



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: November 21, 2006
RE: Industrial Steel Construction, Inc. / 089-23141-00161
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office 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
FNPER.dot 03/23/06



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

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Commissioner

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

November 21, 2006

Re: 089-23141-00161
Significant Source Modification to:
Part 70 Operating Permit No.: T 089-22406-00161

Dear Mr. Moore:

Industrial Steel Construction, Inc. was issued Part 70 Operating Permit T 089-22406-00161 on August 4, 2006 for a metal structural fabricating source located at 86 North Bridge Street, Gary, Indiana 46404. An application to modify the source was received on May 25, 2006. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Girder Shop

- (h) One (1) paint booth, identified as EU#22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and three (3.0) tons of PM/PM₁₀ emissions per twelve (12) consecutive month period.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission unit. Operating conditions shall be incorporated into the Part 70 Operating Permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

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 contact Michael A. Morrone, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251, at 631-691-3395, ext. 15 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

MAM/MES
Attachment Appendix A
cc: File - Lake County
Lake County Health Department
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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PART 70 PERMIT SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY

**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.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. 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.

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 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. ***This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures 326 IAC 2-7-10.5, applicable to those conditions.***

Operation Permit No.: T 089-22406-00161	
Issued by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 4, 2006 Expiration Date: August 4, 2011

Operation Permit No.: SSM 089-23141-00161	Conditions Affected: A.2, D.1.1 through D.1.19, Report Forms
Original signed by Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: November 21, 2006 Expiration Date: August 4, 2011

SECTION A

SOURCE SUMMARY

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

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 identified as #1 for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour.

Annex

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19.5 tons of VOC delivered to the applicators per twelve (12) consecutive month period and 2.0 tons of PM/PM₁₀ emissions per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, capacity: 2.477 pounds of rods per minute, limited to 650 tons of rods per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a 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, with compliance determined at the end of each month.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18, capacity: a maximum throughput of 328,500 lineal feet of steel plate per twelve (12) consecutive month period.
- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The new blaster would clean scale from steel girders using steel shot.
- (h) One (1) paint booth, identified as EU#22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and three (3.0) tons of PM/PM₁₀ emissions per twelve (12) consecutive month period.

Grinding

- (i) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 75 square feet of steel per hour 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.
- (j) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 613,200 tons of slabs per year total, limited to 111,116 tons of steel slabs per twelve (12) consecutive month period.

“A” Building

- (k) One (1) paint booth, identified as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausted through Stack #10, capacity: limited to 10,498 gallons of paint and 536 gallons of solvents per twelve (12) consecutive month period.
- (l) One (1) mechanical blaster/blowoff, identified as EU #19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, capacity: 700 linear feet of steel plate per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, installed in 1968, exhausting through Stack #1, capacity: a maximum media throughput of 160,800 pounds per hour or 720 linear feet of steel plates and shapes per hour.

Annex

- (b) One (1) mechanical blaster, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, installed in 1990, exhausting through Stack #2, capacity: a maximum media throughput of 187,600 pounds per hour or 480 linear feet of steel plates per hour.

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19.5 tons of VOC delivered to the applicators per twelve (12) consecutive month period and 2.0 tons of PM/PM₁₀ emissions per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, capacity: 2.477 pounds of rods per minute, limited to 650 tons of rods per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a 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, with compliance determined at the end of each month.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18, capacity: a maximum throughput of 328,500 linear feet of steel plate per twelve (12) consecutive month period.
- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The new blaster would clean scale from steel girders using steel shot.
- (h) One (1) paint booth, identified as EU #22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and limited to less than three (3.0) tons of PM and PM₁₀ emissions per twelve (12) consecutive month period.

Grinding

- (i) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 75 square feet of steel per hour 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.
- (j) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 613,200 tons of slabs per year total.

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

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

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following requirements:

- (a) The one (1) paint booth, identified as EU #15, shall emit less than two (2.0) tons of PM/PM₁₀ per twelve (12) consecutive month period calculated using the following formula:

$$\text{PM/PM}_{10} \text{ (tpy)} = (\text{gal used/yr}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000\text{lb}) \\ \times (1 - 99\% \text{ transfer and enclosure efficiency})$$

Compliance shall be determined at the end of each month. The paint booth EU #15 shall be enclosed in a permanent total enclosure.

- (b) The mechanical blaster, identified as EU #1 equipped with a baghouse for particulate matter control, shall have PM/PM₁₀ emissions of less than 2.68 pounds per hour. These conditions are necessary in order to limit the PM and PM₁₀ PTE from EU#1 to less than 11.74 tons per year.
- (c) The mechanical blaster, identified as EU #2 and equipped with a baghouse for particulate matter control, shall emit less than 0.59 pounds of PM/PM₁₀ per hour. These conditions are necessary in order to limit the PM and PM₁₀ PTE from EU#2 to less than 2.57 tons per year.
- (d) The input of rods to the electric arc stick welders, identified as part of EU #9 shall be limited to 650 tons of rods per twelve (12) consecutive month period, with compliance determined at the end of each month and shall emit less than 18.4 pounds of PM/PM₁₀ per 1000 pounds of rod. This usage limit is required to limit the potential to emit PM and PM₁₀ from EU #9 to 11.98 tons per year.
- (e) The input of steel plates to the two (2) plate sweep grinders, identified as part of EU #11, shall emit less than 0.0925 pounds of PM/PM₁₀ per square foot of plate swept and 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. These conditions are necessary in order to limit the PM/PM₁₀ PTE from the two (2) plate sweep grinders to less than 0.833 tons per year.
- (f) The input of steel slabs to the two (2) slab grinders, identified as part of EU #11, shall emit less PM/PM₁₀ than 0.0493 percent of the weight in tons of steel slab ground and shall be limited to 111,116 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month. These conditions are necessary in order to limit the PM/PM₁₀ PTE from the two (2) steel slab grinders to less than 54.78 tons per year.
- (g) The emissions of PM/PM₁₀ from the forty-nine (49) torches, identified as EU #13, shall be limited to less than 0.0815 pounds per 1000 inch of 1 inch thick steel cut with a total of 34,601,227 inches of one (1) inch steel cut per twelve (12) consecutive month period, with compliance determined at the end of each month. These conditions are necessary in order to limit the PM/PM₁₀ PTE from EU #13 to less than 1.96 tons per year.
- (h) Mechanical blaster #3, identified as EU #18 and equipped with a baghouse identified as #18 for particulate matter control, shall emit less than 0.58 pounds of PM/PM₁₀ per hour. These conditions are necessary in order to limit the PM and PM₁₀ PTE from EU#18 to less than 2.53 tons per year.
- (i) Mechanical blaster #5, identified as EU #21 and equipped with a baghouse identified as #21 for particulate matter control, shall emit less than 2.57 pounds of PM/PM₁₀ per hour. These

conditions are necessary in order to limit the PM and PM₁₀ PTE from EU#21 to less than 11.26 tons per year.

- (j) The one (1) paint booth, identified as EU #22, shall emit less than three (3.0) tons of PM/PM₁₀ per twelve (12) consecutive month period calculated using the following formula:

$$\text{PM/PM}_{10} \text{ (tpy)} = (\text{gal used/yr}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000\text{lb}) \times (1 - 99\% \text{ transfer and enclosure efficiency})$$

Compliance shall be determined at the end of each month. The paint booth EU #22 shall be enclosed in a permanent total enclosure.

D.1.2 Emission Offset [326 IAC 2-3-2]

- (a) The one (1) paint area, identified as EU #15, shall use less than 19.5 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 structured such that when including the VOC emissions from EU #15, EU #20 and all insignificant sources, the total VOC emissions remain below twenty-five (25) tons per year per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

- (b) The one (1) paint booth, identified as EU #22, shall use less than forty (40) 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. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) Limit [326 IAC 2-4.1] (MACT)

- (a) The methyl ethyl ketone (MEK) emissions from EU#15, EU #20 and EU #22 metal coating operations shall be limited to a total less than 10 tons per twelve (12) consecutive month period, with compliance determined at the end of each month according to the following equation:

$$\text{MEK Emissions (tons)} = \sum_{i=1}^n \frac{[\text{MEK content (lb/gal)}]_i [\text{paint or solvents applied by sprayers (gal)}]_i [1 - O]_i}{2000 \text{ lb/tn}}$$

where m = the number of months and n = the number of coatings and solvents used.

