



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: May 10, 2007
RE: Midwest Pipe Coating, Inc. / 089-24010-00096
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



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Midwest Pipe Coating, Inc.
925 Kennedy Avenue
Scherville, Indiana 46375**

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.

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. 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.

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

Operation Permit No.: F089-24010-00096	
Issued by: <i>Original document signed by</i> Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 10, 2007 Expiration Date: May 10, 2012

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	5
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
B. GENERAL CONDITIONS	9
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-8-6]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]	
B.17 Permit Renewal [326 IAC 2-8-3(h)]	
B.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.20 Source Modification Requirement [326 IAC 2-8-11.1]	
B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]	
B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS	18
Emission Limitations and Standards [326 IAC 2-8-4(1)]	
C.1 Overall Source Limit [326 IAC 2-8]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Fugitive Dust Emissions [326 IAC 6.8-10-3]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-8-4(3)]	
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 2-8-4][326 IAC 2-8-5(a)(1)]	
C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]	
C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	

- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

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

- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 25

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

- D.1.1 Particulate Matter (PM) [326 IAC 6.8-1-2]
- D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-3]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

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

- D.1.5 Particulate Matter (PM and PM-10)
- D.1.6 Visible Emissions Notations
- D.1.7 Parametric Monitoring
- D.1.8 Broken or Failed Bag Detection

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

- D.1.9 Record Keeping Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS..... 32

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

- D.2.1 Volatile Organic Compound Limitation [326 IAC 2-8-4] [326 IAC 2-3]
- D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
- D.2.3 HAP Limit [326 IAC 2-8-4]
- D.2.4 Particulate Matter (PM) [326 IAC 6.8-1-2]
- D.2.5 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-3]
- D.2.6 Particulate Matter Overspray [326 IAC 6.8-10-1]
- D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

- D.2.8 Particulate Matter (PM and PM-10)

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

- D.2.9 Monitoring

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

- D.2.10 Record Keeping Requirements
- D.2.11 Reporting Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS..... 31

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Certification Form 34
Emergency Occurrence Form 35
FESOP Quarterly Report Form 37
FESOP Quarterly Report Form 38
FESOP Quarterly Report Form 39
Quarterly Deviation and Compliance Monitoring Report Form 40

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 through A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary metal pipe/bar, abrasive cleaning and coating operation.

Source Address:	925 Kennedy Avenue, Scherverville, Indiana 46375
Mailing Address:	925 Kennedy Avenue, Scherverville, Indiana 46375
General Source Phone Number:	(219) 322-4564
SIC Code:	3479
County Location:	Lake
Source Location Status:	Nonattainment for ozone standard Nonattainment area for SO ₂ standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Not 1 of 28 Source Categories

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

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

- (a) One (1) Thin Film I Line Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film II Line Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (c) One (1) Rebar Line Abrasive Cleaning Machine, constructed in 2000, equipped with storage hopper and airwash separators, all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7 and exhausting at one (1) stack identified as S/V17;
- (d) One (1) I.D. Line Abrasive Cleaning Machine, constructed in 1985, equipped with airwash separator and grit reclaim, all identified as EU30 and rated at 100 pounds virgin grit per hour, with particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20;
- (e) One (1) Thin Film I Line: One (1) Powder Spray Booth, constructed in 1965, equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system, all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2 and exhausting at one (1) stack identified as S/V3;

- (f) One (1) Thin Film II Line: One (1) Powder Spray Booth, constructed in 1984, equipped with powder reclaim and a thirty-two (32) gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE4 and exhausting at one (1) stack identified as S/V6;
- (g) One (1) Rebar Line Powder Spray Booth, constructed in 2005, equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system, all identified as EU28 and rated at 250 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE8 and exhausting at one (1) stack identified as S/V18;
- (h) One (1) Dual Coating Powder Spray Booth, constructed in 1997, equipped with powder reclaim and a twenty four (24) gun electrostatic air atomized spray application system, all identified as EU21 and rated at 750 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE14 and exhausting at one (1) stack identified as S/V7;
- (i) One (1) Thin Film II Line: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour each, identified as EU16, EU17 and EU18, constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.
- (j) Three Liquid Coating Facilities:
 - (1) One (1) I.D. Line Paint Machine, constructed in 1985, rated at 400 pounds liquid paint per hour utilizing a one (1) gun airless spray application system all identified as EU31, with particulate matter over spray controlled by dry filters identified as CE12 and exhausting at one (1) stack identified as S/V22;
 - (2) One (1) O.D. Paint Station, constructed in 1997, rated at 400 pounds liquid paint per hour utilizing a flow coating or a one (1) gun airless spray application system all identified as EU39, and exhausting at one (1) stack identified as S/V30; and
 - (3) One (1) Rebar Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method, and identified as EU40, exhausting at one (1) stack identified as S/V29.

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

This stationary source also includes the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (f) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Refractory storage not requiring air pollution control equipment.
- (i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (j) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (k) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F);

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (1) One (1) 30 gallon cold cleaning parts washer identified as EU41, with a vapor pressure of 2.0 mmHg @ 68 degrees F.
- (l) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (m) Closed loop heating and cooling systems.
- (n) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 20,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (o) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Paved and unpaved roads and parking lots with public access.
- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Emergency gasoline generators not exceeding 110 horsepower.
- (v) Emergency diesel generators not exceeding 1600 horsepower.

- (w) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting ; pneumatic conveying; and woodworking operations.
- (x) Filter or coalescer media change out.
- (y) Thin Film I Line Ink Printer used to mark bar and pipe with identification information.
- (z) Thin Film II Line Ink Printer used to mark pipe with identification information.
- (aa) Pyrolysis cleaning furnace, identified as EU25, used to remove coating from steel parts by heating and vaporizing.
- (bb) Thin Film II Line Rinse Station spraying a water/phosphoric acid mixture onto steel pipe.
- (cc) Thin Film I Line Blowout Station used to remove residual steel abrasive from the inside of steel pipe.
- (dd) Thin Film II Line Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;
- (ee) I.D. paint station applying a rust preventive coating onto pipe ends.
- (ff) Quality control lab located in the main office.
- (gg) Rebar fume hood exhausting fume at the exist side of the Rebar spray booth to the atmosphere.
- (hh) Thin Film Line fume hood exhausting fume at the exist side of the Thin Film Line spray booth to the atmosphere.
- (ii) Dowel bar dip tank coating steel bars with a corrosion preventive compound.

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

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, F089-24010-00096, 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.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.

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

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.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (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.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This

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

- (b) One (1) certification shall be included, 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.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

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

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (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.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

and

Northwest Regional Office
8315 Virginia St., Ste. 1
Merrillville, Indiana 46410

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F089-24010-00096 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 2-8-9][326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

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

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

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by 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 nine (9) months 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 2-8 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.18 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

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

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][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 FESOP 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.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][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. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [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 2-8-4(1)]

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

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

- (a) Pursuant to 326 IAC 2-8:
- (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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.

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

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

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

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on September 26, 2001.

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 2-8-4(3)]

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

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 2-8-4][326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification 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).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision 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] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (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 pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4][326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate 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 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) 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).
- (e) 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.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Thin Film I Line Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film II Line Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (c) One (1) Rebar Line Abrasive Cleaning Machine, constructed in 2000, equipped with storage hopper and airwash separators, all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7 and exhausting at one (1) stack identified as S/V17;
- (d) One (1) I.D. Line Abrasive Cleaning Machine, constructed in 1985, equipped with airwash separator and grit reclaim, all identified as EU30 and rated at 100 pounds virgin grit per hour, with particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20;

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

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

D.1.1 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (Particulate Emission Limitations), the particulate matter emissions from the processes controlled by baghouses shall each be limited to 0.03 gr/ dscf. This is equivalent to particulate allowable emission rates of the following:

Process/Facility	Exhaust Flow Rate (dscfm)	Allowable PM Emission Rate (lb/hr)
EU5	3,600	0.92
EU14	6,623	1.70
EU27	6,817	1.75
EU30	5,649	1.45

D.1.2 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from baghouse CE15 and CE13 controlling EU5 and EU14, respectively, shall each not exceed 2.35 pounds per hour.
- (b) the PM-10 emissions from dust collector CE-7 controlling EU27, shall not exceed 0.73 pounds per hour.
- (c) the PM-10 emissions from baghouse CE-10 controlling EU30, shall not exceed 4.25 pounds per hour.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a) (1), (4)] [326 IAC 2-1.1-11]

The Permittee shall perform PM and PM-10 testing by November 5, 2010 on the I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim, all identified as EU30, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the most recent compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

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

D.1.5 Particulate Matter (PM and PM-10)

