



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: August 7, 2006
RE: Omega Steel & Contractor Supply / 089-23004-00508
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Registration

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

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

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

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

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

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

Enclosures
FN-REGIS.dot 03/23/06



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Mr. Craig Fowler
Omega Steel & Contractor Supply, Inc.
1640 E. Main Street
Griffith, Indiana 46319

August 7, 2006

Re: Registered Construction and Operation Status,
089-23004-00508

Dear Mr. Fowler:

The application from Omega Steel & Contractor Supply, Inc., received on April 24, 2006, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1 or 326 IAC 2-5.5, it has been determined that the following steel beam surface coating operation to be located at 1640 E. Main Street, Griffith, Indiana, 46319 is classified as registered:

One (1) steel beam surface coating operation, installed in 2000, using an airless spray guns and having a maximum throughput capacity of one hundred (100) feet of steel beam per hour and 1.25 gallons of paint per one hundred (100) feet of steel beam.

The following conditions shall be applicable:

- (a) 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:
 - (1) 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.
 - (2) 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.
- (b) Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), particulate from the surface coating operation shall be controlled by a dry particulate filter and the owner/operator shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the owner/operator shall inspect the control device and do either of the following no later than four (4) hours after such observation:

- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the owner/operator shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in



operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

- (c) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of the coating delivered to the applicator at the spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water.

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.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.5.

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

**Compliance Data Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251**

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

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

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Stacie Enoch, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7895 to speak directly to Ms. Enoch. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027 and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed By:
Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/SE

cc: File – Lake County
Lake County Health Department
Air Compliance Section Inspector – Rick Massoels
Northwest Regional Office
Permit Tracking Compliance Data Section
Office of Enforcement

Registration Annual Notification

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

Company Name:	Omega Steel & Contractor Supply, Inc.
Address:	1640 E. Main Street
City:	Griffith, Indiana 46319
Authorized individual:	Craig Fowler
Phone #:	(219) 934-8500
Registration #:	089-23004-00508

I hereby certify that Omega Steel & Contractor Supply, Inc. is still in operation and is in compliance with the requirements of Registration 089-23004-00508

Name (typed):
Title:
Signature:
Date:

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

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name:	Omega Steel & Contractor Supply, Inc.
Source Location:	1640 E. Main Street, Griffith, Indiana 46319
County:	Lake
SIC Code:	3441
Operation Permit No.:	R089-23004-00508
Permit Reviewer:	ERG/SE

The Office of Air Quality (OAQ) has reviewed an application from Omega Steel & Contractor Supply, Inc. relating to the operation of a steel beam surface coating operation.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units:

- (a) One (1) steel beam surface coating operation, installed in 2000, using an airless spray gun and having a maximum throughput capacity of one hundred (100) feet of steel beam per hour and 1.25 gallons of paint per steel beam.

Existing Approvals

No previous air approvals have been issued to this source.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and/or operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled "Unpermitted Emission Units and Pollution Control Equipment".
- (b) IDEM, OAQ is aware that between 2000 and June 2006, Omega Steel applied surface coatings to metal substrates using paints which had a VOC content that exceeded the 3.5 lbs/gallon limit allowed by 326 IAC 8-2-9. In June 2006, Omega Steel switched to using a low VOC coating and is now in compliance with this rule.
- (c) IDEM, OAQ is aware that Omega Steel is not in compliance with the particulate control requirements of 326 IAC 6-3-2(d) because they use an airless spray gun to apply surface coatings, use more than 5 gallons per day, and do not use controls.
- (d) IDEM is reviewing these matters and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the operation 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 April 24, 2006, with additional information received on June 2, 2006 and June 8, 2006.

Emission Calculations

See Appendix A of this document for detailed emission calculations Appendix A, pages 1 through 3).

Potential to Emit Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	13.4
PM-10	13.4
SO ₂	0
VOC	14.9
CO	0
NO _x	0

HAPs	Potential to Emit (tons/yr)
Cobalt 2-Ethylhexanoate	7.1 x 10 ⁻²
Total	7.1 x 10 ⁻²

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all regulated pollutants are less than 25 tons per year. The potential to emit of PM and PM10 are greater than five (5) tons per year and the potential to emit VOC is greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.5. A registration will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Maintenance Attainment
PM 2.5	Nonattainment
SO ₂	Primary Nonattainment
NO ₂	Attainment
1-hour Ozone	Severe Nonattainment
8-hour Ozone	Moderate Nonattainment
CO	Maintenance Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate

PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx 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. See the State Rule Applicability for the source section.
- (2) VOC and NOx 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 NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (c) Lake County has been classified as attainment or unclassifiable in Indiana for PM10, NO₂, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (d) The portion of Lake County in which this source is located has been classified as nonattainment in Indiana for SO₂. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (e) Fugitive Emissions
Since this type of operation is not one of the 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

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	13.4
PM-10	13.4
SO ₂	0
VOC	14.9
CO	0
NO _x	0
Single HAP	7.1×10^{-2}
Combination HAPs	7.1×10^{-2}

- (a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This new source is not a major stationary source because VOC is not emitted at a rate of 25 tons per year or greater and NOx, SO₂, and PM10 (as surrogate for PM2.5) are not

emitted at a rate of 100 tons per year or greater. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) VOC is less than 25 tons per year and all other criteria pollutants are less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this registration.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this registration.
- (c) The requirements of 40 CFR 63, Subpart M – National Emission Standards for Miscellaneous Metal Parts and Products Surface Coating Operations are not included in this registration because this source is not a major source of hazardous air pollutants.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment Area New Source Review)

This source was constructed in 2000 and is not in one of the 28 listed source categories. The source is located in Lake County, which is currently in attainment for PM₁₀, NO₂, CO, and lead, and nonattainment for PM_{2.5}, SO₂, and the 1-hour (severe) and 8-hour ozone standards. This source initially used a coating with a VOC content of 3.87 pounds per gallon, which resulted in a potential to emit VOC of 21.2 tons per year. In June 2006, Omega Steel agreed to change to a new coating that has a VOC content of 2.73 pounds per gallon and results in a potential to emit VOC of 14.9 tons per year. The actual VOC emissions in 2005 were 6.81 tons based on purchase records. Omega Steel also indicated that the amount of surface coating performed by this facility had increased gradually between July 2000 and December 2005. Therefore, the 2005 usage data is believed to represent the maximum actual VOC emitted per year. Since the potential VOC emissions did not exceed 25 tons per year, this source has not triggered 326 IAC 2-3.

This source is classified as a minor source under 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment Area New Source Review) because:

- (1) The potential to emit of NO₂ and CO are less than 250 tons per year;
- (2) The potential to emit of PM₁₀, SO₂, and NO_x are less than 100 tons per year; and
- (3) The potential to emit VOC using the new coating is less than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County, is not required to operate under the Part 70 permit program, the potential to emit of VOC and NO_x are less than twenty-five (25) tons per year, and the potential to emit of lead is less than five (5) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is located in the portion of Lake County identified in 326 IAC 5-1-1(c)(4) and, therefore, it is subject to the more stringent opacity limitations in 326 IAC 5-1-2(2)(B). The following requirements have been included in the registration:

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 the 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.

326 IAC 6.8-1 (Particulate Matter Limitations for Lake County)

This source is not subject to the requirements of 326 IAC 6.8-1-2 because the source is not listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, does not have a potential to emit equal to or greater than 100 tons of particulate per year, and does not have actual emissions of equal to or more than 10 tons per year.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to the requirements of 326 IAC 8-6 because it was constructed after January 1, 1980.

State Rule Applicability – Surface Coating Operation

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

Although constructed after July 27, 1997, this source is not subject to the requirements of 326 IAC 2-4.1 because this source has a potential to emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The surface coating booth is subject to the requirements of 326 IAC 6-3 because spray guns are used to apply the coating and Omega Steel uses greater than 5 gallons of coating per day.

Particulate from the surface coating operation shall be controlled by a dry particulate filter and the owner/operator shall operate the control device in accordance with manufacturer's specifications.

If overspray is visibly detected at the exhaust or accumulates on the ground, the owner/operator shall inspect the control device and do either of the following no later than four (4) hours after such observation:

Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the owner/operator shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

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

The surface coating operation is subject to the requirements of 326 IAC 8-2-9 because this facility was constructed after July 1, 1990 and uses greater than 15 pounds per day of VOC.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of the coating delivered to the applicator at the surface coating operation shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

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.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

Although constructed after January 1, 1980, the surface coating facility is not subject to the requirements of 326 IAC 8-1-6 because this facility is subject to the requirements of 326 IAC 8-2-9. Facilities subject to the requirements of another Article 8 rules are exempt from 326 IAC 8-1-6.

Conclusion

The operation of this steel beam coating operation shall be subject to the conditions of the Registration 089-23004-00508.