O = Equivalent overall efficiency of the capture system and control device as a percentage for EU #20 only as calculated in Condition D.2.3(c), O = 0% for both EU #15 and EU #22

- (b) The combination of HAPs from EU #15, EU# 20 and EU #22 metal coating operations shall be limited to a total of less than twenty one and five tenths (21.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) Compliance with these HAPs limits shall limit the entire source emissions to less than ten (10) tons of any single HAP per year and less than twenty-five (25) tons per year for all HAPs. Therefore, 326 IAC 2-4.1(MACT) does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6.8-1-2]

- (a) The particulate matter (PM) emissions from each of the four (4) blasters, identified as EU #1, EU #2, EU #18 and EU #21, shall not exceed 0.03 grains per dry standard cubic foot. This requirement shall be satisfied through compliance with Condition D.1.1.

- (b) The particulate matter (PM) emissions from EU #9, EU #11, EU #13 and EU #17, shall not exceed 0.03 grains per dry standard cubic foot.

D.1.5 Particulate Matter (PM) [326 IAC 6.8-1-2]

The particulate matter (PM) emissions from the paint booth, identified as EU #15, and the paint booth, identified as EU #22, shall each not exceed 0.03 grains per dry standard cubic foot.

D.1.6 Volatile Organic Compounds (VOCs) [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 and EU #22 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 on days 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):

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

- (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.1.7 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint area, identified as EU #15, and the paint booth, identified as EU #22, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.8 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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, EU #17, EU #21, and EU #22, and any control devices.

Compliance Determination Requirements

D.1.9 Hazardous Air Pollutant Emissions

Compliance with the MEK emission limits and the combination of HAPs emission limitations contained in Condition D.1.3 shall be determined pursuant to 40 CFR 63.3941 using formulation data supplied by the coating and solvent manufacturers. IDEM, OAQ reserves the authority to determine compliance using Method 311 in 40 CFR 63 Appendix A. Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each quarter based on the total MEK used by the sprayers and the combination of HAPs for each of the quarter's three most recent twelve (12) month periods.

D.1.10 Testing Requirements [326 IAC 2-7-6(5)(c)][326 IAC 2-1.1-11]

In order to comply with Condition D.1.1, within five (5) years of October 8, 2003, the Permittee shall perform PM and PM₁₀ testing of EU #1, EU #2, and EU #18 (blasters #1,#2 and #3) utilizing test 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. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

Within 60 days after achieving capacity, but no later than 180 days after startup, the Permittee shall perform PM and PM₁₀ testing of EU #21 (blaster #5) utilizing test 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. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with Section C - Performance Testing.

D.1.11 Volatile Organic Compounds (VOCs)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 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.

D.1.12 VOC Emissions

Compliance with Condition D.1.2 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 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.13 Particulate Matter (PM)

- (a) In order to comply with Condition D.1.4, the baghouses for PM control shall be in operation and control emissions from the EU #1, EU #2, EU #18 and EU #21 (blasters #1, #2, #3 and #5) 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.1.14 Visible Emissions Notations [326 IAC 2-7-6]

- (a) Visible emission notations of the blaster stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per day 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) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.1.15 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the blasting processes, at least once per day when the blasting processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses for blasters #1 and #2 is outside the normal range of 2.0 and 6.0 inches of water and the normal range of 1.0 and 5.0 inches of water for blasters #3 and #5 or a range established during the latest stack tests, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - 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.1.16 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 while one or more of the DB torches in EU #13 are in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.17 Broken or Failed Bag Detection

- (a) For a single compartment baghouse, controlling emissions from a process operated continuously, failed units and the associated process shall 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).
- (b) For a single compartment baghouse, controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

D.1.18 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.2 and D.1.6. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on daily basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the single HAP and combination of HAPs emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.
- (1) The HAP content of each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The single HAP and combination of HAPs usage for each month; and
 - (4) The weight of the worst case single HAP and combination of HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.14 the Permittee shall maintain records of daily visible emission notations of the four (4) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.
- (d) To document compliance with Condition D.1.15, the Permittee shall maintain a record of the pressure drops once per day during normal operation when venting to the atmosphere.
- (e) To document compliance with Condition D.1.16, the Permittee shall maintain a record of the inspections once per day while one or more of the DB torches in EU #13 are in operation.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.19 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 (a) through D.1.1(j), D.1.2 and D.1.3 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

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
Permit No.: T089-22406-00161
Facility: One (1) paint booth, EU #22
Parameter: VOC usage including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than 40 tons VOC per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

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
 Permit No.: T089-22406-00161
 Facility: One (1) paint booth, EU #22
 Parameter: PM/PM₁₀ including coatings, dilution solvents delivered to the applicators, and cleaning solvents
 Limit: Less than 3.0 tons PM₁₀ per twelve (12) consecutive month period, with compliance determined at the end of each month.

$$PM/PM_{10} \text{ (tpm)} = (\text{gal used/mo}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000 \text{ lb}) \times (1 - 99\% \text{ transfer and enclosure efficiency}) - (\text{tons paint disposed/mo}) \times (\text{average weight \% solids})$$

YEAR: _____

Month	PM/PM ₁₀ Emitted (tons)	PM/PM ₁₀ Emitted (tons)	PM/PM ₁₀ Emitted (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

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
Permit No.: T089-22406-00161
Facilities: EU #15, EU #20 and EU #22, paint booths
Parameter: methyl ethyl ketone (MEK) usage
Limit: Total less than 10.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

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
Permit No.: T 089-22406-00161
Facilities: EU #15, EU #20 and EU #22, paint booths
Parameter: Total Combination HAP usage
Limit: Total Combination HAP usage less than 21.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Combination HAPs (tons)	Total Combination HAPs (tons)	Total Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, Indiana 46404
County:	Lake
SIC Codes:	3441 and 3449
Operation Permit No.:	T 089-22406-00161
Operation Permit Issuance Date:	August 4, 2006
Significant Source Modification No.:	089-23141-00161
Significant Permit Modification No.:	089-23325-00161
Permit Reviewer:	Michael A. Morrone

Existing Approvals

The source was issued a Part 70 Operating Permit T 089-22406-00161 on August 4, 2006. There have been no subsequent approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
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. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. 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 emission offset, 326 IAC 2-3.
- (b) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment 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 a surrogate for PM_{2.5} emissions pursuant to the Nonattainment New Source Review requirements. See the State

Rule Applicability for the source section.

- (c) On August 7, 2006, a temporary emergency rule took effect redesignating Lake County to attainment for the sulfur dioxide standard and revoked the 1-hour ozone standard. Lake County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO₂, CO, and Lead. 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 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	110.25
PM ₁₀	110.76
SO ₂	0.058
VOC	24.03
CO	7.947
NO _x	9.47

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no regulated pollutant is emitted at a rate of two hundred and fifty (250) tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because a nonattainment regulated pollutant (PM₁₀, a surrogate for PM_{2.5}) is emitted at a rate of one hundred (100) tons per year or more).
- (c) These emissions are based upon page 9 of 10 in Appendix A of the TSD in Part 70 Operating Permit T 089-22406-00161.
- (d) There is no change in the source status due to the emergency rule which took effect on August 7, 2006.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Methylnaphthalene	.000002
Antimony	0.293
Arsenic	0.0160
Benzene	0.0006
Cadmium	0.0006

HAPs	Potential To Emit (tons/year)
Chromium	0.161
Cobalt	0.0096
Dichlorobenzene	0.0001
Ethyl benzene	0.0003
Fluoranthene	0.0000003
Fluorene	0.0000003
Formaldehyde	0.0073
Hexane	0.175
Lead	0.298
Manganese	1.28
Mercury	0.00003
Methanol	0.593
Methyl tert-butyl ether	0.0013
Naphthalene	0.0010
Nickel	0.137
Phenanathrene	0.000002
Pyrene	0.0000005
Toluene	0.0003
Xylenes	0.0002
Total	2.97

This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are less than ten (10) tons per year for any single HAP and twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2004 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	not reported
PM ₁₀	0.8061
SO ₂	0.0081
VOC	21.36
CO	1.134
NO _x	1.35
HAP	not reported

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Industrial Steel Construction, Inc. on May 25, 2006, relating to the construction and operation of a new paint booth, identified as EU #22. The following is a description of the new emission unit:

One (1) paint booth, identified as EU#22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and three (3.00) tons of PM/PM₁₀ emissions per twelve (12) consecutive month period.