- (a) In order to comply with D.1.1 and D.1.2, the baghouses and dust collectors for PM and PM-10 control shall be in operation at all times when the EU5, EU14, EU27 and EU 30 are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the EU5, EU14, EU27, and EU30 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) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the dust collector or a baghouse used in conjunction with EU5, EU14, and EU30, and the dust collector used in conjunction with EU27 at least once per day when the process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse and dust collector is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range 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.
- (b) 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.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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 unit has 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 baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain once per day records of visible emission notations of the EU5, EU14, EU27 and EU30 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain once per day records of the pressure drop across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this Permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (e) One (1) Thin Film I Line Powder Spray Booth, constructed in 1965, equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system, all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2 and exhausting at one (1) stack identified as S/V3;
- (f) One (1) Thin Film II Line: One (1) Powder Spray Booth, constructed in 1984, equipped with powder reclaim and a thirty-two (32) gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE4 and exhausting at one (1) stack identified as S/V6;
- (g) One (1) Rebar Line Powder Spray Booth, constructed in 2005, equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system, all identified as EU28 and rated at 250 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE8 and exhausting at one (1) stack identified as S/V18;
- (h) One (1) Dual Coating Powder Spray Booth, constructed in 1997, equipped with powder reclaim and a twenty four (24) gun electrostatic air atomized spray application system, all identified as EU21 and rated at 750 pounds of virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE14 and exhausting at one (1) stack identified as S/V7;
- (i) One (1) Thin Film II Line: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour, identified as EU16, EU17 and EU18, constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.
- (j) Three Liquid Coating Facilities:
 - (1) One (1) I.D. Line Paint Machine, constructed in 1985, rated at 400 pounds liquid paint per hour utilizing a one (1) gun airless spray application system, all identified as EU31, with particulate matter over spray controlled by dry filters identified as CE12 and exhausting at one (1) stack identified as S/V22;
 - (2) One (1) O.D. Paint Station, constructed in 1997, rated at 400 pounds liquid paint per hour utilizing a flow coating or a one (1) gun airless spray application system all identified as EU39, and exhausting at one (1) stack identified as S/V30; and
 - (3) One (1) Rebar Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method, and identified as EU40, exhausting at one (1) stack identified as S/V29.

Insignificant Activities:

- (aa) Pyrolysis cleaning furnace, identified as EU25, used to remove coating from steel parts by heating and vaporizing.
- (dd) Thin Film II Line Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;

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

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

D.2.1 Volatile Organic Compound Limitation [326 IAC 2-8-4] [326 IAC 2-3]

The three (3) paint booths (EU31, EU39 and EU40) shall use less than 23.49 tons of VOC, including coatings, dilution solvents, and cleaning solvents per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the source's potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit renders the 326 IAC 2-7 and 326 IAC 2-3 requirements not applicable.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to metal pipe in EU31 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air (less than 90EC or 194 EF) dried coatings.

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

D.2.3 Hazardous Air Pollutants Limit [326 IAC 2-8-4]

- (a) The three paint booths (EU31, EU39 and EU40) single HAP usage including dilution and clean-up solvents shall be limited to 9 tons per 12 consecutive month period with compliance determined at the end of each month. The HAPs usage limitations, in conjunction with the potential to emit of HAPs from other emission units, shall limit the single HAP emissions from the entire source to less than 10 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 not applicable.
- (b) The three paint booths (EU31, EU39 and EU40) combined HAPs usage including dilution and clean-up solvents shall be limited to 23.97 tons per 12 consecutive month period with compliance determined at the end of each month. The HAPs usage limitations, in conjunction with the potential to emit of HAPs from other emission units, shall limit the combined HAP emissions from the entire source to less than 25 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-7 not applicable.

D.2.4 Particulate Matter (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (Particulate Emission Limitations), the particulate matter emissions from the processes listed in the table below shall each be limited to 0.03 gr/ dscf. This is equivalent to particulate allowable emission rates of the following:

Process/Facility	Exhaust Flow Rate (dscfm)	Allowable PM Emission Rate (lb/hr)
EU7	2,532	0.65
EU19	5,843	1.50
EU21	8,905	2.29
EU28	1,677	0.43
EU15	4,188	1.08
EU25	59	0.013

D.2.5 Particulate Matter Less Than Ten Microns (PM-10) [326 IAC 2-8-4] [326 IAC 2-3]

Pursuant to 326 IAC 2-8 (FESOP):

- (a) the PM-10 emissions from dry filters CE-2 controlling EU7, shall not exceed 0.15 pounds per hour.
- (b) the PM-10 emissions from dry filters CE-4 controlling EU19, shall not exceed 1.32 pounds per hour.
- (c) the PM-10 emissions from dry filters CE-14 controlling EU21, shall not exceed 0.44 pounds per hour.
- (d) the PM-10 emissions from baghouse CE-8 controlling EU28, shall not exceed 0.29 pounds per hour.
- (e) the PM-10 emissions from baghouse CE-3 controlling EU15, shall not exceed 0.15 pounds per hour.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.

D.2.6 Particulate Matter Overspray [326 IAC 6.8-10-1]

Pursuant to 326 IAC 6.8-10-1 (Fugitive Particulate Matter Emission Limits in Lake County), the particulate matter overspray from EU39 shall be limited to a zero percent frequency of visible emission observations from a building enclosing all or part of the coating operation, and 10 percent opacity when operating otherwise.

D.2.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

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

Compliance Determination Requirements

D.2.8 Particulate Matter (PM and PM-10)

In order to comply with D.2.4, D.2.5 and D.2.6, the dry filters for PM and PM-10 control shall be in operation at all times when the spray booths are in operation.

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

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S/V 22 and S/V 30 while one or more of the booths are in operation. If a condition exists which should result in response steps, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the particulate emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.2.1 - D.2.3.
- (1) The amount of VOC and HAP 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 and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAP emitted for each compliance period.
- (b) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.3 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 require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

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

One (1) 30 gallon cold cleaning parts washer identified as EU41 in the building 1 maintenance shop, exhausting to stack S/V27.

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

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

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator 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.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment 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^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (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 Permittee 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.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
IDEM Northwest Regional Office**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Midwest Pipe Coating, Inc.
Source Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
Mailing Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
FESOP Permit No.: F089-24010-00096

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**and
IDEM Northwest Regional Office**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Midwest Pipe Coating, Inc.
Source Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
Mailing Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
FESOP Permit No.: F089-24010-00096

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16 |
|---|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Midwest Pipe Coating, Inc.
Source Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
Mailing Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
FESOP Permit No.: F089-24010-00096
Facility: Three (3) paint booths EU31, EU39, and EU40
Parameter: VOC
Limit: VOC usage of less than 23.49 tons of VOC, including coating, dilution solvents, and cleaning solvents per 12 consecutive period.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Midwest Pipe Coating, Inc.
Source Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
Mailing Address: 925 Kennedy Avenue, Scherverville, Indiana 46375
FESOP Permit No.: F089-24010-00096
Facility: Three (3) paint booths EU31, EU39, and EU40
Parameter: HAPs
Limit: Usage of 9 tons per month of any single HAP including coatings, dilution solvents, and cleaning solvents.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Midwest Pipe Coating, Inc.
 Source Address: 925 Kennedy Avenue, Schererville, Indiana 46375
 Mailing Address: 925 Kennedy Avenue, Schererville, Indiana 46375
 FESOP Permit No.: F089-24010-00096
 Facility: Three (3) paint booths EU31, EU39, and EU40
 Parameter: HAPs
 Limit: Usage of 23.97 tons per month of total HAPs including coatings, dilution solvents, and cleaning solvents.

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Midwest Pipe Coating, Inc.
 Source Address: 925 Kennedy Avenue, Schererville, Indiana 46375
 Mailing Address: 925 Kennedy Avenue, Schererville, Indiana 46375
 FESOP Permit No.: F089-24010-00096

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit
(FESOP) Renewal

**Midwest Pipe Coating, Inc.
925 Kennedy Avenue
Scherville, Indiana 46375**

F089-24010-00096

On January 19, 2007 and January 23, 2007, the Office of Air Quality (OAQ) had a notice published in The Times, Munster, Indiana 46321, and The Post Tribune, Merrillville, Indiana 46410, stating that Midwest Pipe Coating, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a stationary metal pipe/bar, abrasive cleaning and coating operation. 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.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

1. IDEM has made a change related to the Authorized Individual (A.I.). IDEM will no longer be listing the name or title of the A.I. in the permit. Therefore, the Authorized Individual name and title was deleted from this permit.

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

The Permittee owns and operates a stationary metal pipe/bar, abrasive cleaning and coating operation.

~~Authorized Individual: _____ Joel Chermak, General Manager~~

2. IDEM has revised the title of Section C.12 from Pressure Gauge and Other Instrument Specifications to Instrument Specifications. Therefore, the words "Pressure Gauge and Other" in Condition D.1.7(b) was deleted to correspond to the title in Condition C.12 .

D.1.7 Parametric Monitoring

- (b) The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other~~ Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
3. IDEM has made some changes to record keeping of the Parametric Monitoring in order to clarify the requirements. IDEM also has decided that the phrase "during normal operation when venting to the atmosphere" should be deleted. Therefore, the following changes were made in Condition D.1.9 as follows:

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain once per day records of visible emission notations of the EU5, EU14, EU27 and EU30 stack exhausts. **The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (i.e. the process did not operate that day).**
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain once per day records of the pressure drop ~~during normal operation when venting to the atmosphere.~~ **across the baghouse controlling the process. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (i.e. the process did not operate that day).**

On February 9, 2007 a Midwest Pipe Coating, Inc. representative submitted comments on the proposed FESOP renewal. Following is the summary of comments and responses. Text with a line through it has been deleted and bold text has been added.

