



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53 IGCN 1003
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: July 5, 2007
RE: AAA Galvanizing of Hamilton / 151-23836-00055
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



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

New Source Review and Minor Source Operating Permit OFFICE OF AIR QUALITY

**AAA Galvanizing of Hamilton, IN Inc.
7825 S. Homestead Drive
Hamilton, Indiana 46742**

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M151-23836-00055	
Original signed by:	Issuance Date: July 5, 2007
Nisha Sizemore, Chief Permits Branch Office of Air Quality	Expiration Date: July 5, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	5
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]	
B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]	
B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.5 Term of Conditions [326 IAC 2-1.1-9.5]	
B.6 Enforceability	
B.7 Severability	
B.8 Property Rights or Exclusive Privilege	
B.9 Duty to Provide Information	
B.10 Certification	
B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.12 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.15 Permit Renewal [326 IAC 2-6.1-7]	
B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.17 Source Modification Requirement	
B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.20 Annual Fee Payment [326 IAC 2-1.1-7]	
B.21 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	10
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.8 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.10 Compliance Monitoring [326 IAC 2-1.1-11]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.12 Instrument Specifications [326 IAC 2-1.1-11]	

Corrective Actions and Response Steps

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 15

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

D.2 EMISSIONS UNIT OPERATION CONDITIONS

Compliance Determination Requirements.....16

D.2.1 Testing Requirements [326 IAC 2-1.1-11]

Annual Notification 17
Malfunction Report 18
Certification Form 20
Affidavit of Construction 21

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary hot-dip galvanization plant.

Source Address:	7825 S. Homestead Drive, Hamilton, Indiana 46742
Mailing Address:	625 Mills Road, Joliet, IL 60433
General Source Phone Number:	(815) 723-5000
SIC Code:	3479
County Location:	Steuben
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired heater, constructed in 2001, rated at 0.2 MMBtu/hr venting to the atmosphere.
- (b) Four (4) natural gas-fired heaters (H1-H4), constructed in 2001, each rated at 1.5 MMBtu/hr venting to the atmosphere.
- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.
- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (f) Four (4) natural gas-fired heaters, permitted to be constructed in 2007, each rated at 1.2 MMBtu/hr venting to the atmosphere.
- (g) Two (2) natural gas-fired generators, permitted to be constructed in 2007, rated at 1.35 MMBtu/hr and 2.0 MMBtu/hr respectively, venting to the atmosphere.
- (h) Six (6) hydrochloric acid tanks, constructed in 2001, and exhausting indoors.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M151-23836-00055, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.5 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.

B.6 Enforceability

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

B.7 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.8 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.9 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.10 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue,
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326 IAC 1-6-2. At a minimum, the PMPs shall include:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M151-23836-00055 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.15 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:

- (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.16 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.18 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air

pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.19 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.20 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.21 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

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

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

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 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.

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

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.8 Performance Testing [326 IAC 3-6]

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.10 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 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.

C.12 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

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

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.

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

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the galvanizing kettle (Kettle 45') shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15.0 tons per hour. The galvanizing kettle (Kettle 23') shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10.0 tons per hour. The pounds per hour limitation is calculated using the following equation:

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

$$E = 4.10 P^{0.67}$$

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

SECTION D.2

EMISSIONS UNITS OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (h) Six (6) hydrochloric acid tanks, constructed in 2001, and exhausting indoors.

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

Compliance Determination Requirements

D.2.1 Testing Requirements [326 IAC 2-1.1-11]

In order to verify the emission factor for HCL, the Permittee shall perform hydrogen chloride (HCl) testing for the hydrochloric acid tank operations utilizing methods as approved by the Commissioner and within one hundred eighty (180) days after issuance of this permit. Testing shall be conducted in accordance with Section C – Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	AAA Galvanizing of Hamilton, IN Inc.
Address:	7825 S. Homestead Drive
City:	Hamilton, Indiana 46742
Phone #:	(815) 723-5000
MSOP #:	M151-23836-00055

I hereby certify that AAA Galvanizing of Hamilton, IN Inc. is : still in operation.