In addition, the source requested revisions to the issued Part 70 Permit. These changes are documented in detail in the "Proposed Changes" section of this TSD.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

The proposed paint booth, identified as EU #22, exhausts to general ventilation, and does not utilize any of the stacks at the source.

Emission Calculations

See page 1 of Appendix A of this document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emission 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, IDEM, or the appropriate local air pollution control agency."

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	80.3
PM ₁₀	80.3
SO ₂	0.00
VOC	288.2
CO	0.00
NO _x	0.00

Limited HAPs	Potential To Emit (tons/year)
MEK	Less Than 10
Total	Less Than 25

This significant source modification is subject to 326 IAC 2-7-10.5 (f)(4)(D) because this modification consists of construction of a new emission unit with the potential to emit VOC greater than twenty-five (25) tons per year and requires both VOC and PM emission limits. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because it requires a case-by-case determination of an emission limitation or other standard and, therefore, does not qualify as minor permit modification or administrative amendment.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 Permit Modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Paint Booth (EU #22)	Less Than 3.0	Less Than 3.0	-	Less Than 40	-	-	MEK Less Than 10, Combination Less Than 21.5
Total for Modification	Less Than 3.0	Less Than 3.0	-	Less Than 40	-	-	Single Less Than 10, Combination Less Than 21.5
Significant Levels	25	15	40	40	100	40	-

This modification to an existing major stationary source is not major because the emission increase of VOC will be limited to less than forty (40) tons per year to keep the increase less than the Emission Offset significant level of forty (40) tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

The Part 70 Operating Permit, T 089-22406-00161, issued on August 4, 2006 permitted a new mechanical blaster #5, identified as EU #21, equipped with a baghouse, identified as #21, for particulate matter control and exhausting through Stack # 11.

Pursuant to T 089-22406-00161, the mechanical blaster #5, identified as EU #21, shall emit less than 2.57 pounds of PM/PM₁₀ per hour. These limits for EU #21 were necessary in order to limit the potential to emit PM and PM₁₀ to less than 11.26 tons per year.

PM and PM₁₀ are being limited to less than three (3.0) tons per year from the proposed paint booth, identified as EU #22. Therefore, the total PM and PM₁₀ emissions from the mechanical blaster #5, identified as EU #21, installed in 2006 and the proposed paint booth, identified as EU #22, are limited to less than 14.3 tons per year which is less than the PSD significant levels of twenty five (25) tons per year for PM and fifteen (15) tons per year for PM₁₀. Hence, the requirements of 326 IAC 2-2, PSD, do not apply to either of these modifications.

Lake County has been designated as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment pollutant. Industrial Steel Construction, Inc. has a limited potential to emit of PM₁₀ above one hundred (100) tons per year. Assuming that PM₁₀ emissions represent PM_{2.5} emissions, the requirements of 326 IAC 2-3 do not apply for this modification.

Any single HAP from the entire source shall be limited to less than ten (10) tons per year and the combinations of all HAPs from EU #15, EU #20 and EU #22 shall be limited to less than 21.5 tons per year coupled with the potential HAPs from all other emission units and insignificant activities shall limited the entire source to less than a total of twenty five (25) tons of the combination of HAPs. Therefore, this source will remain an area source for HAPs.

Potential to Emit PM/PM₁₀ of the Entire Source after the Modification

Emission Unit	Potential to Emit PM/PM ₁₀ (tons/year)
EU#1	11.7
EU#2	2.57
EU#9	12.0
EU#11	55.6
EU#13	1.96
EU#15	Less than 2.00
EU#18	2.53
EU#19	5.45
EU#21	11.3
EU#22	Less than 3.00
Total	Less than 108.1

Potential to Emit VOC and HAPs of the Entire Source after the Modification

Emission Unit	Potential to Emit VOC (tons/year)	Potential to Emit HAPs (tons/year)
EU#12	1.50	0
EU#15	19.5	Single less than 10 Combination less than 21.5
EU#20	1.51	
EU#22	Less than 40	
Total	Less than 62.5	Less than 10/25 with all other emission units and insignificant activities

Potential to Emit of the Entire Source after the Modification

The potential to emit from the entire source after the modification is summarized in the following table.

Pollutant	Potential To Emit (tons/year)
PM	Less Than 108.1
PM ₁₀	Less Than 108.1
SO ₂	0.00
VOC	Less Than 62.5
CO	0.00
NO _x	0.00

Limited HAPs	Potential To Emit (tons/year)
Single HAP	Less Than 10
Combination of HAPs	Less Than 25

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this proposed modification.
- (b) The source is a minor source for HAPs. Industrial Steel Construction, Inc. has already chosen to limit the emissions of any single HAP to less than ten (10) tons per year and the emissions of the combination of HAPs to less than twenty-five (25) tons per year in the Part 70 Operating Permit, T 089-22406-00161, issued on August 4, 2006. Therefore, the requirements of 63 CFR, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products, are not included in this modification.
- (c) There are no other National Emission Standards for Hazardous Air Pollutants included in this modification.

The following table is used to identify the applicability of each of the applicability criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled VOC PTE (tons/year)	Controlled VOC PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU # 22	None	Y	288.2	Less than 40	100	N	N

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PM/PM ₁₀ PTE (tons/year)	Controlled PM/PM ₁₀ PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU # 22	None	Y	80.3	Less than 3.0	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to the new unit as part of this modification.

State Rule Applicability Determination
--

The following state rules are applicable to the source due to the modification:

1. 326 IAC 2-1.1-5 (Air quality requirements)

Lake County has been designated as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM_{2.5} Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM_{2.5} major NSR regulations, states should assume that a major stationary source's PM₁₀ emissions represent PM_{2.5} emissions. IDEM will use the PM₁₀ nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM_{2.5} NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit one hundred (100) tons per year of any nonattainment pollutant. Industrial Steel Construction, Inc. has a limited potential to emit of PM₁₀ below one hundred (100) tons per year for this modification. Therefore, assuming that PM₁₀ emissions represent PM_{2.5} emissions, 326 IAC 2-3 does not apply.

2. 326 IAC 2-2 Prevention of Significant Deterioration (PSD)

This modification to a minor stationary source under PSD is minor because the emission increases for attainment pollutants are less than the significant levels for a major source, pursuant to 326 IAC 2-2, PSD.

The proposed paint booth, identified as EU #22, is being installed so that the source can increase the number of coats of paint that get applied to each steel bridge girder. As a result, there will be no increased utilization at any other facilities at the source.

The Part 70 Operating Permit, T 089-22406-00161, issued on August 4, 2006 permitted a new mechanical blaster #5, identified as EU #21, equipped with a baghouse, identified as #21, for particulate matter control and exhausting through Stack # 11.

Pursuant to T 089-22406-00161, the mechanical blaster #5, identified as EU #21, shall emit less than 2.57 pounds of PM/PM₁₀ per hour. These limits for EU #21 were necessary in order to limit the potential to emit PM and PM₁₀ to less than 11.26 tons per year.

PM and PM₁₀ are being limited to less than three (3) tons per year from the proposed paint booth, identified as EU #22. Therefore, the total PM and PM₁₀ emissions from the mechanical blaster #5, identified as EU #21, installed in 2006 and the proposed paint booth, identified as EU #22, are limited to less than 14.3 tons per year which is less than the PSD significant levels of twenty five (25) tons per year for PM and fifteen (15) tons per year for PM₁₀. Hence, the requirements of 326 IAC 2-2, PSD, do not apply to either of these modifications. The PM/PM₁₀ emission limits in the proposed permit utilize the same methodology as that for EU #21.

3. 326 IAC 2-3 (Emission Offset)

This modification to a major stationary source is minor because the emission increases for nonattainment pollutants are less than the significant levels for a major source, pursuant to 326 IAC 2-3, Emission Offset.