Comment No. 1: The Rebar Spray Booth (EU28) was reconstructed in 2005 after an arson fire.

Response No. 1: The date of construction was changed to 2005 in Condition A.2, Emission Units and Pollution Control Equipment summary and in Condition D.2 Facility Description as follows:

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

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

- (g) One (1) Rebar Line Powder Spray Booth, constructed in ~~1984~~ **2005**, equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system, all identified as EU28 and rated at 250 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE8 and exhausting at one (1) stack identified as S/V18;

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (g) One (1) Rebar Line Powder Spray Booth, constructed in ~~1984~~ **2005**, equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system, all identified as EU28 and rated at 250 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE8 and exhausting at one (1) stack identified as S/V18;

Comment No. 2: Condition C.6, part of the Fugitive Dust Control Plan condition was missing.

Response No. 2: The Fugitive Dust Control Plan was submitted on September 26, 2001. Therefore, the submitted date of September 26, 2001 was added to the condition.

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, submitted on **September 26, 2001**.

Comment No. 3: EU5 and EU14 utilize dust collectors, not baghouses, so the wording should be changed in Condition D.1.7(a) accordingly.

Response No. 3: The word "baghouse" was replaced by "dust collector" in Section A.2, and Section D.1. The dust collector was added to Condition D.1.7(a) as requested.

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

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

- (a) One (1) Thin Film Line I Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a ~~baghouse~~ **dust collector** identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film Line II Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a ~~baghouse~~ **dust collector** identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (c) One (1) Rebar Line Abrasive Cleaning Machine, constructed in 2000, equipped with storage hopper and airwash separators, all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7 and exhausting at one (1) stack identified as S/V17;

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) Thin Film Line I Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a ~~baghouse~~ **dust collector** identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film Line II Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a ~~baghouse~~ **dust collector** identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (c) One (1) Rebar Line Abrasive Cleaning Machine, constructed in 2000, equipped with storage hopper and airwash separators, all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7 and exhausting at one (1) stack identified as S/V17;

D.1.7 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the **dust collector or a baghouse** used in conjunction with EU5, EU14, and EU30, and the dust collector used in conjunction with EU27 at least once per day when the process is in operation when venting to the atmosphere.

Comment No. 4: On page 30 of 41 of permit F089-24010-00096, the sentence in section D.2.9 (b) should read ".....stack S/V while the booth is in operation."

Response No. 4: Upon further review, IDEM, OAQ has determined that there are more than one stack to be monitored. The EU39 Paint Station operation uses a flow coating or a gun airless spray application system. The particulate monitoring is required when using a gun airless spray application system. Therefore, stack S/V 30 will be added to Condition D.2.9 (a).

D.2.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks S/V 22 **and S/V 30** while one or more of the booths are in operation. If a condition exists which should result in response steps, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Comment No. 5: The comment states "We once again request that the requirements in section D.2.9 (b) on page 30 be more lenient than a once-a-month rooftop inspection, since there is no easy access to the roof of building #4, where that stack (S/V22) is located." (During the telephone discussion, the company representative indicated that they wanted to monitor once every six month period or once per year, not once-a-month as indicated in the written comment.)

Response No. 5: IDEM has re-evaluated the situation and concluded that in order to ensure that there is no presence of overspray on the roof top, the monitoring should be at least once per month. Therefore, no change has been made to this monitoring condition.

Comment No. 6: It appears that parts of section D.2.9 and/or D.2.10 are missing between pages 30 and 31.

Response No. 6: The hard copy mailed to the company was missing the top part of the record keeping requirements. However, the electronic draft that was on IDEM's website was complete. Therefore, no change will be made in this final permit.

Comment No. 7: The word "Quarterly" in Table of Contents, "Pollutants" and "Oil and Grease" in Conditions A.3 & D.2, were misspelled and the word "grinding" in Condition A.3 was not capitalized.

Response No. 7: There were typographical errors in the Quarterly Report Form, Conditions A.3 and D.2. The following typographical errors were corrected in the Table of Contents, Conditions A.3 and D.2 of the permit.

FESOP Quarterly Report Form	37
FESOP Quarterly Report Form	38
FESOP Quarterly Report Form	39

- (o) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (w) ~~g~~Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting ; pneumatic conveying; and woodworking operations.

D.2.3 Hazardous Air ~~Pollutnats~~ **Pollutants** Limit [326 IAC 2-8-4]

Comment No. 8: The descriptions of the facilities should read "Thin Film I Line" and "Thin Film II Line" not "Thin Film Line I" and "Thin Film Line II".

Response No. 8: The descriptions in Section A.2, A.3, D.1 and D.2 of the permit were changed as follows:

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

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

- (a) One (1) Thin Film ~~I~~ Line ~~+~~ Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE15 and exhausting at one (1) stack identified as S/V10;

- (b) One (1) Thin Film II Line # Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (e) One (1) Thin Film I Line-I: One (1) Powder Spray Booth, constructed in 1965, equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system, all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2 and exhausting at one (1) stack identified as S/V3;
- (f) One (1) Thin Film II Line-II: One (1) Powder Spray Booth, constructed in 1984, equipped with powder reclaim and a thirty-two (32) gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE4 and exhausting at one (1) stack identified as S/V6;
- (i) One (1) Thin Film II Line-II: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour each, identified as EU16, EU17 and EU18, constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.

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

This stationary source also includes the following insignificant activities:

- (y) Thin Film I Line-I Ink Printer used to mark bar and pipe with identification information.
- (z) Thin Film II Line-II Ink Printer used to mark pipe with identification information.
- (bb) Thin Film II Line-II Rinse Station spraying a water/phosphoric acid mixture onto steel pipe.
- (cc) Thin Film I Line-I Blowout Station used to remove residual steel abrasive from the inside of steel pipe.
- (dd) Thin Film II Line-II Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) One (1) Thin Film I Line-I Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film II Line-II Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a dust collector identified as CE13 and exhausting at one (1) stack identified as S/V9;

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (e) One (1) Thin Film I Line-I Powder Spray Booth, constructed in 1965, equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system, all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2 and exhausting at one (1) stack identified as S/V3;
- (f) One (1) Thin Film II Line-II: One (1) Powder Spray Booth, constructed in 1984, equipped with powder reclaim and a thirty-two (32) gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE4 and exhausting at one (1) stack identified as S/V6;
- (i) One (1) Thin Film II Line-II: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour, identified as EU16, EU17 and EU18, constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.

Insignificant Activities:

- (dd) Thin Film II Line-II Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;

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

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Midwest Pipe Coating, Inc.
Source Location:	925 Kennedy Avenue, Schererville, IN 46375
County:	Lake
SIC Code:	3479
Operation Permit No.:	F089-14137-00096
Operation Permit Issuance Date:	August 29, 2002
Permit Renewal No.:	F089-24010-00096
Permit Reviewer:	Lek R. Traivaranon

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Midwest Pipe Coating, Inc. relating to the operation of a stationary metal pipe/bar, abrasive cleaning and coating operation.

Permitted Emission Units and Pollution Control Equipment

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

- (a) One (1) Thin Film Line I Abrasive Cleaning Machine, constructed in 1966, equipped with storage hopper and airwash separators, all identified as EU5 and rated at 40 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE15 and exhausting at one (1) stack identified as S/V10;
- (b) One (1) Thin Film Line II Abrasive Cleaning Machine, constructed in 1978, equipped with storage hopper and airwash separators, all identified as EU14 and rated at 200 pounds virgin grit per hour, with particulate matter controlled by a baghouse identified as CE13 and exhausting at one (1) stack identified as S/V9;
- (c) One (1) Rebar Line Abrasive Cleaning Machine, constructed in 2000, equipped with storage hopper and airwash separators, all identified as EU27 and rated at 80 pounds virgin grit per hour, with particulate matter controlled by cartridge dust collector identified as CE7 and exhausting at one (1) stack identified as S/V17;
- (d) One (1) I.D. Line Abrasive Cleaning Machine, constructed in 1985, equipped with airwash separator and grit reclaim, all identified as EU30 and rated at 100 pounds virgin grit per hour, with particulate matter at the airwash separator controlled by a baghouse identified as CE10 and exhausting at one (1) stack identified as S/V20;
- (e) One (1) Thin Film Line I: One (1) Powder Spray Booth, constructed in 1965, equipped with powder reclaim and a sixteen (16) gun electrostatic air atomized spray application system, all identified as EU7 and rated at 110 pounds virgin powder per hour, with particulate matter controlled by dry filters identified as CE2 and exhausting at one (1) stack identified as S/V3;
- (f) One (1) Thin Film Line II: One (1) Powder Spray Booth, constructed in 1984, equipped with powder reclaim and a thirty-two (32) gun electrostatic air atomized spray application system, identified as EU19 and rated at 750 pounds virgin powder per hour, with

- particulate matter controlled by dry filters identified as CE4 and exhausting at one (1) stack identified as S/V6;
- (g) One (1) Rebar Line Powder Spray Booth, constructed in 1981, equipped with powder reclaim system and an eighteen (18) gun electrostatic air atomized spray application system, all identified as EU28 and rated at 250 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE8 and exhausting at one (1) stack identified as S/V18;
 - (h) One (1) Dual Coating Powder Spray Booth, constructed in 1997, equipped with powder reclaim and a twenty four (24) gun electrostatic air atomized spray application system, all identified as EU21 and rated at 750 pounds virgin powder per hour, with particulate matter at the spray booth controlled by dry filters identified as CE14 and exhausting at one (1) stack identified as S/V7;
 - (i) One (1) Thin Film Line II: Three (3) natural gas direct fired process ovens, each rated at 12.8 million (MM) British thermal units (Btu) per hour, identified as EU16, EU17 and EU18, constructed in 1984, 1984, and 1988, respectively, and exhausting at one (1) stack identified as S/V5.
 - (j) Three Liquid Coating Facilities:
 - (1) One (1) I.D. Line Paint Machine, constructed in 1985, rated at 400 pounds liquid paint per hour utilizing a one (1) gun airless spray application system, all identified as EU31, with particulate matter over spray controlled by dry filters identified as CE12 and exhausting at one (1) stack identified as S/V22;
 - (2) One (1) O.D. Paint Station, constructed in 1997, rated at 400 pounds liquid paint per hour utilizing a flow coating or a one (1) gun airless spray application system all identified as EU39, and exhausting at one (1) stack identified as S/V30; and
 - (3) One (1) Rebar Line Patch Station rated at 8 pounds patching compound per hour utilizing a brush application method, and identified as EU40, exhausting at one (1) stack identified as S/V29.

Insignificant Activities

The source also consists of 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) Btu per hour.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (e) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

- (f) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (g) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Refractory storage not requiring air pollution control equipment.
- (i) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (j) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (k) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psi measured at 20 degrees C (68 degrees F);The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
 - (1) One (1) 30 gallon cold cleaning parts washer identified as EU41, with a vapor pressure of 2.0 mmHg @ 68 degrees F.
- (l) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (m) Closed loop heating and cooling systems.
- (n) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 20,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (o) Activities associated with the treatment of wastewater streams with an oil an grease content less than or equal to 1% by volume.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Heat exchanger cleaning and repair.
- (r) Paved and unpaved roads and parking lots with public access.
- (s) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (t) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (u) Emergency gasoline generators not exceeding 110 horsepower.

- (v) Emergency diesel generators not exceeding 1600 horsepower.
- (w) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting ; pneumatic conveying; and woodworking operations.
- (x) Filter or coalescer media change out.
- (y) Thin Film Line I Ink Printer used to mark bar and pipe with identification information.
- (z) Thin Film Line II Ink Printer used to mark pipe with identification information.
- (aa) Pyrolysis cleaning furnace, identified as EU25, used to remove coating from steel parts by heating and vaporizing.
- (bb) Thin Film Line II Rinse Station spraying a water/phosphoric acid mixture onto steel pipe.
- (cc) Thin Film Line I Blowout Station used to remove residual steel abrasive from the inside of steel pipe.
- (dd) Thin Film Line II Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4;
- (ee) I.D. paint station applying a rust preventive coating onto pipe ends.
- (ff) Quality control lab located in the main office.
- (gg) Rebar fume hood exhausting fume at the exist side of the Rebar spray booth to the atmosphere.
- (hh) Thin Film Line fume hood exhausting fume at the exist side of the Thin Film Line spray booth to the atmosphere.
- (ii) Dowel bar dip tank coating steel bars with a corrosion preventive compound.

Existing Approvals

The source has been operating under the previous FESOP 089- 14137-00096, issued on August 29, 2002 with an expiration date of August 29, 2007, and the following:

- (1) First Administrative Amendment, AA089-16022-00096, issued September 19, 2002.
- (2) Second Administrative Amendment, AA089-17180-00096, issued June 9, 2003.
- (3) Third Administrative Amendment, AA089-19073-00096, issued January 20, 2005.
- (4) Fourth Administrative Amendment, AA089-20075-00096, issued February 10, 2005.

All conditions from previous approvals were incorporated into this permit, except the following:

- (1) The item (g) in AA 089-17180-00096 was deleted because the following facilities were removed from source per a renewal application submitted Nov 29, 2006.

- One (1) Custom I Line Powder Spray Booth, constructed in 1986, equipped with powder reclaim and an eighteen (18) gun electrostatic air atomized spray application system all identified as EU23.
- (2) The Particulate Emission Limitations requirements of 326 IAC 6 were removed from this permit because the provisions were repealed and re-codified. The source is subject to 326 IAC 6.8 requirements.
 - (3) The following insignificant activities were added to Section D.2 Facility Description, but the requirements have not been changed as a result of the addition.
 - (aa) Pyrolysis cleaning furnace, identified as EU25, used to remove coating from steel parts by heating and vaporizing.
 - (bb) Thin Film Line II Blowout Station used to remove residual steel abrasive from the inside of steel pipe identified as EU15, with particulate matter controlled by a baghouse identified as CE3, and exhausting at one (1) stack identified as S/V4.
 - (4) The PM-10 emissions from baghouse CE-10 controlling EU30 limit was corrected for the typo--from 3.25 lb/hr to 4.25 lb/hr, but the annual limit is still 18.6 tons per year.
 - (5) EU30 was removed from Condition D.2.2, Volatile Organic Compound (VOC) [326 IAC 8-2-9] emissions requirements because the EU30 unit is a Line Abrasive Cleaning Machine, it does not coat the metal pipes and it does not emit VOC.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP renewal 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 submitted November 29, 2006 by the applicant.

Emission Calculations

See Appendix A of this document for detailed emission calculations (Pages 1 through 15)

Unrestricted Potential Emissions

This table reflected the unrestricted potential emissions of the source, excluding emission limits that were contained in the previous FESOP.

Pollutant	Potential to Emit (tons/yr)
PM	1,828.89
PM-10	1,809.51
SO ₂	0.11
VOC	619.35
CO	14.13
NO _x	16.94

HAPs	Potential to Emit (tons/yr)
Chromium Compound	< 10
Xylene	> 10
Toluene	< 10
MEK	< 10
Glycol Ethers	< 10
Nickel Compound	<10
Ethyl benzene	> 10
Total	> 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 and VOC is equal to or greater than 100 and 25 tons per year, respectively, therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of a single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. A FESOP will be issued because the source will limit its emissions below the Title V levels.

and

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

Potential to Emit After Issuance

The source has opted to remain a FESOP source. 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 FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP and additional information submitted in the renewal application dated November 29, 2006.

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Thin Film Line I Abrasive Cleaning Machine (EU5) ⁽¹⁾	0.16	0.16	-	-	-	-	-	-
Thin Film Line II Abrasive Cleaning Machine (EU14) ⁽¹⁾	0.16	0.16	-	-	-	-	-	-
Rebar Line Abrasive Cleaning Machine (EU27) ⁽¹⁾	0.05	0.05	-	-	-	-	-	-
I.D. Line Abrasive Cleaning Machine(EU30) ⁽¹⁾	0.63	0.63	-	-	-	-	-	-
Thin Film Line I Powder Spray Booth (EU7) ⁽¹⁾	0.01	0.01	-	-	-	-	-	-
Thin Film Line II: One (1) Powder Spray Booth (EU19) ⁽¹⁾	0.09	0.09	-	-	-	-	-	-
Thin Film Line II: One (1) Powder Spray Booth (EU21) ⁽¹⁾	0.03	0.03	-	-	-	-	-	-
Thin Film Line II: Blow Out Station (EU15) ⁽¹⁾	0.01	0.01						
Rear Line Powder Spray Booth (EU28) ⁽¹⁾	0.01	0.01	-	-	-	-	-	-
Thin Film Line II: Three (3) natural gas direct fired process ovens, (EU16, EU17 and EU18)	0.32	1.28	0.10	0.93	14.13	16.82	negl.	negl.
I.D. Line Paint ⁽²⁾ Machine(EU31)	1.11	1.11	-	1.11	-	-	9.00 ⁽⁴⁾	20.74
O.D. Paint Station (EU39) ⁽²⁾	23.40	23.40	-	21.54	-	-	0.00	0.00
Rebar Patch (EU40) ⁽²⁾	0.01	0.01	-	0.58			0.00	0.00
Clean up solvent ⁽²⁾	-	-	-	0.25	-	-	3.23	3.23
30 gallon cold cleaning parts washer (EU41)	-	-	-	0.47	-	-	-	-
Ink Stamping	-	-	-	0.03	-	-	0.03	0.03
Plant Roads and Material Handling ⁽³⁾	31.30	10.96	-	-	-	-	-	-
Pyrolysis Oven (EU25)	0.06	0.06	0.01	0.08	0.00	0.12	negl.	negl.
Total PTE After Issuance	57.35	37.97	0.11	24.99	14.13	16.94	9.03	24.00

(1) Based on controlled potential emission
 (2) Based on material usage limitations
 (3) Based on uncontrolled PM and PM10 potential emissions
 (4) Included clean up solvent

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	Nonattainment
CO	Attainment
Lead	Attainment

- (a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxide (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8 hour ozone standard. Lake County has been designated as non-attainment for 8 hour ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) Lake County has been classified as attainment for or unclassifiable for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

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 and 40 CFR Part 61) included in this permit.
- (c) The source is not subject to 40 CFR 63, Subpart T (National Emission Standards for Hazardous Air Pollutants (NESHAP)-Halogenated Solvent Cleaning) because the parts washer does not use halogenated solvents.

Therefore, there are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 20 and 40 CFR 63) included in this permit.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration, PSD) and 326 IAC 2-3 (Emission Offset)

This source was constructed in 1965, before the applicability date of August 7, 1980, and is not one of the 28 listed source categories. Since 1980 the source has installed the following emission units:

- (a) EU28 in 1981;
- (b) EU16, EU17 and EU19 in 1984;
- (c) EU30 and EU31 in 1985;
- (d) EU18 in 1988;
- (e) EU21 and EU39 in 1997; and
- (f) EU27 in 2000.

Based on the source's actual emission records, the source has always been a PSD minor with PM and PM-10 emissions remaining at less than 100 tons per year and VOC emissions remaining at less than 25 tons per year since the source was originally constructed. For this FESOP Renewal permit review, the source shall continue to limit PM emissions to less than 100 tons per year (tpy) based on material usage limitations on the surface coating facilities and controlled potential to emit from the grain loading operations, which limit PM to 57.83 tpy, when operating the equipments at 8,760 hours per year. PM-10 and VOC emissions shall be limited to less than 100 tpy and less than 25 tpy, respectively, as described under the FESOP section below. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) are not applicable.

326 IAC 2-8-4 (FESOP)

- (a) The three (3) paint booths (EU31, EU39 and EU40) shall use less than 23.49 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the source's potential to emit of VOC to less than 25 tons per 12 consecutive month period. Compliance with this limit renders 326 IAC 2-7 not applicable.
- (b) The three (3) paint booths (EU31, EU39 and EU40) shall use less than 9 tons and 23.97 tons of any single HAP and any combination of HAPs, respectively, including coatings, dilution solvents, and cleaning solvents, per 12 consecutive month period. These usage limits are required to limit the source's potential to emit of any single HAP and any combination of HAPs to less than 10 tons and less than 25 tons, respectively, per 12 consecutive month period. Compliance with these limits make 326 IAC 2-7 not applicable.
- (c) Pursuant to 326 IAC 2-8 (FESOP):
 - (1) the PM-10 emissions from baghouses CE-15 and CE-13 controlling EU5 and EU14, respectively, shall each not exceed 2.35 pounds per hour, which is equivalent to 10.31 tons per year.
 - (2) the PM-10 emissions from dust collector CE-7 controlling EU27, shall not exceed 0.73 pounds per hour, which is equivalent to 3.22 tons per year.

- (3) the PM-10 emissions from baghouse CE-10 controlling EU30, shall not exceed 4.25 pounds per hour, which is equivalent to 18.6 tons per year.
- (4) the PM-10 emissions from dry filters CE-2 controlling EU7, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.
- (5) the PM-10 emissions from dry filters CE-4 controlling EU19, shall not exceed 1.32 pounds per hour, which is equivalent to 5.8 tons per year.
- (6) the PM-10 emissions from dry filters CE-14 controlling EU21, shall not exceed 0.44 pounds per hour, which is equivalent to 1.93 tons per year.
- (7) the PM-10 emissions from dry filter CE-8 controlling EU28, shall not exceed 0.29 pounds per hour, which is equivalent to 1.28 tons per year.
- (8) the PM-10 emissions from baghouse CE-3 controlling EU15, shall not exceed 0.15 pounds per hour, which is equivalent to 0.64 tons per year.

Compliance with these requirements shall limit the source wide potential to emit PM-10 to less than 100 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 and 326 IAC 2-3 do not apply.

326 IAC 5-1 (Opacity Limitations)

Since this source is located in the affected area of Lake County it is subject to the requirements of 326 IAC 5-1-2(2). Pursuant to 326 IAC 5-1-2(2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

326 IAC 2-4.1 [Major Sources of Hazardous Air Pollutants (HAPs)]

This provision applies to a major source of HAPs constructed or reconstructed after July 27, 1997, and after July 29, 1998, this provision is intended to implement Section 112(g)(2)(B) of the Clean Air Act (CAA). The source limits single HAP and any combination of HAPs emissions to less than 10 tons per year and 25 tons per year, therefore, this provision is not applicable to source.

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County and will be operating under FESOP, therefore, the requirements of 326 IAC 2-6 do not apply to the source.

State Rule Applicability – Individual Facilities

326 IAC 6.8-1-2 (Particulate Emissions Limitations)

The particulate matter emissions from EU5, EU14, EU27, EU30, EU7, EU19, EU37, EU28, EU21 and EU15 are subject to the requirements of 326 IAC 6.8-1-2 (Particulate Emissions Limitations) because this source is located in Lake County and has the potential to emit greater than 100 tons

per year of particulate matter. Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from each of the facilities listed above shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf). This is equivalent to a particulate allowable emission rate of the following:

Process/Facility	Exhaust Flow Rate (dscfm)	Allowable PM Emission Rate (lb/hr)
EU5	3,600	0.92
EU14	6,623	1.70
EU27	6,817	1.75
EU30	5,649	1.45
EU7	2,532	0.65
EU19	5,843	1.50
EU21	8,905	2.29
EU28	1,677	0.43
EU15	4,188	1.08
EU25	59	0.013
EU31	13,367	3.43
Insignificant Activities	-	0.5

Compliance with these limits shall make the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 6.8-10-1 (Fugitive Particulate Matter Emission Limits in Lake County)

This source is subject to the Particulate Matter Emission Limits requirements of 326 IAC 6.8-10-3 for each facility and operation having a potential to emit of 5 tons per year or more of fugitive PM. The O.D. Liquid Station (EU39) is a transportable material processing (surface coating) facility which does not exhaust through a designated vent. Coating materials are applied to steel pipe utilizing either a flow coat or airless methodology. PM emissions under the airless application method are considered as fugitive, and the emissions exceed the 5 ton per year rule applicability limit. Therefore, pursuant to 326 IAC 6.8-10-3(7) the O.D. Liquid Station shall be limited, respectively, to 10% opacity when operating outside of a building and to a zero percent frequency of visible emission observations when operating inside of a building enclosing all or part of the process.

326 IAC 6-3-2 (Process Operations)

Limitations established at 326 IAC 6-3 do not apply if limitations established at 326 IAC 6-1.8 apply. Since the requirements of 326 IAC 6.8-1 apply to this source, 326 IAC 6-3 is not applicable.

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

Pursuant to 326 IAC 6-5(a), the requirements of this rule do not apply to a source of fugitive PM emission located in Lake County. Since this source is located in Lake County, this rule does not apply.

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

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 I.D. Paint Machine (EU31), shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

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

326 IAC 8-7 (Specific VOC reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

This source is not subject to the requirements of 326 IAC 8-7, since total potential VOC emissions from all affected facilities are below 25 tons per year and potential VOC emissions from affected coating facilities are below 10 tons per year.

State Rule Applicability – Insignificant Facilities

326 IAC 8-3-5 (Degreasing Operation)

The provisions of 326 IAC 8-3-5 (Cold Cleaner Degrease Operation and Control), apply to cold cleaner degreaser without remote solvent reservoirs. Therefore, the provisions apply to the cold degreaser operations with control as follows

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, the Permittee shall ensure that the following control equipment 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 Permittee 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.

326 IAC 8-3-2 (Degreasing Operation)

Pursuant to 8-3-2 (Degreasing Operation), the Permittee of a cold cleaning facility shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operating requirements;
- (6) 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.

Testing Requirements

The Permittee shall perform PM and PM-10 testing by November 5, 2010 on the I.D. Line Abrasive Cleaning Machine equipped with airwash separator and grit reclaim, all identified as EU30, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent compliance demonstration to assure compliance with 326 IAC 6.8-1-2 (Particulate Emissions Limitations), 326 IAC 2-8 (FESOP), and 326 IAC 2-3 (Emission Offset) requirements. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Requirements

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

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 monitoring requirements applicable to this source are as follows:

1. The Thin Film Line I Abrasive Cleaning Machine (EU5), Thin Film Line II Abrasive Cleaning Machine (EU14), the I.D. Line Abrasive Cleaning Machine (EU30) equipped with a reclaim system and the Rebar Line Abrasive Cleaning Machine (EU27) have applicable compliance monitoring conditions as specified below:
 - (a) Daily visible emissions notations of the baghouse exhaust for EU5, EU14, EU30 and the dust collector exhaust for EU27 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously ~~anormal~~ 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. 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. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall record the pressure drop across the baghouse or the dust collector controlling the abrasive cleaning machines (EU5, EU14, EU30 and EU27), at least once per day when any associated abrasive cleaning machine is in operation. When for any one reading, the pressure drop across baghouses is outside the normal ranges of 1.0 to 6.0 inches of water, or ranges established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range 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.

These monitoring conditions are necessary because the baghouse and the cartridge dust collector for the abrasive cleaning processes must operate properly to ensure compliance with 326 IAC 5-1-2 (Opacity Limitations), 326 IAC 6.8-1-2 (Particulate Emission Limitations), and 326 IAC 2-8 (FESOP).

2. The I.D. Line Paint Machine (EU31), has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack for I.D. Line Paint Machine (EU31), S/V22, while the booth is in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C -Response to Excursions or Exceedances, shall be considered a deviation from this permit
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and general ventilation exhausts, and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emission is observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit

These monitoring conditions are necessary because the dry filters for the surface coating processes must operate properly to ensure compliance with 326 IAC 5-1-2 (Opacity Limitations), 326 IAC 6.8-1-2 (Particulate Emission Limitations), and 326 IAC 2-8 (FESOP).

Conclusion

The operation of this metal pipe/bar, abrasive cleaning and coating operation shall be subject to the conditions of FESOP Renewal No.: F089-24010-00096.

Appendix A: Emission Calculations

Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006

Uncontrolled Potential Emissions (tons/year)								
Emissions Generating Activity								
Pollutant	Combustion	Surface Coating	Cleaning/Powder Coating	Pyrolysis Oven	Cold Cleaner Degreaser	Ink Stamping	Material Handling & Plant Roads	TOTAL
PM	0.32	637.52	1,159.69	0.06	0.00	0.00	31.30	1,828.89
PM10	1.28	637.52	1,159.69	0.06	0.00	0.00	10.96	1,809.51
SO2	0.10	0.00	0.00	0.01	0.00	0.00	0.00	0.11
NOx	16.82	0.00	0.00	0.12	0.00	0.00	0.00	16.94
VOC	0.93	617.84	0.00	0.08	0.47	0.03	0.00	619.35
CO	14.13	0.00	0.00	0.00	0.00	0.00	0.00	14.13
total HAPs	0.00	129.96	0.00	0.00	0.00	0.03	0.00	129.99
worst case single HAP	0.00	86.18	0.00	0.00	0.00	0.03	0.00	86.18
		xylene						
Total emissions based on rated capacity at 8,760 hours/year.								
Controlled Potential Emissions (tons/year)								
Emissions Generating Activity								
Pollutant	Combustion	Coating	Abrasive Cleaning/ Blasting/Powder	Pyrolysis Oven	Cold Cleaner/ Degreaser	Ink Stamping	Material Handling & Plant Roads	TOTAL
PM	0.32	24.52	1.15	0.06	0.00	0.00	31.30	57.35
PM10	1.28	24.52	1.15	0.06	0.00	0.00	10.96	37.97
SO2	0.10	0.00	0.00	0.01	0.00	0.00	0.00	0.11
NOx	16.82	0.00	0.00	0.12	0.00	0.00	0.00	16.94
VOC	0.93	23.48	0.00	0.08	0.47	0.03	0.00	< 25.00
CO	14.13	0.00	0.00	0.00	0.00	0.00	0.00	14.13
total HAPs	0.00	23.97	0.00	0.00	0.00	0.03	0.00	24.00
worst case single HAP	0.00	9.00	0.00	0.00	0.00	0.03	0.00	9.03
		xylene						
Total emissions based on rated capacity at 8,760 hours/year, after control.								

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

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP Renewal: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 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
Sherwin-Williams Phenicon	EU31 (ID Line)	13.7	16.20%	0.00%	16.2%	0.00%	0.00%	0.00042	35,000	2.22	2.22	32.63	783.00	142.90	184.80		75%
Lilly Flowliner	EU31 (ID Line)	13.7	22.60%	0.00%	22.6%	0.00%	58.50%	0.00042	35,000	3.10	3.10	45.51	1092.34	199.35	170.68	5.29	75%
Ameron 395	EU31 (ID Line)	13.2	8.20%	0.00%	8.2%	0.00%	0.00%	0.00043	35,000	1.08	1.08	16.29	390.96	71.35	199.70		75%
Powercrete	EU39 (OD Station)	14.72	5.20%	0.00%	5.2%	0.00%	90.70%	0.00078	35,000	0.77	0.77	20.90	501.52	91.53	0.00	0.84	100%
Sherwin-Williams Yellow	EU39 (OD Station)	9.13	58.80%	50.20%	8.6%	0.00%	34.90%	0.00126	35,000	0.79	0.79	34.63	831.03	151.66	181.64	2.25	75%
Sherwin-Williams Red	EU39 (OD Station)	8.65	69.80%	53.70%	16.1%	0.00%	33.80%	0.0013	35,000	1.39	1.39	63.37	1520.77	277.54	130.15	4.12	75%
Speciality Polymer	EU39 (OD Station)	11.9	0.00%	0.00%	0.0%	0.00%	0.00%	0.00096	35,000	0.00	0.00	0.00	0.00	0.00	437.82		75%
Sherwin-Williams Red Oxide	EU39 (OD Station)	13.88	18.10%	0.00%	18.1%	0.00%	0.00%	0.000831	35,000	2.51	2.51	73.07	1753.67	320.05	362.04		75%
Sherwin-Williams Coal Tar Epox	EU39 (OD Station)	9.8	23.20%	0.28%	22.9%	0.00%	0.00%	0.00117	35,000	2.25	2.25	92.00	2208.01	402.96	337.49		75%
3M SK413/215 PC	EU40 (Rebar Patch)	10.34	26.60%	0.0%	26.6%	0.0%	67.40%	0.00003	30000.00	2.75	2.75	2.48	59.41	10.84	0.00	4.08	100%
Clean-up Solvent		7.09	100.00%	0.0%	100.0%	0.0%	0.00%	1320.000	gal / year	7.09	7.09	1.07	25.64	4.68	0.00		75%
Uncontrolled Potential Emissions												141.06	3385.40	617.84	637.52		

Add worst case coating to all solvents

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
 Controlled emission rate = uncontrolled emission rate * (1 - control efficiency)
 Material usage at Process EU31 (I.D. Coating Booth) will be limited to 10.44% of potential material usage based on 8,760 hours per year operation in order to limit xylene as a single hazardous air pollutant (HAP) to 9 tons per year.
 Total material usage (i.e., VOC delivered to applicator) will be limited to 5.34% of total potential material usage based on 8,760 hours per year operation in order to limit VOC from surface coating to 23.48 tons per year.
 Also, such a material usage limit will have the incidental effect of reducing PM-10 emissions to less than the FESOP limit of 100 tpy.

Control Efficiency:		Controlled VOC lbs per Hour	Controlled VOC lbs per Day	Controlled VOC tons per Year	Controlled PM tons/yr
VOC	VOC (EU31)	5.36	128.68	23.48	24.52
94.65%	89.56%				

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006

Material		Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Chromium Compounds	Weight % Xylene	Weight % Ethylbenzene	Weight % MEK	Weight % Glycol Ethers	Weight % Toluene	Weight % Manganese Compounds	Weight % Nickel Compounds	HAP EMISSION RATES (TONS PER YEAR)								Total
													Chromium Compounds (ton/yr)	Xylene (ton/yr)	Ethylbenzene (ton/yr)	MEK (ton/yr)	Glycol Ethers (ton/yr)	Toluene (ton/yr)	Manganese Compounds (ton/yr)	Nickel Compounds (ton/yr)	
Sherwin-Williams Phenicon	EU31 (ID Line)	13.7	0.00042	35,000	0.00%	9.63%	1.75%	0.88%	0.00%	0.00%	0.00%	0.00%	0.00	84.95	15.44	7.76	0.00	0.00	0.00	0.00	0.00
Lilly Flowliner	EU31 (ID Line)	13.7	0.00042	35,000	0.00%	9.77%	2.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	86.18	17.82	0.00	0.00	0.00	0.00	0.00	0.00
Ameron 395	EU31 (ID Line)	13.2	0.00043	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Powercrete	EU39 (OD Station)	14.72	0.00078	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sherwin-Williams Yellow	EU39 (OD Station)	9.13	0.00126	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sherwin-Williams Red	EU39 (OD Station)	8.65	0.0013	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Speciality Polymer	EU39 (OD Station)	11.9	0.00096	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Shervin-Williams Red Oxide	EU39 (OD Station)	13.88	0.000831	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Sherwin-Williams Coal Tar Epoxy	EU39 (OD Station)	9.8	0.00117	35,000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3M SK413/215 PC	EU40 (Rebar Patch)	10.34	0.00003	30000.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Clean-up Solvent		7.09	1320.000 gal / year		0.00%	0.00%	0.00%	0.00%	0.00%	69.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	3.23	0.00	0.00
Black Offset Ink		see Appendix A, Page 8 of 15			0.00%	0.00%	0.00%	0.00%	58.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.02	0.00	0.00	0.00	0.00
Offset Ink Thinner		see Appendix A, Page 8 of 15			0.00%	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
Abrasive Cleaning Machines and TFII Blow Out		853.8	tons PM / yr		0.25%	0.00%	0.00%	0.00%	0.00%	0.00%	1.30%	0.20%	2.13	0.00	0.00	0.00	0.00	0.00	11.10	1.71	
Total State Potential Emissions													2.13	86.18	17.82	7.76	0.03	3.23	11.10	1.71	129.96
Total Federal Potential Emissions													2.1E-03	9.00	1.86	0.81	0.03	3.23	0.01	1.7E-03	14.94

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Total federal potential emissions for emission unit EU31 (I.D. Coating Booth) reflect material usage limited to 10.44% of potential usage based on 8,760 hours per year of operation in order to limit xylene emissions to 9 tons per year

Total state potential emissions for abrasive cleaning machines and TFII blow out are based on PM calculations contained in Appendix A, Page 5 of 11. Total federal potential emissions for abrasive cleaning machines reflect fabric filter efficiency of 99.9%.

Appendix A: Process Particulate Emissions

Company Name: Midwest Pipe Coating, Inc.
 Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
 FESOP: F089-24010-00096
 REVIEWER: Lek R. Traivaranon
 Date: December 18, 2006

State Potential Emissions (tons/year)								
A. Baghouses Control Unit ID	Facility Controlled by Control Device	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total PTE (TONS/YR)	
								CE15
CE13	TF II Cleaning Machine (EU14)	1	0.00042	10,000	1	99.90%	157.68	
CE2	TF I Coating Booth (EU7)	1	0.00014	2,600	1	99.90%	13.67	
CE3	TF II Blow Out Station (EU15)	1	0.00008	4,300	1	99.90%	12.91	
CE4	TF II Coating Booth (EU19)	1	0.00042	6,000	1	99.90%	94.61	
CE7	Rebar Cleaning Machine (EU27)	1	0.00015	9,000	1	99.90%	50.68	
CE8	Rebar Coating Booth (EU28)	1	0.00013	1,722	1	99.90%	8.40	
CE10	I.D. Cleaning Machine (EU30)	1	0.00117	14,400	1	99.90%	632.52	
CE14	Custom II Coating Booth (EU21)	1	0.00007	12,000	1	99.90%	31.54	
Total Emissions Based on Rated Capacity at 8,760 Hours/Year							1159.69	
Federal Potential Emissions (tons/year)								
A. Baghouses Control Unit ID	Facility Controlled by Control Device	No. of Units	Grain Loading per Actual Cubic Foot of Outlet Air	Air to Cloth Ratio Air Flow (acfm/ft²)	Total Filter Area (ft²)	Control Efficiency	Total (tons/yr)	326 IAC 6.8-1-2 PM Allowable lb/hr
CE13	TF II Cleaning Machine (EU14)	1	0.00042	10,000	1	99.90%	0.16	1.70
CE2	TF I Coating Booth (EU7)	1	0.00014	2,600	1	99.90%	0.01	0.65
CE3	TF II Blow Out Station (EU15)	1	0.00008	4,300	1	99.90%	0.01	1.08
CE4	TF II Coating Booth (EU19)	1	0.00042	6,000	1	99.90%	0.09	1.50
CE7	Rebar Cleaning Machine (EU27)	1	0.00015	9,000	1	99.90%	0.05	1.75
CE8	Rebar Coating Booth (EU28)	1	0.00013	1,722	1	99.90%	0.01	0.43
CE10	I.D. Cleaning Machine (EU30)	1	0.00117	14,400	1	99.90%	0.63	1.45
CE14	Custom II Coating Booth (EU21)	1	0.00007	12,000	1	99.90%	0.03	2.29
Total Emissions Based on Rated Capacity at 8,760 Hours/Year and source controls							1.16	

Methodology:

State Potential (uncontrolled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Federal Potential (controlled):

Baghouse (tons/yr) = No. Units * Loading (grains/acf) * Air/Cloth Ratio (acfm/ft²) * Filter Area (ft²) * 1 lb/7,000 grains * 60 min/hr * 8760 hr/yr * 1 ton/2,000 lbs * 1/(1-Control Efficiency)

Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006

Baghouse CE2

0.01 ton/yr *	2000 lb/ton *	7000 gr/lb =	1.1E-04 gr/dscf	(will comply)
525,600 min/yr *	2,532 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 2.85 tons per year, or 0.65 lbs/hr.

Note:
SCFM = 2,600 acfm * (460 + 68) * (1-0.0261) / (460 + 68)
= 2,532 dscfm

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE3

0.01 ton/yr *	2000 lb/ton *	7000 gr/lb =	6.4E-05 gr/dscf	(will comply)
525,600 min/yr *	4,188 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 4.72 tons per year, or 1.08 lbs/hr.

Note:
SCFM = 4,300 acfm * (460 + 68) * (1-0.0261) / (460 + 68)
= 4,188 dscfm

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE4

0.09 ton/yr *	2000 lb/ton *	7000 gr/lb =	4.1E-04 gr/dscf	(will comply)
525,600 min/yr *	5,843 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 6.58 tons per year, or 1.50 lbs/hr.

Note:
SCFM = 6,000 acfm * (460 + 68) * (1-0.0261) / (460 + 68)
= 5,843 dscfm

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE5

0.14 ton/yr *	2000 lb/ton *	7000 gr/lb =	6.4E-04 gr/dscf	(will comply)
525,600 min/yr *	5,843 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 6.58 tons per year, or 1.50 lbs/hr.

Note:
SCFM = 6,000 acfm * (460 + 68) * (1-0.0261) / (460 + 68)
= 5,843 dscfm

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE7

0.05 ton/yr *	2000 lb/ton *	7000 gr/lb =	2.0E-04 gr/dscf	(will comply)
525,600 min/yr *	6,817 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 7.68 tons per year, or 1.75 lbs/hr.

Note:
SCFM = 7,000 acfm * (460 + 68) * (1-0.0261) / (460 + 68)
= 6,817 dscfm

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Company Name: Midwest Pipe Coating, Inc.
 Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
 FESOP: F089-24010-00096
 Reviewer: Lek R. Traivaranon
 Date: December 18, 2006

Baghouse CE8

0.01 ton/yr *	2000 lb/ton *	7000 gr/lb =	1.6E-04 gr/dscf	(will comply)
525,600 min/yr *	1,677 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 1.89 tons per year, or

0.43 lbs/hr.

Note:

$$\text{SCFM} = \frac{1,722 \text{ acfm} * (460 + 68) * (1 - 0.0261)}{(460 + 68)}$$

$$= 1,677 \text{ dscfm}$$

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE10

0.63 ton/yr *	2000 lb/ton *	7000 gr/lb =	3.0E-03 gr/dscf	(will comply)
525,600 min/yr *	5,649 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 6.36 tons per year, or

1.45 lbs/hr.

Note:

$$\text{SCFM} = \frac{5,800 \text{ acfm} * (460 + 68) * (1 - 0.0261)}{(460 + 68)}$$

$$= 5,649 \text{ dscfm}$$

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE14

0.03 ton/yr *	2000 lb/ton *	7000 gr/lb =	9.0E-05 gr/dscf	(will comply)
525,600 min/yr *	8,905 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 10.03 tons per year, or

2.29 lbs/hr.

Note:

$$\text{SCFM} = \frac{9,144 \text{ acfm} * (460 + 68) * (1 - 0.0261)}{(460 + 68)}$$

$$= 8,905 \text{ dscfm}$$

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE13

0.32 ton/yr *	2000 lb/ton *	7000 gr/lb =	1.3E-03 gr/dscf	(will comply)
525,600 min/yr *	6,623 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 7.46 tons per year, or

1.70 lbs/hr.

Note:

$$\text{SCFM} = \frac{6,800 \text{ acfm} * (460 + 68) * (1 - 0.0261)}{(460 + 68)}$$

$$= 6,623 \text{ dscfm}$$

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Baghouse CE15

0.32 ton/yr *	2000 lb/ton *	7000 gr/lb =	2.4E-03 gr/dscf	(will comply)
525,600 min/yr *	3,600 dscf/min			

Allowable particulate emissions under 326 IAC 6.8-1-2 equate to 4.05 tons per year, or

0.93 lbs/hr.

Note:

$$\text{SCFM} = \frac{3,696 \text{ acfm} * (460 + 68) * (1 - 0.0261)}{(460 + 68)}$$

$$= 3,600 \text{ dscfm}$$

Assumes exhaust gas temperature of 68F, exhaust gas moisture content of 2.61% and exhaust gas flow of 7,000 acfm.