I hereby certify that AAA Galvanizing of Hamilton, IN Inc. is : no longer in operation.
 in compliance with the requirements of MSOP M151-23836-00055.
 not in compliance with the requirements of MSOP M151-23836-00055.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY FAX NUMBER - 317 233-6865

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF MALFUNCTION AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

Source Name: AAA Galvanizing of Hamilton, IN Inc.
Source Address: 7825 S Homestead Drive, Hamilton, IN 46742
MSOP No.: 151-23836-00055

This certification shall be included when submitting any application form, report, compliance monitoring, or other documents as required by the applicable requirements in this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)_____
- Report (specify)_____
- Notification (specify)_____
- Affidavit (specify)_____
- Other (specify)_____

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

Signature:

Printed Name:

Title/Position:

Date:

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue

AAA Galvanizing of Hamilton, IN Inc.
7825 S. Homestead Drive,
Hamilton, IN 46742

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that AAA Galvanizing of Hamilton, IN Inc. 7825 S. Homestead Drive, Hamilton, IN 46742 completed construction of the two (2) kettles and eight (8) acid dip tanks on _____ in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on October 31, 2006 and as permitted pursuant to New Source Construction Permit and Minor Source Operating Permit No. CP- 151-23836-00055, Plant ID No. 151-00055 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____.

My Commission expires:

Signature _____

Name (typed or printed)

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

**Addendum to the Technical Support Document
For a New Source Review and Minor Source Operating Permit (MSOP)**

Source Background and Description

Source Name:	AAA Galvanizing of Hamilton, IN Inc.
Source Location:	7825 S. Homestead Dr., Hamilton, IN 46742
County:	Steuben
SIC Code:	3479
Operation Permit No.:	M151-23836-00055
Permit Reviewer:	ERG/BL

On April 17, 2007, the Office of Air Quality (OAQ) had a notice published in the Herald Republican, Angola, Indiana, stating that AAA Galvanizing of Hamilton, IN Inc. had applied for a New Source Review and Minor Source Operating Permit (MSOP) to continue to operate a hot-dip galvanization plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 5, 2007, a comment was submitted by a member of the public, Mr. Gregory L. Geise. The comment and response to that comment are summarized below. At the request of Mr. Geise a public meeting was held on June 21, 2007 in Angola, Indiana.

Comment 1:

Mr. Geise stated that he personally worked on the building as a sheet metal worker before AAA Galvanizing occupied the building and after AAA Galvanizing began operations in the facility. The scope of the work he was involved in included installing fans, louvers, stacks, and other various sheet metal related items. Mr. Geise stated that, "As far as air pollution systems are concerned, such as baghouses, scrubbers, oxidizers, etc, are nonexistent in the facility. All the different fumes, gases, and other airborne particles created in their process are discharged into the atmosphere by way of various fans. In a very close proximity (1 mile or less) there is Hamilton Jr.-Sr. High School and Grade School (East Southeast of the plant), Fish Creek (to the West), which has some rare aquatic life residing in it, and the Town of Hamilton and Hamilton Lake, which is the third largest natural lake in the state. All of the above could be adversely affected by air pollution if not kept in check." Mr. Geise requested a public hearing be held by IDEM, OAQ.

Response to Comment 1:

Steuben County Attainment Status and the National Ambient Air Quality Standards (NAAQS)
Steuben County is in attainment for all criteria pollutants. This means that the concentration of criteria pollutants in the county's ambient air is lower than the National Ambient Air Quality Standards (NAAQS) set by the United States Environmental Protection Agency (U.S. EPA). The federal Clean Air Act requires the U.S. EPA to set NAAQS for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO₂), particulate matter with a diameter less than 10 micrometers in diameter (PM₁₀), nitrogen oxides (NO_x) and ground level ozone. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for

all criteria pollutants is set low enough to protect human health, including the health of sensitive persons, such as asthmatics, children, and the elderly.