**Appendix A: Emissions Calculations
Actual VOC and Particulate Emissions
From Surface Coating Operations**

**Company Name: Omega Steel & Contractor Supply
Address: 1640 E Main Street, Griffith, Indiana 46319
Review Request: 039-23004-00508
Reviewer: ERG/SE
Date: July 25, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Solids	**Actual Usage (gal/yr)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Actual VOC Emissions (ton/yr)	Actual VOC Emissions (lbs/day)	Actual Particulate Emissions (ton/yr)	*Transfer Efficiency %
Sherwin-Williams Steel Spec (new coating)	12.91	21.1%	76.0%	3,520	2.73	2.73	4.80	26.3	4.32	75%
Sherwin-Williams Red Oxide (original coating)	9.72	39.8%	39%	3,520	3.87	3.87	6.81	37.3	2.57	75%

*Transfer Efficiency is from AP-40 for airless spray gun used to coat a flat surface.

**Actual usage based on purchase records for 2005

This table represents actual emissions if Omega Steel uses the same amount of the new coating as they used of their current coating in 2005.

METHODOLOGY

Weight % Volatile (H2O & Organics) = Pounds VOC per gallon of coating / Density (lb/gal)

Actual VOC (ton/yr) = Pounds of VOC per Gallon coating (lb/gal) * Actual Usage (gal/yr) * 1 ton/2000 lbs

Actual VOC (lbs/day) = Actual VOC Emissions (ton/yr) x 2000 lbs/ton x 1 year/365 days

Actual Particulate (ton/yr) = Actual Usage (gal/yr) * Density (lbs/gal) * Weight % Solids * (1-Transfer efficiency) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Potential VOC and Particulate Emissions
From Surface Coating Operations**

**Company Name: Omega Steel & Contractor Supply
Address: 1640 E Main Street, Griffith, Indiana 46319
Review Request: 039-23004-00508
Reviewer: ERG/SE
Date: July 25, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Solids	Usage (gal/unit)	**Maximum Throughput (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	PTE VOC (lb/hr)	PTE VOC (lb/day)	PTE VOC (ton/yr)	PTE Particulate (ton/yr)	*Transfer Efficiency %
Sherwin-Williams Steel Spec (new coating)	12.91	21.1%	76.0%	1.25	1.00	2.73	2.73	3.41	82	14.9	13.4	75%
Sherwin-Williams Red Oxide (original coating)	9.72	39.8%	60.2%	1.25	1.00	3.87	3.87	4.84	116	21.2	8.0	75%

*Transfer Efficiency is from AP-40 for airless spray gun used to coat a flat surface.

**1 unit = 100 ft

METHODOLOGY

Weight % Volatile (H2O & Organics) = Pounds VOC per gallon of coating / Density (lb/gal)

PTE VOC (lb/hr) = Pounds of VOC per Gallon coating (lb/gal) * Usage (gal/unit) * Maximum Throughput (units/hr)

PTE VOC (lb/day) = Pounds of VOC per Gallon coating (lb/gal) * Usage (gal/unit) * Maximum Throughput (units/hr) * 24 hr/day

PTE VOC (ton/yr) = Pounds of VOC per gallon coating (lb/gal) * Usage (gal/unit) * Maximum Throughput (units/hr) * 8760 hr/yr * 1 ton/2000 lbs

PTE Particulate (ton/yr) = Maximum Throughput (units/hour) * Usage (gal/unit) * Density (lbs/gal) * Weight % Solids * (1-Transfer Efficiency) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
HAP Emissions
From Surface Coating Operations**

**Company Name: Omega Steel & Contractor Supply
Address: 1640 E Main Street, Griffith, Indiana 46319
Review Request: 039-23004-00508
Reviewer: ERG/SE
Date: July 25, 2006**

Material	Density (lb/gal)	Usage (gal/unit)	*Maximum Throughput (unit/hr)	Weight % Cobalt 2-Ethylhexanoate	Weight % Ethyl Benzene	Weight % Xylene	PTE Cobalt 2-Ethylhexanoate (ton/yr)	PTE Ethyl Benzene (ton/yr)	PTE Xylene (ton/yr)
Sherwin-Williams Steel Spec (new coating)	12.91	1.25	1.00	0.10%	0.00%	0.00%	0.07	0.00	0.00
Sherwin-Williams Red Oxide (original coating)	9.72	1.25	1.00	0.00%	0.30%	1.00%	0.00	0.16	0.53

*1 unit = 100 ft

PTE Total HAPs (new coating) (ton/yr) = 7.1E-02

METHODOLOGY

PTE HAPs (ton/yr) = Density (lb/gal) * Usage (gal/unit) * Maximum Throughput (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs