
EU #2, Blaster #2	1.57
EU #18, Blaster #3	3.21

Process	**PM_{10} Emission Factor** (pounds of PM_{10} per 1,000 pounds of rods consumed)
EU #9, 12 Stick Welders	18.4

Process	**PM_{10} Emission Factor** (pounds of PM_{10} per square foot of plate swept)
EU #11, 2 Sweep Grinders	~~18.4~~ **0.0925**

Process	**PM_{10} Emission Factor** (pounds of PM_{10} per pound of slab ground)
EU #11, 2 Slab Grinders	0.000493

Process	**PM_{10} Emission Factor** (pounds of PM_{10} per 1,000 inches of one (1) inch thick steel cut)
EU #13, 49 Cutting Torches	0.0815

Process	**PM_{10} Emission Factors** (pounds of PM_{10} per pound of wire consumed)
EU #17, 12 Submerged Arc Welders	0.036

(b) Compliance with these PM_{10} emission limits will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) and ~~326 IAC 2-3~~ **326 IAC 2-2** do not apply.

D.1.15 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a) and D.1.4, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(7)** below. Records maintained for (1) through ~~(6)~~ **(7)** shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.1.1(a) and D.1.4.

(1) The amount**, density,** and VOC **and solids** content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day, if necessary;

(4) The cleanup solvent usage for month;

(5) The total VOC usage for each month; ~~and~~

(6) The weight of VOCs emitted for each compliance period**; and**

(7) The total amount of coatings used.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the three (3) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: - **Insignificant Activities**

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Four (4) open parts washers, identified as EU #12.

(j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.

(l) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables.

(r) ~~Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs: Armor painting area in one (1) paint booth, identified as EU #10, exhausting to general ventilation.~~

~~(s)~~ Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

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

D.4.1 Emission Offset Minor Limit [326 IAC 2-3]

~~(a)~~ The ~~VOC delivered to the applicators in the one (1) armor painting area, identified as EU #10 and the~~ VOC used by the four (4) open parts washers, identified as EU #12, shall be less than a total of ~~4.50~~ **3.00** tons of VOC~~, including coatings, dilution solvents, and cleaning solvents,~~ per twelve (12) consecutive month period**, with compliance determined at the**

end of each month. This usage limit is required to limit the source's potential to emit VOC to less than twenty-five (25) **tons** per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

~~D.4.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]~~

~~(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compounds (VOC) content of coatings delivered to the applicators in EU #10 metal coating operations shall be limited to 3.5 pounds of VOC per gallon of coating less water, for extreme performance coatings computed on a daily volume weighted basis. The daily volume weighted average of VOC content shall be calculated only when one (1) or more of the coating materials exceed a VOC content of 3.5 pounds of VOC per gallon of coating less water using the following formula, where n is the number of coatings (c):~~

$$\frac{\sum_{c=1}^{c=n} \text{coating c (gal)} \times \text{VOC content of c (lbs/gal, less water)}}{\sum_{c=1}^{c=n} \text{coating c (gal)}}$$

~~(b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~D.4.5 Volatile Organic Compounds (VOC)~~

~~Compliance with the VOC content and usage limitations contained in Conditions D.4.1 and D.4.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and Gary Air and Land Pollution Control reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.~~

D.4.~~7~~**5** Record Keeping Requirements

(a) To document compliance with Condition~~s~~ D.4.1 ~~and D.4.3~~, the Permittee shall maintain records in accordance with (1) through ~~(6)~~ **(3)** below. Records maintained for (1) through ~~(6)~~ **(3)** shall be taken daily monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Condition~~s~~ D.4.1 ~~and D.4.3~~.

(1) The amount and VOC content of each ~~coating material and~~ solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used~~. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents~~;

~~(2) A log of the dates of use;~~

~~(3) The volume weighted VOC content of the coatings used for each day, if necessary;~~

~~(4) The cleanup solvent usage for month;~~

~~(5)~~**(2)** The total VOC usage for each month; and

~~(6)~~**(3)** The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and ~~Gary Air and Land Pollution Control~~ Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
Mailing Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than ~~fifteen (15)~~ **16.5** tons per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

YEAR:

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and ~~Gary Air and Land Pollution Control~~ Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
Mailing Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
FESOP No.: F 089-5330-00161
Facility: One (1) paint booth, EU #15
Parameter: Gallons of paint with a density **no more than** ~~of~~ 21.3 pounds per gallon **and a solids content no more than 84%**
Limit: Less than ~~7,801~~ **9,435** gallons per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

YEAR:

Month	Gallons of Paint	Gallons of Paint	Gallons of Paint
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and ~~Gary Air and Land Pollution Control~~ Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
Mailing Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
FESOP No.: F 089-5330-00161
Facility: Two (2) plate sweep grinders, EU #11
Parameter: Area of steel plates swept
Limit: ~~136,817~~ **18,000** square feet of steel plates swept per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

YEAR:

Month	Steel Plates Swept (tons)	Steel Plates Swept (tons)	Steel Plates Swept (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and ~~Gary Air and Land Pollution Control~~ Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
Mailing Address: 86 North Bridge Street, Gary, Indiana ~~46368~~ **46404**
FESOP No.: F 089-5330-00161
Facility: Two (2) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: ~~68,281~~ **72,002** tons of steel slabs ground per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

YEAR:

Month	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and ~~Gary Air and Land Pollution Control~~ Gary Department of Environmental Affairs

FESOP Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46368
Mailing Address: 86 North Bridge Street, Gary, Indiana 46368
FESOP No.: F 089-5330-00161
Facility: ~~One (1) armor painting area, EU #10 and~~ Four (4) parts washers, EU #12
Parameter: ~~VOC including coatings, dilution solvents delivered to the applicators, and cleaning solvents plus~~ VOC usage ~~in the parts washers~~
Limit: Less than ~~four and one-half (4.5)~~ **3.00** tons per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month**.

YEAR:

Month	VOC (tons) This Month	VOC (tons) Previous 11 Months	VOC (tons) 12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.
Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Conclusion

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 089-20238-00161.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Industrial Steel Construction, Inc.**
Source Location:	**86 North Bridge Street, Gary, Indiana 46404**
County:	**Lake**
SIC Code:	**3441**
Operation Permit No.:	**F 089-5330-00161**
Significant Permit Revision No.:	**SPR 089-20238-00161**
Permit Reviewer:	**CarrieAnn Paukowits/MES**

On December 4, 2004, the Office of Air Quality (OAQ) had a notice published in the Post Tribune in Merrillville and The Times in Munster, Indiana, stating that Industrial Steel Construction, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to remove an insignificant activity and revise individual limits in the permit. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP and provided information on how the public could review the proposed Significant Permit Revision to a FESOP 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 Significant Permit Revision to a FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the FESOP. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

The following corrections have been made to the Table of Contents:

Compliance Determination Requirements
D.4.6**4** VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]
D.4.7**5** Record Keeping Requirements
D.4.8**6** Reporting Requirements

Change 2:

The spacing in the first paragraph of Section A has been corrected. The paragraph now reads:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Gary Department of Environmental Affairs. 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.

Change 3:

Since the plate sweep grinders and slab grinders are both identified as EU #11, items (h) and (i) of Section A.2 and the facility description box in Section D.1 have been revised as follows:

Grinding

(h) Two (2) plate sweep grinders, identified as **part of** EU #11, installed in 1990, capacity: 32,362 square feet of steel per month total, limited to 18,000 square feet of steel plates per twelve (12) consecutive month period, with compliance determined at the end of each month.

(i) Two (2) slab grinders, identified as **part of** EU #11, installed in 1991, capacity: 10,000 tons of slabs per month total, limited to 72,002 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month.

Change 4:

The Gary Department of Environmental Affairs has moved since the public notice period began for this revision. The address has been corrected in all places in the permit document as follows:

Gary Department of Environmental Affairs
~~Suite 1012~~
~~504 N.~~ **839** Broadway
Gary, Indiana 46402

Change 5:

The spacing in condition D.1.1(d) has been corrected. Condition D.1.1(d) now reads:

The input of rods to the twelve (12) electric arc stick welders, identified as EU #9 shall be limited to 50 tons of rods per twelve (12) consecutive month period, rolled monthly. This usage limit is required to limit the potential to emit PM and PM_{10} from the entire source to less than one hundred (100) tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70) not applicable.

Change 6:

In Conditions B.16, C.9(e), C.20, and D.2.1(b), "(c)" in the rule cites was inadvertently replaced with the copyright symbol. Although those conditions were not part of this revision, the conditions were correct in the previous version of the permit. Therefore, the conditions have not been added to the "Conditions Affected" box on the cover page of the permit, but they have been corrected to match the previous version of the permit. The corrections are as follows:

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]

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

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

C.20 General Reporting Requirements [326 IAC 2-8-4(3)~~(C)~~ **(c)**] [326 IAC 2-1.1-11]

D.2.1 Volatile Organic Compounds (VOC)Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

(b) Based upon 326 IAC 8-1-2~~(C)~~ **(c)** and a minimum overall control efficiency of 69.1% (the overall control efficiency equals: (capture efficiency) x (destruction efficiency)), the VOC content of the coating shall not exceed 21.6 pounds per gallon of coating solids delivered to the applicator.

Change 7:

The numbering in Section D.4 has been corrected, as follows:

D.4.~~8~~**6** Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses 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 not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Change 8:

The following corrections have been made to Conditions D.1.15 and D.4.5:

D.1.15 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1(a) and D.1.4, the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily **or** monthly**, as specified,** and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Conditions D.1.1(a) and D.1.4.

(1) The amount, density, and VOC and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The volume weighted VOC content of the coatings used for each day, if necessary;

(4) The cleanup solvent usage for month;

(5) The total VOC usage for each month;

(6) The weight of VOCs emitted for each compliance period; and

(7) The total amount of coatings used.

(b) To document compliance with Condition D.1.10, the Permittee shall maintain records of daily visible emission notations of the three (3) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.

(c) To document compliance with Condition D.1.11, the Permittee shall maintain the following:

(1) ~~Weekly~~ ~~records~~ **Records** of the following operational parameters **once per shift** during normal operation when venting to the atmosphere:

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle: frequency and differential pressure.

(2) Documentation of all response steps implemented, per event.

(3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.

(4) Quality Assurance/Quality Control (QA/QC) procedures.

(5) Operator standard operating procedures (SOP).

(6) Manufacturer's specifications or its equivalent.

(7) Equipment "troubleshooting" contingency plan.

(8) Documentation of the dates vents are redirected.

(d) To document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections required under Condition D.1.13 and the dates the vents are redirected.

(e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.5 Record Keeping Requirements

(a) To document compliance with Condition D.4.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken ~~daily~~ monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC content limits established in Condition D.4.1.

(1) The amount and VOC content of each solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;

(2) The total VOC usage for each month; and

(3) The weight of VOCs emitted for each compliance period

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.