More information about these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. U.S. EPA's <http://www.epa.gov/air/urbanair/6poll.html> site provides more detailed information about the health effects of these six common air pollutants. Information on the health effects of hazardous air pollutants can be found on the EPA's website at <http://yosemite.epa.gov/oswer/ceppoweb.nsf/content/ChemicalsInYourCommunity.htm> on the internet. IDEM describes Indiana's air monitoring system at <http://www.in.gov/idem/programs/air/amb/index.html> on the internet. Information about current and expected air pollution levels is on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

Potential to Emit From the Source

The potential to emit air pollutants for this source is provided in the Technical Support Document for this permit. If this source operated 365 days a year, 24 hours a day, 7 days a week, it could potentially release 33 tons per year of particulate matter (PM), 33.3 tons per year of PM₁₀, 0.04 tons of SO₂, 0.34 tons per year of VOCs, 6.16 tons per year of NO_x, 5.18 tons per year of CO, 4.76 tons per year of a hydrogen chloride (HCl), a hazardous air pollutant (HAP), and 4.90 tons of total HAPs per year. The principal pollutants are PM₁₀ and HCl. HCl emissions from the galvanization plant production are released exclusively from the hydrochloric acid tanks. Acid tank emissions were calculated using a report published by The Metal Finishing Association of Southern California (MFASC) titled *Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry* (April, 1999). The permit requires testing to verify the HCl emission rate from the hydrochloric acid tank operations.

IDEM requires sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board, including the NAAQS. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue an air permit. IDEM has determined that AAA Galvanizing of Hamilton, IN Inc. will be able to comply with all Federal and State air pollution control laws.

IDEM OAQ Inspections and Citizen Complaints

IDEM, OAQ conducts a number of compliance activities associated with permitted sources. These activities include unannounced inspections, surveillance, review of periodic reports submitted by the source, and response to complaints. Inspections of sources are prioritized to ensure compliance with the air pollution control rules. Full inspections of a source include observation of processes, air pollution control equipment and emissions from the plant, review of compliance monitoring by the source, and review of the plant's required records. Inspectors also conduct off-site surveillance of plant emissions to determine if there are any violations of opacity or fugitive dust rules.

Copies of all IDEM inspection reports are available through:

IDEM's Centralized File Room
Indiana Government Center North, Room 1201
100 North Senate Avenue
Indianapolis, IN 46204
Phone: (317) 234-0965 Fax (317) 232-8659

Copies of air pollution warning letters, violations, and referrals to IDEM's Office of Enforcement are available by contacting IDEM, OAQ's Compliance Branch, (317) 233-5676 or toll free at (800) 451-6027, extension 3-5676.

IDEM, OAQ's compliance inspector will respond to any citizen's complaint of visible emissions, fugitive dust, or other air pollution concern regarding the facility by doing a compliance inspection. In every inspection, whether the result of a complaint or not, the IDEM, OAQ compliance inspector will monitor the facility to determine if it is complying with the permit. To file a complaint about any air pollution concern, citizens may use any of the following options:

1. Go to the IDEM's Complaint Clearinghouse web site to file an online complaint at: www.IN.gov/idem/contact/complaints
2. Call the Complaint Coordinator at (800) 451-6027 ext. 24464.
3. Print, complete, and mail a paper-based Complaint Submission Form which can be obtained (in PDF format) at the Complaint Clearinghouse web site at: www.IN.gov/idem/contact/complaints
4. Contact IDEM, OAQ's air pollution inspector for Steuben County directly.

The Complaint Clearinghouse is the central point for receiving and coordinating complaints within IDEM and with other local, state, and federal agencies. The Complaint Clearinghouse staff also establishes agency standards for responding to and tracking complaints to measure agency responsiveness and identify trends or issues as they relate to complaints. If you provided IDEM with your contact information, IDEM will contact you with the findings of the complaint investigation. If you do not provide your contact information, you may call the Complaint Coordinator at (800) 451-6027 ext. 24464.

Anyone observing an air pollution violation at the plant should contact IDEM's Northern Regional Office as follows:

IDEM Northern Regional Office
220 W. Colfax Ave., Suite 200
South Bend, IN 46601-1634
(574) 245-4870 or toll free within Indiana at (800) 753-5519
Fax: (574) 245-4877
Business hours: Monday - Friday 8:15 a.m. to 4:45 p.m. except on scheduled holidays.

If you leave a voice mail message, please state the time you noticed the violation, how long it lasted, a description of the violation and where you were when you noticed it. If you feel comfortable stating your name and telephone number, please also give that information. IDEM, OAQ will investigate your complaint as soon as possible.