The VOC emissions from the proposed paint booth, identified as EU #22, are being limited to less than forty (40) tons per year, which is less than the Emission Offset significant level of forty (40) tons per year. Hence, the requirements of 326 IAC 2-3, Emission Offset, do not apply to the proposed

modification.

4. 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

HAPs emissions from this source will still be limited to less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for the combination of HAPs. The combination of HAPs from EU #15, EU #20 and EU #22 have been limited to less than 21.5 tons per year. Therefore, 326 IAC 2-4.1 does not apply to this modification.

5. 326 IAC 2-6 (Emission Reporting)

Since this source, located in Lake County, is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting).

- (a) In accordance with the compliance schedule in 326 IAC 2-6-3(a)(1), an emission statement must be submitted annually if the actual emissions are equal to or greater than twenty-five (25) tons of volatile organic compounds or nitrogen oxides.
- (b) In accordance with the compliance schedule in 326 IAC 2-6-3(b)(1), an emission statement must be submitted starting in 2004 and every three (3) years thereafter, if the actual emissions are less than twenty-five (25) tons of volatile organic compounds or nitrogen oxides.
- (c) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

6. 326 IAC 6.8-1-2 (Particulate Matter Limitations)

Pursuant to 326 IAC 6.8-1-1(a)(2)(A), although the source or facility, which is located in Lake County, is not specifically listed in 326 IAC 6.8-2 through 326 IAC 6.8-11, it has the potential to emit one hundred (100) tons of particulate matter per year. Therefore, the two (2) paint booths, identified as EU #15 and EU # 22 are subject to 326 IAC 6.8-1-2. This rule requires that the particulate matter (PM) emissions from the paint booth, identified as EU #15, and the paint booth, identified as EU #22, shall each not exceed 0.03 grains per dry standard cubic foot

7. 326 IAC 8-2-9 (Miscellaneous Metal Coating)

The one (1) paint booth, identified as EU#22, with actual emissions of fifteen (15) pounds per day is located in Lake County and will be constructed after July 1, 1990. Therefore, pursuant to 326 IAC 8-2-1(a)(4), the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating Operations, are included in the permit for the proposed paint booth.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booth, identified as EU #22, shall be limited to 3.5 pounds of VOC per gallon of coating less water, delivered to HVLP spray applicators.

Industrial Steel Construction requires the flexibility to use a wide variety of paints containing various concentrations of VOCs in order to meet customer specifications. Therefore, in order to ensure compliance with the requirements of 326 IAC 8-2-9, volume weighted averaging of all coatings used per day will be required.

The daily volume weighted average of VOC content from EU # 22 shall be calculated only on days 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):

$$\frac{c = n}{c = 1} \times 3 \text{ coating } c \text{ (gal) H VOC content of } c \text{ (lbs/gal, less water)}$$
$$\frac{c = n}{c = 1} \times 3 \text{ coating } c \text{ (gal)}$$

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.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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.

The compliance determination requirements for the paint booth, identified as EU #22 applicable to this modification are as follows:

Compliance with the VOC content used in the equation to calculate the daily volume weighted average and VOC usage limitations 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 and solvent manufacturers. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

There are no compliance monitoring requirements included in this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T 089-22406-00161. Deleted language appears as ~~strikethroughs~~ and new language appears in bold:

Changes to Permit to Incorporate EU #22 Paint Booth

Change 1:

The Permittee is proposing to add a paint booth, identified as EU#22, to the Girder Shop to expand their capabilities of painting steel girders. No control device is being used for particulate matter emissions. However, the source is limiting VOC usage to less than forty (40) tons per year and is limiting PM/PM₁₀ emissions to less than three (3.0) tons per year. The calculation of actual PM/PM₁₀ emissions to show compliance with the limits in Condition D.1.1(j) is using the same equation that is included in Condition D.1.1(a) that calculated PM/PM₁₀ emissions for the existing paint booth,

identified as EU#15. In Conditions D.1.1(a) and (j), the end of the equation has been deleted since a test would have to be performed to determine the amount of disposed paint each and every time. Therefore, Condition D.1.1(a) has been revised. Both paint booths coat large steel bridge girders and are similar in operation. It is necessary to calculate PM/PM₁₀ emissions using this formula because Industrial Steel Construction, Inc. utilizes a wide variety of paints of different solids contents.

The incorporation of the proposed paint booth into the Part 70 Operating Permit will require revisions to the equipment description in Section A.2 and to the Girder Shop in the Facility Description Box in Section D.1. Also Conditions D.1.5 and D.1.7 will be added, and existing conditions in Section D.1 and in the Table of Contents will be modified and renumbered. In addition, record keeping for the inspections of the smoke eliminators will be added. Quarterly report forms will be added for VOC usage, PM/PM₁₀ emissions, and to incorporate the proposed booth into the existing single and combination of HAPs limits as follows:

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

Girder Shop

(h) One (1) paint booth, identified as EU#22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and three (3.0) tons of PM/PM₁₀ emissions per twelve (12) consecutive month period.

Grinding

(hi) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 75 square feet of steel per hour 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.

(ij) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 613,200 tons of slabs per year total, limited to 111,116 tons of steel slabs per twelve (12) consecutive month period.

"A" Building

(jk) One (1) paint booth, identified as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausted through Stack #10, capacity: limited to 10,498 gallons of paint and 536 gallons of solvents per twelve (12) consecutive month period.

(kl) One (1) mechanical blaster/blowoff, identified as EU #19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, capacity: 700 linear feet of steel plate per hour.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Girder Shop

- (h) **One (1) paint booth, identified as EU #22, to be installed in 2006, painting large steel bridge girders, exhausting to general ventilation, using no emission control devices, limited to less than forty (40.0) tons of VOC delivered to the applicators per twelve (12) consecutive month period and limited to less than three (3.0) tons of PM and PM₁₀ emissions per twelve (12) consecutive month period.**

Grinding

- (hi) Two (2) plate sweep grinders, identified as part of EU #11, installed in 1990, capacity: 75 square feet of steel per hour 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.
- (ij) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: 613,200 tons of slabs per year total.

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

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

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following requirements:

- (a) The one (1) paint booth, identified as EU #15, shall emit less than two (2.0) tons of PM/PM₁₀ per twelve (12) consecutive month period calculated using the following formula:

$$\text{PM/PM}_{10} \text{ (tpy)} = (\text{gal used/yr}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000\text{lb}) \\ \times (1 - 99\% \text{ transfer and enclosure efficiency}) - (\text{tons paint disposed/yr}) \\ \times (\text{average weight \% solids})$$

Compliance shall be determined at the end of each month. The paint booth EU #15 shall be enclosed in a permanent total enclosure.

- (j) **The one (1) paint booth, identified as EU #22, shall emit less than three (3.0) tons of PM/PM₁₀ per twelve (12) consecutive month period calculated using the following formula:**

$$\text{PM/PM}_{10} \text{ (tpy)} = (\text{gal used/yr}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000\text{lb}) \times (1 - 99\% \text{ transfer and enclosure efficiency})$$

Compliance shall be determined at the end of each month. The paint booth EU #22 shall be enclosed in a permanent total enclosure.

D.1.2 Emission Offset [326 IAC 2-3-2]

- (a) ~~The One~~ (1) paint area, identified as EU #15, ~~will shall emit use~~ less than 19.5 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 structured such that when including the VOC emissions from EU #15, EU #20 and all insignificant sources, the total VOC emissions remain below twenty-five (25) tons per year per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

- (b) **The one (1) paint booth, identified as EU #22, shall use less than forty (40) 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. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.**

D.1.3 Hazardous Air Pollutants (HAP) Limit [326 IAC 2-4.1] (MACT)

- (a) The methyl ethyl ketone (MEK) emissions from EU #15, **EU #20 and EU #22** metal coating operations shall be limited to **a total of less than ten (10) tons per twelve (12) consecutive month period, with compliance determined at the end of each month, ~~rolled monthly, computed on a monthly basis~~** according to the following equation:

$$\text{MEK Emissions (tons)} = \sum_{i=1}^n \frac{[\text{MEK content (lb/gal)}]_i [\text{paint or solvents applied by sprayers (gal)}]_i [1 - O]_i}{2000 \text{ lb/tn}}$$

$$= \frac{\sum_{j=1}^m \frac{[\text{paint disposed (lbs)}]_j \left[\sum_{i=1}^n [\text{MEK content (lb/gal)}]_i [\text{paint or solvent applied by sprayers (gal)}]_i \right]}{[\text{total paint and solvent applied by sprayers (lbs)}]_j \times 2000 \text{ lb/tn}}}{m}$$

where m = the number of months and n = the number of coatings and solvents used, and

O = Equivalent overall efficiency of the capture system and control device as a percentage for EU #20 only as calculated in Condition D.2.3(c), O = 0% for both EU #15 and EU #22

- (b) **The combination of HAPs from EU #15, EU# 20 and EU #22 metal coating operations shall be limited to a total of less than twenty one and five tenths (21.5) tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
- (c) **Compliance with these HAPs limits** ~~All other single HAPs will be shall limit-limited the entire source emissions~~ to less than ten (10) tons **of any single HAP** per year ~~with a limit of and~~ less than twenty-five (25) tons per year for all HAPs. Therefore, 326 IAC 2-4.1(MACT) does not apply.

D.1.4 Particulate Matter (PM) [326 IAC 6.8-1-2]

D.1.5 Particulate Matter (PM) [326 IAC 6.8-1-2]

The particulate matter (PM) emissions from the paint booth, identified as EU #15, and the paint booth, identified as EU #22, shall each not exceed 0.03 grains per dry standard cubic foot.

D.1.56 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 **and EU #22** 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 on days 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):

$$\begin{aligned} c &= n \\ 3 \text{ coating } c \text{ (gal) H VOC content of } c \text{ (lbs/gal, less water)} \\ c &= 1 \\ \hline c &= n \\ 3 \text{ coating } c \text{ (gal)} \\ c &= 1 \end{aligned}$$

D.1.7 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the paint area, identified as EU #15, and the paint booth, identified as EU #22, during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.1.68 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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, EU #17, and EU #21, and EU #22, and any control devices.

Compliance Determination Requirements

D.1.79 Hazardous Air Pollutant Emissions

Compliance with the MEK emission **limits and the combination of HAPs emission limitations** limitation contained in Condition D.1.3 shall be determined pursuant to 40 CFR 63.3941 using formulation data supplied by the coating and solvent manufacturers. IDEM, OAQ reserves the authority to determine compliance using Method 311 in 40 CFR 63 Appendix A. Compliance with Condition D.1.3 shall be demonstrated within 30 days of the end of each quarter based on the total MEK used by the sprayers **and the combination of HAPs** for each of the quarter's three most recent twelve (12) month periods.

D.1.810 Testing Requirements [326 IAC 2-7-6(5)(c)][326 IAC 2-1.1-11]

D.1.911 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 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.

D.1.4012 VOC Emissions

Compliance with Condition D.1.2 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.

D.1.4413 Particulate Matter (PM)

(a) In order to comply with Condition D.1.4, the baghouses for PM control shall be in operation and control emissions from the EU #1, EU #2, EU #18 and EU #21 (blasters #1, #2, #3 and #5) at all times that the blasting processes are in operation.

D.1.4214 Visible Emissions Notations [326 IAC 2-7-6]

D.1.4315 Parametric Monitoring

D.1.4416 Monitoring of Smoke Eliminators

D.1.4517 Broken or Failed Bag Detection

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

D.1.1618 Record Keeping Requirements

- ~~(a) — To document compliance with Conditions D.1.2, D.1.5, and D.1.9, 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.1.2, D.1.5, and D.1.9.~~
- ~~(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 day;~~
 - ~~(5) — The total VOC usage for each day;~~
 - ~~(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.1.3 the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken quarterly and shall be complete and sufficient to establish compliance with the MEK emission limit established in Condition D.1.3.~~
- ~~(1) — The amount of coating and MEK content of each coating material and solvent used. Records shall include usage records, material safety data sheets (MSDS), air quality data sheets, hazardous waste manifests, and product data sheets necessary to verify the type and amount of coating and solvent 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 weight of the coating and solvent mixture disposed each month;~~
 - ~~(4) — The volume of coatings and solvents used each month;~~
 - ~~(5) — The average MEK content of coatings and solvents used each month;~~
 - ~~(6) — The total MEK usage each month; and~~
 - ~~(7) — The weight of MEK emitted each month.~~
- (a) To document compliance with Conditions D.1.2 and D.1.6, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions**

D.1.2 and D.1.6. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) The VOC content of each coating material and solvent used.**
 - (2) The amount of coating material and solvent less water used on daily basis.**
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) The volume weighted VOC content of the coatings used for each day;**
 - (4) The cleanup solvent usage for each month;**
 - (5) The total VOC usage for each day; and**
 - (6) The weight of VOCs emitted for each compliance period.**
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the single HAP and combination of HAPs emission limits established in Condition D.1.3. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.**
- (1) The HAP content of each coating material and solvent used.**
 - (2) The amount of coating material and solvent less water used on monthly basis.**
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.**
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**
 - (3) The single HAP and combination of HAPs usage for each month; and**
 - (4) The weight of the worst case single HAP and combination of HAPs emitted for each compliance period.**
- (c) To document compliance with Condition D.1.4~~2~~14, the Permittee shall maintain records of daily visible emission notations of the four (4) blaster stack exhausts and the two (2) DB torch smoke eliminator exhausts.**
- (d) To document compliance with Condition D.1.4~~3~~15, the Permittee shall maintain a record of the pressure drops once per day during normal operation when venting to the atmosphere.**
- (e) To document compliance with Condition D.1.16, the Permittee shall maintain a record of the inspections once per day while one or more of the DB torches in EU #13 are in operation.**
- (ef) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.1.1719 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) through D.1.1(i) **(j)**, D.1.2 and D.1.3 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 "responsible official" as defined by 326 IAC 2-7-1(34).

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

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
Permit No.: T 089-22406-00161
Facility: One (1) paint booth, EU #22
Parameter: VOC usage including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than 40 tons VOC twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC Emitted (tons)	VOC Emitted (tons)	VOC Emitted (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: _____

Attach a signed certification to complete this report.

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

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
Permit No.: T 089-22406-00161
Facility: One (1) paint booth, EU #22
Parameter: PM/PM₁₀ including coatings, dilution solvents delivered to the applicators, and cleaning solvents
Limit: Less than 3.0 tons PM/PM₁₀ per twelve (12) consecutive month period, with compliance determined at the end of each month.

$$\text{PM/PM}_{10} \text{ (tpm)} = (\text{gal used/mo}) \times (\text{density lb/gal}) \times (\text{weight \% solids}) \times (1 \text{ ton}/2000 \text{ lb}) \times (1 - 99\% \text{ transfer and enclosure efficiency}) - (\text{tons paint disposed/mo}) \times (\text{average weight \% solids})$$

YEAR: _____

Month	PM/PM ₁₀ Emitted (tons)	PM/PM ₁₀ Emitted (tons)	PM/PM ₁₀ Emitted (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: _____

Attach a signed certification to complete this report.

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

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
Permit No.: T089-22406-00161
Facilities: EU #15, **EU #20 and EU #22**, paint booths
Parameter: methyl ethyl ketone (MEK) usage
Limit: **Total** less than 10.0 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report

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

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
Permit No.: T 089-22406-00161
Facilities: EU #15, EU # 20 and EU #22, paint booths
Parameter: Total Combination HAP usage
Limit: Total Combination HAP usage less than 21.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Total Combination HAPs (tons)	Total Combination HAPs (tons)	Total Combination HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Changes to Permit to Incorporate Comments by Industrial Steel Construction, Inc. on the Issued Part 70 Operating Permit

As part of the application received on May 25, 2006, Industrial Steel Construction, Inc. submitted comments on the issued Part 70 Operating Permit. The comments are as follows: The permit language, if changed, has deleted language as ~~strikethroughs~~ and new language **bolded**.

Change 2:

In Condition A.2(c) and in Section D.1(c), the word "year" has been replaced with the phrase "twelve (12) consecutive month period." In Condition A.2(d), the throughput limit had been added and in Section D.1(d), the throughput limit has been changed to 650 tons of rods per year for consistency with Condition D.1.1(d) and the emission calculations in Appendix A to the TSD of the Part 70 Operating Permit.

The phrase "rolled monthly" has been changed to "compliance determined at the end of each month" in Condition A.2(e), Section D.1(e), and the quarterly report forms for VOC usage for EU#20, and the forty-seven (47) torches at EU#13.

In addition, in Section D.1(i) (now Section D.1(k)), the throughput capacity of the two (2) slab grinders has been changed from 613,000 tons of slab per year to 613,200 tons of slab per year to be consistent with Section A.2(i) (now Section A.2(j)) and the TSD of the Part 70 Operating Permit as follows:

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

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19.5 tons of VOC delivered to the applicators per ~~year~~ **twelve (12) consecutive month period** and 2.0 tons of PM/PM₁₀ emissions per twelve (12) consecutive month period, **with compliance determined at the end of each month**.
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, capacity: 2.477 pounds of rods per minute, **limited to 650 tons of rods per twelve (12) consecutive month period**, ~~rolled monthly~~, **with compliance determined at the end of each month**.
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a 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~~ **with compliance determined at the end of each month**.

SECTION D.1

FACILITY OPERATION CONDITIONS

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

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1977, exhausting to general ventilation, limited to less than 19.5 tons of VOC delivered to the applicators per ~~year~~ **twelve (12) consecutive month period** and 2.0 tons of PM/PM₁₀ emissions per twelve (12) consecutive month period, **with compliance determined at the end of each month**.

- (d) Electric arc stick welding, identified as EU #9, installed in 2001, capacity: 2.477 pounds of rods per minute, limited to ~~650 50~~ tons of rods per twelve (12) consecutive month period, ~~rolled monthly~~ **with compliance determined at the end of each month.**
 - (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a 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~~ **with compliance determined at the end of each month.**
- Grinding
- (i) Two (2) slab grinders, identified as part of EU #11, installed in 1991, capacity: ~~643,000~~ **613,200** tons of slabs per year total.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Change 3:

Since Lake County and Gary, Indiana are designated as nonattainment for PM_{2.5} and PM₁₀ is a surrogate for PM_{2.5}, Emission Offset (326 IAC 2-3) is the applicable rule and not 326 IAC 2-2. Therefore, Condition D.1.1 and the Table of Contents have been revised as follows:

D.1.1 Emission Offset Minor Limit ~~[326 IAC 2-2]~~ [326 IAC 2-3]

In order to render the requirements of ~~[326 IAC 2-2]~~ **[326 IAC 2-3]** not applicable, the Permittee shall comply with the following requirements:

D.1 FACILITY OPERATION CONDITIONS – Girder Shop 27

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

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

Change 4:

The source requested that the word “daily” be changed to “each operating day” because the smoke eliminators do not operate a full 8,760 hours per year. In Condition D.1.14 (now D.1.16), rather than changing the word “daily,” the phrase “while one or more of the DB torches in EU #13 are in operation” has been added for clarification to the condition as follows:

D.1.1644 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 **while one or more of the DB torches in EU #13 are in operation.** The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Change 5:

Condition D.4.2(c) and associated Quarterly Report Form have been deleted. This condition from the previous FESOP, which had a throughput limit on the submerged arc welding, is no longer required because the emission factor was incorrectly high. The calculations in Appendix A to the TSD for the

Part 70 Operating Permit show that when the AP-42 emission factor is applied, the potential emissions from the submerged arc welding are only 0.01 tons per year.

Submerged arc welding has been added to Condition D.4.2(a) to ensure that these welding operations comply with the 326 IAC 6.8-1-2 emission standard of 0.03 grains per dry standard cubic foot as follows:

D.4.2 Particulate Matter (PM) [326 IAC 6.8-1-2]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Particulate Limitations), PM/PM₁₀ emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, structural steel and bridge fabrication activities, ~~and hand grinding~~ **and submerged arc welding operation, identified as EU #17**, shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.8-1-2, the particulate matter emissions 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.
- ~~(c) Pursuant to 326 IAC 6.8-1-2, the emissions from the submerged arc welding operation EU #17 shall be limited to less than 0.036 pounds of PM/PM₁₀ per pound of welding wire used with a limit of 18.25 tons of wire per month or 130 tons per twelve (12) consecutive month period, with compliance determined at the end of the month. This condition is necessary in order to limit the PM/PM₁₀ PTE from EU #17 to less than 0.01 tons per year.~~

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

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
 Permit No.: OP 089-22406-00161
 Facilities: Twelve (12) electric arc stick welders, EU #9
 Parameter: Rods
 Limit: Six hundred and fifty (650) tons total per twelve (12) consecutive month period, rolled monthly.

YEAR: _____

Month	Rods (tons)	Rods (tons)	Rods (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: _____

Attach a signed certification to complete this report.

Change 6:

Since the source does not own an open top degreaser, the phrase "4 open parts washers" in Sections A.3(h) and Section D.4(h) has been changed to "4 parts washers" and the capacity of the four (4) open parts washers has been corrected to agree with Section D.4, since the solvent usage of the washers must be less than 145 gallons per twelve (12) months as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

- (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, capacity: 725 gallons per year, total.

SECTION D.4 FACILITY OPERATION CONDITIONS

- (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, capacity: ~~725~~ **72.5** gallons per year, total.

In addition, Condition D.4.4 has been changed to reference 326 IAC 8-3-2, applicable to cold cleaner degreaser operations, since the source only operates cold degreasers and not open top vapor degreasers, and the subsequent conditions have been renumbered as follows:

D.4.4 ~~Organic Solvent Degreasing Operations: Open top vapor degreaser operation [326 IAC 8-3-3] Volatile Organic Compounds (VOC) [326 IAC 8-3-2]~~

The four (4) ~~open~~ parts washers, identified as EU #12, are subject to this rule. The owner or operator of ~~open top vapor~~ **cold cleaner** 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.~~

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;**
- (b) Equip the cleaner with a facility for draining cleaned parts;**
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;**
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;**
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;**
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.**

D.4.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:**
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:**
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));**
 - (B) The solvent is agitated; or**
 - (C) The solvent is heated.**
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for**

applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).**
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.**
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):**
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.**
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.**
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:**
- (1) Close the cover whenever articles are not being handled in the degreaser.**
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.**
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.**

Compliance Determination Requirements

D.4.56 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 2-7-5(3)] [326 IAC 2-7-19]

D.4.67 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.4.78 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Additional OAQ Changes

Upon further review, the OAQ has decided to make the following additional changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 7:

The words "specifically regulated" have been removed from the Source Summary in the Table of Contents, which is consistent with Section D.4, the rule citations [326 IAC 2-7-4(c)] and [326 IAC 2-7-5(15)] have been added to the title of Condition A.3 and a comma has been added after the word "torches" in Condition A.3(j) and Condition D.4.2. In addition, the status of the insignificant activities listed in Condition A.3(a)(4 and 5) and in Section D.4 have been corrected to indicate their installation dates as follows. The rule cites are still applicable to all insignificant activities, not just the specifically regulated insignificant activities.

A	SOURCE SUMMARY	5
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	

A.3 Insignificant Activities [326 IAC 2-7-1(21)] **[326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]**

The 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:
 - (4) 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.
 - (5) 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.
- (j) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(4) 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.

(5) 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.

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

D.4.2 Particulate Matter (PM) [326 IAC 6.8-1-2]

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Particulate Limitations), PM/PM₁₀ 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.

Change 8:

The rule citations [326 IAC 2-7-4(a)(1)(D)] and [IC 13-15-3-6(a)] have been added to the Table of Contents for Condition B.2 and corrected in Condition B.24 (now B.25) so they read the same as they do in the permit as follows:

B GENERAL CONDITIONS9

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] **[326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

B.254 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62-FR ~~8344~~**8314**] [326 IAC 1-1-6]

Change 9:

Condition B.3 (Term of Conditions) and Condition C.12 (Monitoring Methods) have been added to the Part 70 Operating Permit as follows: All subsequent B and C conditions have been renumbered.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

Change 10:

The following changes have been made to Section D.1 in the Table of Contents to make it consistent with the permit. The rule citation [326 IAC 2-7-5(1)], which appeared for Emission Limitations and Standards in Section D.1 has been added in Section D.1. The acronyms (HAP), (PM), and (VOC) have been inserted in Conditions D.1.3, D.1.4, and D.1.5, (now D.1.6). Also, Condition D.1.7 (now D.1.9), Hazardous Air Pollutants Emissions has been moved from under Emissions Limitations and Standards to under Compliance Determination Requirements as follows:

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

D.1.63 Hazardous Air Pollutants **(HAP)** Limit [326 IAC 2-4.1] [MACT]

D.1.74 Particulate Matter **(PM)** [326 IAC 6.8-1-2]

D.1.95 Volatile Organic Compounds **(VOC)** [326 IAC 8-2-9]

~~D.1.7 Hazardous Air Pollutants Emissions~~

Compliance Determination Requirements

D.1.9 Hazardous Air Pollutants Emissions

Change 11:

The rule citation [326 IAC 2-8-4(1)] in Section D.2 for Emission Limitations and Standards has been corrected to [326 IAC 2-7-5(1)].

Emission Limitations and Standards ~~[326 IAC 2-8-4(1)]~~ **[326 IAC 2-7-5(1)]**

Change 12:

The following changes have been made to Section D.2 in the Table of Contents. The rule citation [326 IAC 8-1-2] has been inserted in Condition D.2.1. The words "Minor Limit" have been added in Condition D.2.2. Conditions D.2.3 and D.2.4 have been reordered in the permit to match the Table of Contents. Also, the rule citations [326 IAC 2-7-6(5)(c)] and [326 IAC 2-1.1-11] have been added to Condition D.2.5 as follows:

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

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

D.2.3 Regenerative Thermal Oxidizer

D.2.4 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.2.5 Testing Requirements **[326 IAC 2-7-6(5)(c)] and [326 IAC 2-1.1-11]**

~~D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~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.2.34 Regenerative Thermal Oxidizer~~

(a) The regenerative thermal oxidizer shall operate at all times that the process is in operation.

- (b) When operating the thermal oxidizer to achieve compliance with 326 IAC 8-2-9, and to maintain the pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator to less than 3.5, 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).
- (c) The overall control efficiency of the thermal oxidizer for EU # 20 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Change 13

In Section D.3 of the Table of Contents, the rule citations [326 IAC 6.8-1-2], [326 IAC 2-2], and [326 IAC 2-3] have been added to Condition D.3.1 and the rule citations [326 IAC 2-7-6(5)(c)] and [326 IAC 2-1.1-11] have been added to Condition D.3.4 as follows:

- D.3.1 Particulate Matter (PM) [326 IAC 6-1-2] **[326 IAC 6.8-1-2], [326 IAC 2-2] [326 IAC 2-3]**
D.3.4 Testing Requirements **[326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]**

In addition, the phrase "known as" has been replaced by "identified as" in Conditions D.3.1 and D.3.3 as follows:

D.3.1 Particulate Matter (PM) [326 IAC 6.8-1-2] [326 IAC 2-2] [326 IAC 2-3]

- (a) In order to render the requirements of 326 IAC 2-2 and 326 IAC 2-3 not applicable, emissions from Stack # 9 of the mechanical blaster/blowoff, **identified** ~~known~~ as EU#19, shall not exceed a limit of 1.25 pounds of PM/PM₁₀ per hour. This will limit the PM/PM₁₀ PTE from EU #19 to less than 5.45 tons per year.

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~~ **identified** as EU#19, at all times that the mechanical blaster/blowoff is in operation.

Change 14:

The Gary Department of Environmental Affairs has been removed from Section A since the department does not write Part 70 Operating Permits as follows:

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 eConditions 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 15:

A space has been added between #21 and the word "for" in Condition A.2(g) and in Conditions A.2(j) and (k), the word "known" has been replaced with the word "identified." Also, in Sections D.2 and D.3 the Facility Descriptions have been made consistent with Conditions A.2(j) and (k) as follows:

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

(g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The new blaster would clean scale from steel girders using steel shot.

"A" Building

(j) One (1) paint booth, **identified** ~~known~~ as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausted through Stack #10, capacity: limited to 10,498 gallons of paint and 536 gallons of solvents per twelve (12) consecutive month period.

(k) One (1) mechanical blaster/blowoff, **identified** ~~known~~ as EU #19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, capacity: 700 linear feet of steel plate per hour.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

"A" Building - Paint Booth **identified** ~~known~~ as EU#20

~~Paint Line~~

"A" Building

(j) One (1) paint booth, **identified** ~~known~~ as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausted through Stack #10, capacity: limited to 10,498 gallons of paint and 536 gallons of solvents per twelve (12) consecutive month period.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

"A" Building - Blaster/blowoff, **identified known** as EU#19

- (k) One (1) mechanical blaster/blowoff, **identified known** as EU#19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, capacity: 700 lineal feet 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.)

Change 16:

A parenthesis has been added to Condition B.10(a) (now B.11(a)) as follows:

B.110 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility/emissions unit:

Change 17:

In IDEM's Nonrule Policy Document, a table is presented as an example of how sources can submit their annual compliance certifications. Condition B.9 (now Condition B.10) (Annual Compliance Certification) is being revised to remove "in letter form" so that the condition does not contradict the guidance as follows:

B.100 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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:

Change 18:

In Condition C.4, last sentence has been deleted as follows since 326 IAC 9-1-2 has been incorporated in the SIP and is now federally enforceable:

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. ~~326 IAC 9-1-2 is not federally enforceable.~~

Change 19:

IDEM, OAQ requires that Industrial Steel Construction, Inc. submit its Fugitive Dust Control Plan to the Compliance Data Section. Therefore, Condition C.6 has been revised to the address of where to submit the plan as follows:

C.6 Fugitive Dust Emissions [326 IAC 6.8-10-3]

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, **that shall be** submitted within ninety (90) days of issuance of this permit **to**:

**Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251**

Change 20:

Condition C.17 (now C.18) has changed the starting year for emission statements to 2004 for an emission statement if the actual emissions of volatile organic compounds or oxides of nitrogen are less than twenty five (25) tons per year covering the previous calendar year to agree with the wording in the rule as follows:

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
- (1) starting in **2004** ~~2007~~ and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

Change 21:

In the title of Condition C.18 (now C.19), a space has been added in the third rule citation as follows:

C.19~~8~~ General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

Change 22:

In Condition D.1.1, the words "part of" were added before EU #11 to make the description of the emission unit consistent with the equipment list in Section D.1 as follows:

D.1.1 Emission Offset PSD Minor Limit ~~[326 IAC 2-2]~~ [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following requirements:

- (e) The input of steel plates to the two (2) plate sweep grinders, identified as **part of** EU #11, shall emit less than 0.0925 pounds of PM/PM₁₀ per square foot of plate swept and 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. These conditions are necessary in order to limit the PM/PM₁₀ PTE from the two (2) plate sweep grinders to less than 0.833 tons per year.
- (f) The input of steel slabs to the two (2) slab grinders, identified as **part of** EU #11, shall emit less PM/PM₁₀ than 0.0493 percent of the weight in tons of steel slab ground and shall be limited to 111,116 tons of steel slabs per twelve (12) consecutive month period, with compliance determined at the end of each month. These conditions are necessary in order to limit the PM/PM₁₀ PTE from the two (2) steel slab grinders to less than 54.78 tons per year.

Change 23:

A number sign was omitted in the identification of EU #13 in Condition D.1.4(b). Also, the last sentence of Condition D.1.4(b) has been deleted because the rule that it cites, 326 IAC 6.8-1-2, only states that mineral aggregate plants, which this source is not, are allowed to obtain an exemption from the 0.03 grains per dry cubic standard foot limitation in the rule. The condition has been revised as follows:

D.1.4 Particulate Matter (PM) [326 IAC 6.8-1-2]

- (a) The particulate matter (PM) emissions from each of the four (4) blasters, identified as EU #1, EU #2, EU #18 and EU #21, shall not exceed 0.03 grains per dry standard cubic foot. This requirement shall be satisfied through compliance with Condition D.1.1.
- (b) The particulate matter (PM) emissions from EU #9, EU #11, EU#13 and EU #17, shall not exceed 0.03 grains per dry standard cubic foot. Pursuant to 326 IAC 6.8-1-2 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 the 0.03 grains per dry standard cubic foot requirement.