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Three ovens, rated at 12.8 MMBtu/hr each****Company Name: Midwest Pipe Coating, Inc.****Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375****FESOP: F089-24010-00096****Reviewer: Lek R. Traivaranon****Date: December 18, 2006**

Heat Input Capacity MMBtu/hr	Unit ID	Potential Throughput MMCF/yr
38.4		336.4
12.8	EU16	
12.8	EU17	
12.8	EU18	

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.90	7.60	0.60	100.00	5.50	84.00
				**see below		
Potential Emission in tons/yr	0.32	1.28	0.10	16.82	0.93	14.13

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: ID Ink Stamping

Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006

Total potential ink usage at TFI, TFI and Extracoat production lines:

6 quarts per quarter

MSDS lists VOC content as 567 g/l

Potential VOC emissions:

$6 \text{ qts} / 3 \text{ mos} * 12 \text{ mos} / \text{yr} * 1 \text{ gal} / 4 \text{ qts} * 567 \text{ g} / \text{l} * 1 \text{ kg} / 1000 \text{ g} * 8.345 \text{ (lb/gal)} / \text{(kg/l)} = 28.4 \text{ lb VOC} / \text{yr}$

Potential HAP emissions:

MSDS lists glycol ethers as 58% (weight) of ink. It is assumed that this is 100% of ink VOC content. Therefore,

HAPS = 28.4 lb / yr

To maintain the properties of the ink during the winter months, a small amount of thinner may be added. Potential thinner estimated at 3 gallons per year.

MSDS lists VOC content as 948 g/l

Potential VOC emissions:

$3 \text{ gal} / \text{yr} * 948 \text{ g} / \text{l} * 1 \text{ kg} / 1000 \text{ g} * 8.345 \text{ (lb/gal)} / \text{(kg/l)} = 23.7 \text{ lb VOC} / \text{yr}$

Potential HAP emissions:

MSDS lists glycol ethers as 100% (weight) of thinner. Therefore, HAPS = 23.7 lb VOC / yr

Total potential VOC and HAP emissions from pipe ID ink stamping:

$28.4 \text{ lb} / \text{yr} + 23.7 \text{ lb} / \text{yr} = 52.1 \text{ lb VOC} / \text{yr}$ (0.03 ton per year)

This facility is not subject to the provisions of 326 IAC 8-2-9 as the actual emissions are less than 15 lb / day.

**Appendix A: Emission Calculations
Pyrolysis Cleaning Oven with Afterburner**

Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006

MATERIAL THROUGH PUT lbs/hr 10

TONS/YR
ton/yr
43.8

Emission Factor in lb pollutant/lb material	POLLUTANT				
	PM 0.00133	SO2 0.00018	CO 0.00000	VOC 0.00174	NOX 0.00271
Potential Emissions in ton/yr	0.06	0.01	0.00	0.08	0.12

Methodology

Emission factors are from manufacturer.

Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

State and Federal Potential to Emit is the same for this process unit as the afterburner is integral to the facility and cannot be operated separate from the pyrolysis furnace.

The facility is subject to a PM emission limit of 0.03 grains per dscf, as defined at 326 IAC 6-1-2. The facility complies with this limit as follows:
 exhaust flow at standard conditions is 59 cfm; potential PM emission rate is 0.05825 tpy (0.0133 lb / hr)
 $(\text{gr} / \text{scf}) = (0.0133 \text{ lb} / \text{hr}) * (7000 \text{ gr} / \text{lb}) * (\text{hr} / 60 \text{ min}) * (\text{min} / 59 \text{ scf}) = 0.026 \text{ gr} / \text{scf}$

**Appendix A: Emissions Calculations
VOC
From Parts Washer Operation**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Gal of Mat. (gal/hr)	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	Transfer Efficiency
EU41												
CC100 parts washer	6.5	100.00%	0.0%	100.0%	0.0%	0.01655	6.54	6.54	0.11	2.60	0.47	0%

State Potential Emissions

0.11 2.60 0.47

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 per hour (gal/hr)
 Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal per hour (gal/hr) * (24 hr/day)
 Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal per hour (gal/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
 Gallon per hour assumes consumption of 145 gallons per year of degreaser solvent. The degreaser facility actually averages 90 gallons per year.

**Appendix A: Emission Calculations
Material Conveying/Handling**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006**

**** conveying / handling (ID004)****

The following calculations determine the amount of emissions created by material handling, based on 8,760 hours of use and AP-42, Section 13.2.4, Equation 1. The emission factor for calculating PM emissions is calculated as follows:

PM-10 Emissions:

$$E = k \cdot (0.0032) \cdot \left(\frac{U}{5} \right)^{1.3} \cdot \left(\frac{M}{2} \right)^{1.4}$$

$$= 1.12E-03 \text{ lb PM-10/ton}$$

$$2.37E-03 \text{ lb PM/ton}$$

where k = 0.35 (particle size multiplier for <10um)
0.74 (particle size multiplier for <30um)
U = 12 mph mean wind speed
M = 4.5 material moisture content (%)

$$\frac{60 \text{ ton/hr} \cdot 8,760 \text{ hrs/yr} \cdot E_f \text{ (lb/ton of material)}}{2,000 \text{ lb/ton}} = \text{(ton/yr)}$$

Total PM 10 Emissions: 0.30 tons/yr
Total PM Emissions: 0.62 tons/yr

**Appendix A: Emission Calculations
Material Conveying/Handling**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006**

**** storage (Fugitive ID 003)****

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

$$E_f = 1.7 \cdot (s/1.5)^3 \cdot (365-p) / 235 \cdot (f/15)$$

$$= 5.56 \text{ lb/acre/day}$$

where $s = 4.8$ % silt

$p = 125$ days of rain greater than or equal to 0.01 inches

$f = 15$ % of wind greater than or equal to 12 mph

$$E_p (\text{storage}) = \frac{E_f \cdot sc \cdot (20 \text{ cuft/ton}) \cdot (365 \text{ day/yr})}{(2,000 \text{ lb/ton}) \cdot (43,560 \text{ sqft/acre}) \cdot (12 \text{ ft})}$$

where $sc = 400$ tons storage capacity

PM = 0.02 tons/yr

P M-10: 35% of PM = 0.01 tons/yr

**Appendix A: Emission Calculations
Material Conveying/Handling**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006**

**** forklift truck 1 ****

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

4 trip/hr x
0.05 mile/trip x
2 (round trip) x
8760 hr/yr = 3504 miles per year

$$E_f = k \cdot 5.9 \cdot (s/12) \cdot (S/30) \cdot (W/3)^{0.7} \cdot (w/4)^{0.5} \cdot ((365-p)/365)$$

$$= 1.09 \text{ lb/mile}$$

where k = 0.8 (size multiplier)
s = 6 % silt content of unpaved roads
p = 125 days of rain greater than or equal to 0.01 inches
S = 5 miles/hr vehicle speed
W = 18 tons average vehicle weight
w = 6 wheels

$$\frac{1.09 \text{ lb/mi} \times 3504 \text{ mi/yr}}{2000 \text{ lb/ton}} = 1.91 \text{ tons/yr}$$

P M-10: 35% of PM = 0.67 ton/yr

**Appendix A: Emission Calculations
Material Conveying/Handling**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 18, 2006**

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

6 trip/hr x
0.25 mile/trip x
2 (round trip) x
8760 hr/yr = 26280 miles per year

$$E_f = k \cdot 5.9 \cdot (s/12) \cdot (S/30) \cdot (W/3)^{0.7} \cdot (w/4)^{0.5} \cdot ((365-p)/365)$$

$$= 1.49 \text{ lb/mile}$$

where k = 0.8 (particle size multiplier)
s = 6 % silt content of unpaved roads
p = 125 days of rain greater than or equal to 0.01 inches
S = 5 miles/hr vehicle speed
W = 27 tons average vehicle weight
w = 6 wheels

$$\frac{1.49 \text{ lb/mi} \times 26280 \text{ mi/yr}}{2000 \text{ lb/ton}} = 19.60 \text{ tons/yr}$$

P M-10: 35% of PM = 6.86 ton/yr

**Appendix A: Emission Calculations
Material Conveying/Handling**

**Company Name: Midwest Pipe Coating, Inc.
Address City IN Zip: 925 Kennedy Ave. Schererville, IN 46375
FESOP: F089-24010-00096
Reviewer: Lek R. Traivaranon
Date: December 8, 2006**

* * shuttle tractor with trailer * *

The following calculations determine the amount of emissions created by vehicle traffic on unpaved roads, based on 8760 hours of use and AP-42, Ch 11.2.1.

$$\begin{aligned}
 & 4 \text{ trip/hr} \times \\
 & 0.2 \text{ mile/trip} \times \\
 & 2 \text{ (round trip) } \times \\
 & 8760 \text{ hr/yr} = \qquad \qquad \qquad 14016 \text{ miles per year}
 \end{aligned}$$

$$\begin{aligned}
 E_f &= k \cdot 5.9 \cdot (s/12) \cdot (S/30) \cdot (W/3)^{0.7} \cdot (w/4)^{0.5} \cdot ((365-p)/365) \\
 &= 1.40 \text{ lb/mile}
 \end{aligned}$$

- where k = 0.8 (particle size multiplier)
- s = 6 % silt content of unpaved roads
- p = 125 days of rain greater than or equal to 0.01 inches
- S = 5 miles/hr vehicle speed
- W = 25 tons average vehicle weight
- w = 6 wheels

$$\frac{1.40 \text{ lb/mi} \times 14016 \text{ mi/yr}}{2000 \text{ lb/ton}} = 9.79 \text{ tons/yr}$$

P M-10: 35% of PM = 3.43 ton/yr