Environmental emergencies can be reported to IDEM 24 hours a day at (888) 233-7745.

No changes were made to the permit as a result of this comment.

Public Meeting

On June 21, 2007, a public meeting was held at the Carnegie Public Library, 2nd Floor Conference Room, 322 South Wayne Street, Angola, Indiana. The meeting was attended by IDEM staff, local citizens, and representatives from AAA Galvanizing of Hamilton, IN Inc. Doug Wagner represented IDEM as the meeting officer. Also present from IDEM was Nathan Bell.

No written comments were submitted to IDEM during or following the public meeting.

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

Technical Support Document (TSD) for a New Source Review and Minor Source
Operating Permit (MSOP)

Source Background and Description

Source Name:	AAA Galvanizing of Hamilton, IN Inc.
Source Location:	7825 S. Homestead Dr, Hamilton, IN 46742
County:	Steuben
SIC Code:	3479
Operation Permit No.:	M151-23836-00055
Permit Reviewer:	ERG/BL

The Office of Air Quality (OAQ) has reviewed an application from AAA Galvanizing of Hamilton, IN Inc. relating to the construction and operation of hot-dip galvanization plant.

History

This hot-dip galvanization plant has been operating under a Registration 151-13817-00055 issued March 14, 2001. The original construction included six (6) hydrochloric acid dip tanks. An application to modify the source was received on October 31, 2006. This Permittee has proposed the replacement of kettle S1 with a new kettle (Kettle 45'), the installation of a second kettle (Kettle 23'), and the installation of an additional eight (8) acid dip tanks. The modification increases the source potential to emit PM/PM10 above twenty-five (25) tons per year. Therefore, this source is now being permitted under the provisions of 326 IAC 2-6.1 (Minor Source Operating Permit).

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) natural gas-fired heater, constructed in 2001, rated at 0.2 MMBtu/hr venting to the atmosphere.
- (b) Four (4) natural gas-fired heaters (H1-H4), constructed in 2001, each rated at 1.5 MMBtu/hr venting to the atmosphere.

New Emission Units and Pollution Control Equipment

- (c) One (1) galvanizing kettle (Kettle 45'), permitted to be constructed in 2007, with a maximum process rate of 30,000 lbs/hr, and exhausting to the atmosphere.
- (d) One (1) galvanizing kettle (Kettle 23'), permitted to be constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.
- (e) Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007, and exhausting indoors.
- (f) Four (4) natural gas-fired heaters, permitted to be constructed in 2007, each rated at 1.2 MMBtu/hr venting to the atmosphere.

- (g) Two (2) natural gas-fired generators, permitted to be constructed in 2007, rated at 1.35 MMBtu/hr and 2.0 MMBtu/hr respectively, venting to the atmosphere.

Unpermitted Emission Units and Pollution Control Equipment

- (h) Six (6) hydrochloric acid tanks, constructed in 2001, exhausting indoors.

Existing Approvals

The source has been constructed and operated under the Registration 151-13817-00055, issued on March 14, 2001.

None of the provisions of this permit are being carried over at this time. The requirements of 326 IAC 2-5.5 (Registrations) will no longer be applicable to this source after issuance of this MSOP.

Enforcement Issue

The facilities original registration should have included the six (6) acid dip tanks, installed in 2001.

Stack Summary

There are no process stacks associated with any facilities at this source.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on October 31, 2006, with additional information received on January 10, 2007.

Emission Calculations

See Appendix A of this document for detailed emission calculations in Appendix A, pages 1 through 5.

Potential to Emit of the Source Before Controls

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

Pollutant	Potential to Emit (tons/yr)
PM	33.0
PM-10	33.3
SO ₂	0.04
VOC	0.34
CO	5.18
NO _x	6.16

HAPs	Potential to Emit (tons/yr)
HCl	4.76
Total	4.90

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than 100 tons per year and the potential to emit of PM and PM-10 is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

County Attainment Status

The source is located in Steuben County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

- (a) Steuben County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions. See the State Rule Applicability - Entire Source section.
- (b) Volatile organic compounds (VOC) emissions 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 ozone. Steuben County has been designated as attainment or unclassifiable for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.
- (c) Steuben County has been classified as attainment or unclassifiable in Indiana for PM, PM10, NO₂, SO₂, CO, and Lead. Therefore, these emissions were reviewed pursuant to

the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability - Entire Source section.

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

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions based on U.S. EPA's FIRE 6.25, October 18, 2004 and reference material published by Metal Finishing Association of Southern California (MFASC)):

Pollutant	Emissions (tons/yr)
PM	33.0
PM-10	33.3
SO ₂	0.04
VOC	0.34
CO	5.18
NO _x	6.16
HCl	4.60
Combination HAPs	4.90

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) These emissions were based on calculations contained in Appendix A of this document.

Proposed Modification

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO ₂ (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO _x (ton/yr)
Proposed Modification	22.0	22.3	-	-	-	-
PSD Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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
Combustion	0.12	0.47	0.04	0.34	5.18	6.16	0.12
Kettles	32.9	32.9	-	-	-	-	0.03
Acid Tanks	-	-	-	-	-	-	HCl = 4.76
Total Emissions	33.0	33.3	0.04	0.34	5.18	6.16	Combination = 4.90 HCl = 4.76

"-" = Negligible emissions.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) 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.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 151-23836-00055, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

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

This status is based on all the air approvals issued to the source and the calculations provided in Appendix A.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning, Subpart T (326 IAC 20 and 40 CFR 63.460) because it does not use any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56- 23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Steuben County, is not required to operate under a Part 70 Permit, and does not have the potential to emit greater than or equal to five (5) tons per year of lead. Therefore, this source is subject only to the additional information requests under 326 IAC 2-6-5.

326 IAC 5-1 (Opacity Limitations)

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

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

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

The operation of AAA Galvanizing of Hamilton, IN Inc will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The source is located in Steuben County and was constructed after December 13, 1985. Pursuant to 326 IAC 6-5-1(b), this source is exempt from the requirements of 326 IAC 6-5.

326 IAC 8-1-6 (New facilities; general reduction requirements)

This source does not have potential VOC emissions equal to or greater than twenty five (25) tons per year, therefore this source is not subject to the provisions of 326 IAC 8-1-6.

State Rule Applicability – Galvanizing Kettles

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the allowable particulate emissions from the galvanizing kettle (Kettle 45') shall not exceed 25.2 pounds per hour when operating at a process weight rate of 15.0 tons per hour. The galvanizing kettle (Kettle 23') shall not exceed 19.2 pounds per hour when operating at a process weight rate of 10.0 tons per hour. The pounds per hour limitation was calculated using the following equation:

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

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Emission calculations based on AP-42 factors indicate that each emission unit is able to comply with this limit without using a control device.

State Rule Applicability – Process Heaters

326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating)

The natural gas heaters are not a source of indirect heating. Therefore, this source is not subject to the provisions of 326 IAC 6-2.

326 IAC 6-3 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-3-1(b)(14), 325 IAC 6-3 does not apply to the natural gas heaters because these processes each have a potential to emit of less than five hundred fifty-one thousandths (0.551) pounds per hour of PM.

Testing Requirements

The Metal Finishing Association of Southern California (MFASC) has published a report, *Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry* (April, 1999) that demonstrate the hydrochloric acid tanks potential to emit hydrogen chloride (HCl) emissions are less than HAP major source thresholds. These factors render the requirements of 326 IAC 2-7 (Title V) not applicable.

In order to demonstrate compliance with the applicability criteria under 326 IAC 2-5.1-3(a) the Permittee shall verify the MFASC factors. Within one hundred and eighty (180) days after the issuance of the permit, the Permittee shall perform HCl testing on the hydrochloric acid tank operations using methods approved by the Commissioner. All testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring

No monitoring is required for this type of operation.

Conclusion

The construction and operation of this hot-dip galvanization plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit 151-23836-00055.