Change 24:

In Conditions D.1.17 (now D.1.19), D.2.10, and D.4.7, the rule citation has been corrected to read 326 IAC 2-7-1(34) as follows:

D.1.1647 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 (a) through D.1.1(j), D.1.2 and D.1.3 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 "responsible official" as defined by 326 IAC 2-7-1(34).

D.2.10 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 "responsible official" as defined by 326 IAC 2-7-1(34).

D.4.7 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Change 25:

In Condition D.2.2 the permit number is changed to read T 089-22406-00161 as follows:

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

- (a) Pursuant to ~~OP-T~~ 089-22406-00161, the potential to emit VOC from EU #20 shall be limited to less than 1.51 tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month.

Change 26:

In Section D.2, the words "and Reporting" have been added to the subheading Record Keeping Requirements as follows:

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

Change 27:

The source stated that the fan amperage range from the most recent stack test was between 38.7 and 39.6 amps . Therefore, Condition D.2.7(c) is revised and incorporates this range as follows:

D.2.7 Parametric Monitoring

- (c) When for any one reading, the duct pressure or fan amperage is outside the normal range **of between 38.7 and 39.6 amps or** as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances shall be considered a deviation from this permit.

Change 28:

In Section D.3, the subtitle heading Record Keeping and Reporting Requirement, an "s" has been added as follows:

Record Keeping and Reporting Requirements

Change 29:

Condition D.3.8(b) has been renumbered as follows:

D.3.8 Record Keeping Requirements

- (b) To document compliance with Condition D.3.6, the Permittee shall maintain the following:
- (1) Daily records of the pressure drop during normal operation when venting to the atmosphere:
 - (~~3~~2) Documentation of the dates vents are redirected.

Change 30:

On all report forms, the permit number has been corrected as follows:

Permit No.: OPT089-22406-00161

Change 31:

On August 7, 2006, a temporary emergency rule took effect in Indiana, eliminating the 1-hour ozone standard statewide, and redesignating Lake County as attainment for SO₂. Section A.1 of the permit has been revised as follows:

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

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

Responsible Official: Daniel Moore

Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
General Source 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
Nonattainment area for PM_{2.5}
Attainment for CO, PM₁₀, and Lead
~~Primary NonAttainment for SO_x~~
Source Status: Part 70 Permit Program
Minor Source, under PSD, and Major Source under Emission
Offset Rules and Nonattainment NSR

Change 32:

For consistency throughout the entire Part 70 Operating Permit, the "10" in PM₁₀ has been sub-scripted, for example in Condition D.1.1(d) as follows:

D.1.1 Emission Offset PSD Minor Limit ~~[326 IAC 2-2]~~ [326 IAC 2-3]

In order to render the requirements of 326 IAC 2-3 not applicable, the Permittee shall comply with the following requirements:

- (d) The input of rods to the electric arc stick welders, identified as EU #9 shall be limited to 650 tons of rods per twelve (12) consecutive month period, rolled monthly with compliance determined at the end of each month and shall emit less than 18.4 pounds of ~~PM/PM10~~ **PM/PM₁₀** per 1000 pounds of rod. This usage limit is required to limit the potential to emit PM and PM₁₀ from EU #9 to 11.98 tons per year.

Conclusion and Recommendation

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-23141-00161 and Significant Permit Modification 089-23325-00161. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, Indiana 46404
County:	Lake
Operation Permit No.:	T 089-22406-00161
Significant Source Modification No.:	SSM 089-23141-00161
Significant Permit Modification No.:	SPM 089-23325-00161
SIC Code:	3341 and 3349
Permit Reviewer:	Michael A. Morrone

On October 6, 2006, the Office of Air Quality (OAQ) had a notice published in The Post Tribune, Merrillville, Indiana, stating that Industrial Steel Construction, Inc. had applied for a Significant Source Modification and a Significant Permit Modification to a Part 70 Operating Permit to construct a new paint booth, identified as EU #22, with no control devices. The notice also stated that OAQ proposed to issue a Significant Source Modification and a Significant Permit Modification and provided information on how the public could review the proposed Significant Source Modification and Significant Permit Modification 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 Source Modification and Significant Permit Modification to a Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following changes to the Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Change 1:

The titles of the following conditions in the Table of Contents and the actual condition titles have been changed. In addition, the phrase "The owner or operator of cold cleaner degreasers shall:" has been removed from Condition D.4.4 and the letter "O" has been replaced with a degree sign (°) in Condition D.4.5(a)(5) as follows:

- D.1.3 Hazardous Air Pollutants (HAPs) Limit [326 IAC 2-4.1] [MACT]
- D.1.5 Particulate **Matter (PM)** [326 IAC 6.8-1-2]
- D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]
- D.1.9 Hazardous Air **Pollutant** ~~Pollutants~~ Emissions
- D.1.11 Volatile Organic Compounds (VOCs)
- D.2.1 Volatile Organic **Compound** ~~Compounds~~ (VOC) Limitations [326 IAC 8-1-2]
[326 IAC 8-2-9]
- D.2.6 Volatile Organic Compounds (VOCs)
- D.4.4 Volatile Organic Compounds (VOCs)
- D.4.5 Volatile Organic Compounds (VOCs)

D.1.3 Hazardous Air Pollutants (HAPs) Limit [326 IAC 2-4.1] [MACT]

D.1.5 Particulate **Matter (PM)** [326 IAC 6.8-1-2]

D.1.6 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

D.1.9 Hazardous Air **Pollutant** ~~Pollutants~~ Emissions

D.1.11 Volatile Organic Compounds (VOCs)

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

D.2.6 Volatile Organic Compounds (VOCs)

D.4.4 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

The four (4) parts washers, identified as EU #12, are subject to this rule. ~~The owner or operator of cold cleaner degreasers shall:~~ Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

D.4.5 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]

(a)

- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (~~120°F~~**120°F**)):

Change 2:

In Section A, the word "Condition" in the following sentence has been capitalized as follows:

SECTION A

SOURCE SUMMARY

The information describing the source contained in **Conditions** ~~conditions~~ A.1 through A.3 is descriptive information and does not constitute enforceable conditions.

Change 3:

In Condition A.1, the SO_x has been changed to SO₂ as follows:

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

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

Source Location Status: Moderate Nonattainment for Ozone based on the 8-hour standard
Nonattainment area for PM_{2.5}
Attainment for CO, PM₁₀, and Lead
Attainment for ~~SO_x~~ **SO₂**

Change 4:

In Condition D.1.4(b), a space has been inserted between the EU and # in EU#13 as follows:

D.1.4 Particulate Matter (PM) [326 IAC 6.8-1-2]

- (b) The particulate matter (PM) emissions from EU #9, EU #11, **EU #13** ~~EU#13~~ and EU #17, shall not exceed 0.03 grains per dry standard cubic foot.

Change 5:

Since IDEM, OAQ is no longer requiring the source to measure the duct pressure, Condition D.2.7(c) has been revised as follows:

D.2.7 Parametric Monitoring

- (c) When for any one reading, the ~~duct pressure or~~ fan amperage is outside the normal range of between 38.7 and 39.6 amps or as established in most recent compliant stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursion or Exceedances. A reading that is outside the range as established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursion or Exceedances shall be considered a deviation from this permit.

Change 6:

The rule citation of [326 IAC 6-1-2] in Condition D.3.1 of the Table of Contents has been removed as follows because this rule was repealed on August 10, 2005:

D.3.1 Particulate Matter (PM) ~~[326 IAC 6-1-2]~~[326 IAC 6.8-1-2] [326 IAC 2-2] [326 IAC 2-3]

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

**Company Name: Industrial Steel Corporation, Inc.
Address City IN Zip: 86 N. Bridge Street, Gary, IN 46404
Significant Source Mod. No: 089-23141-00161
Significant Permit Mod. No: 089-23325-00161
Reviewer: Michael A. Morrone
Application Date: May 25, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU #22 Paint	7.40	47.3%	0.0%	47.3%	0.0%	0.00%	18.8	1.00	3.50	3.50	65.8	1579	288.2	80.28	n/a	75%

PM Control Efficiency: 99.00%

State Potential Emissions	Add worst case coating to all solvents									Uncontrolled	65.8	1579	288.2	80.3		
										Controlled	65.8	1579	288.2	0.803		

METHODOLOGY

- Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
- Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
- Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
- Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
- Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
- Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
- Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
- Total = Worst Coating + Sum of all solvents used