**Appendix A: Emission Calculations
Emissions Summary**

Company Name: AAA Galvanizing of Hamilton, IN Inc.
Address: 7825 S. Homestead Dr, Hamilton, IN 46742
Registration: 151-23836-00055
Reviewer: ERG/BL
Date: November 10, 2006

	Potential To Emit (tons/year)							Combined HAPs
	PM	PM-10	SO ₂	VOC	CO	NOx	HCl	
Combustion	0.12	0.47	0.04	0.34	5.18	6.16	-	0.12
Kettles	32.9	32.9	-	-	-	-	-	0.03
Acid Tanks	-	-	-	-	-	-	4.76	4.76
Total	33.0	33.3	0.04	0.34	5.18	6.16	4.76	4.90

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: AAA Galvanizing of Hamilton, IN Inc.
Address: 7825 S. Homestead Dr, Hamilton, IN 46742
Registration: 151-23836-00055
Reviewer: ERG/BL
Date: November 10, 2006

Heat Input Capacity
MMBtu/hr
14.4

Potential Throughput
MMSCF/yr
123.2

	Pollutant					
	PM*	PM10*	SO ₂	NOx	VOC	CO
Emission Factor (lb/MMSCF)	1.90	7.60	0.60	100	5.50	84.0
Potential to Emit (tons/yr)	0.12	0.47	0.04	6.16	0.34	5.18

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM combined.

**Emission factor for NOx (Uncontrolled) = 100 lb/MMSCF

Emission factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July 1998).

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMSCF = 1,000,000 Standard Cubic Feet of Gas

Methodology

Potential Throughput (MMSCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMSCF/1,020 MMBtu

Potential to Emit (tons/yr) = Potential Throughput (MMSCF/yr) x Emission Factor (lb/MMSCF)/2,000 lb/ton

**Appendix A: Emission Calculations
HAPs Emissions from Natural Gas Combustion
MM BTU/HR <100**

Company Name: AAA Galvanizing Inc.
Address: 7825 S Homestead Dr Hamilton IN 46742
Registration: 151-23836-00055
Reviewer: ERG/BL
Date: November 10, 2006

HAPs - Organics

Emission Factor (lb/MMSCF)	Benzene 2.10E-03	Dichlorobenzene 1.20E-03	Formaldehyde 7.50E-02	Hexane 1.80E+00	Toluene 3.40E-03
Potential to Emit (tons/yr)	1.29E-04	7.39E-05	4.62E-03	1.11E-01	2.10E-04

HAPs - Metals

Emission Factor (lb/MMSCF)	Lead 5.00E-04	Cadmium 1.10E-03	Chromium 1.40E-03	Manganese 3.80E-04	Nickel 2.10E-03
Potential to Emit (tons/yr)	3.08E-05	6.78E-05	8.63E-05	2.34E-05	1.29E-04

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Galvanizing Kettle**

Company Name: AAA Galvanizing of Hamilton, IN Inc.
Address: 7825 S. Homestead Dr, Hamilton, IN 46742
Registration: 151-23836-00055
Reviewer: ERG/BL
Date: November 10, 2006

	Maximum Kettle Capacity (lbs/hr)	Maximum Operation (hrs/yr)	Maximum Zinc * Consumption (tons/yr)	Emission Factor (pounds of PM per ton of Zinc consumed)	Emission Factor (pounds of Cadmium per ton of Zinc consumed)	PTE of PM (lb/hr)	PTE of PM (tons/yr)	PTE of Cadmium (tons/yr)	326 IAC 6-3-2 Allowable PM Emissions (lbs/hr)
Kettle 45'	30,000	8,760	7,884	5.00	4.00E-03	4.50	19.7	0.02	25.2
Kettle 23'	20,000	8,760	5,256	5.00	4.00E-03	3.00	13.1	0.01	19.2
Total							32.9	0.03	

* The amount of zinc coating used by the Permittee is 6% of the maximum kiln process weight. The emission factors have been taken from FIRE version 6.25 (SCC 3-04-008-05).

Allowable emissions under 326 IAC 6-3-2 are calculated using the equation where the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$

where

E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

Methodology

Maximum Zinc Consumption (tons/yr) = Maximum Kettle Capacity (lbs/hr) x 8760 hrs/yr x 1 ton/2000 lbs x Zinc coating usage (6%)

Potential to Emit Particulate (lbs/hr) = Maximum Zinc Consumption (tons/yr) x Emission factor (5 lbs/ton of zinc used) x 1 yr/8760 hrs

Potential to Emit Particulate (tons/yr) = Maximum Zinc Consumption (tons/yr) x Emission factor (5 lbs/ton of zinc used) x 1 ton/2000 lbs

