



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant  
DATE: November 6, 2008  
RE: Brandenburg Industrial Service / 089-25094-00176  
FROM: Matthew Stuckey, Deputy Branch 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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## Part 70 Operating Permit OFFICE OF AIR QUALITY

**Brandenburg Industrial Service Company  
1 N. Broadway, TS 670  
Gary, Indiana 46402**

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

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 089-25094-00176	
Original signed by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: November 6, 2008  Expiration Date: November 6, 2013

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY.....</b>	<b>5</b>
A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4 Part 70 Permit Applicability [326 IAC 2-7-2]	
<b>B. GENERAL CONDITIONS .....</b>	<b>7</b>
B.1 Definitions [326 IAC 2-7-1]	
B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability [326 IAC 2-7-7]	
B.5 Severability [326 IAC 2-7-5(5)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11 Emergency Provisions [326 IAC 2-7-16]	
B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21 Source Modification Requirement [326 IAC 2-7-10.5]	
B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS .....</b>	<b>18</b>
<b>Emission Limitations and Standards [326 IAC 2-7-5(1)]</b>	
C.1 Opacity [326 IAC 5-1]	
C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4 Fugitive Dust Emissions [326 IAC 6-4]	
C.5 Fugitive Dust Emissions [326 IAC 6.8-10-3]	
C.6 Stack Height [326 IAC 1-7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	

**Testing Requirements [326 IAC 2-7-6(1)]**

- 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 2-7-5(1)][326 IAC 2-7-6(1)]**

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 2-7-5(3)]  
[326 IAC 2-7-6(1)]

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

- C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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

- C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]  
[326 IAC 2-6]
- C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.18 General Reporting Requirements [326 IAC 2-7-5(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 - Scrap Iron and Steel Prep Operations ..... 26**

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

- D.1.1 Particulate Limitations [326 IAC 6.8-1-2(a)]
- D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.1.3 Particulate Control [326 IAC 2-7-6(6)]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

- D.1.4 Parametric Monitoring
- D.1.5 Broken or Failed Baghouse Detection
- D.1.6 Cyclone Failure Detection

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

- D.1.7 Record Keeping Requirements

**D.2 EMISSIONS UNIT OPERATION CONDITIONS - Paint Booth and Blast booth ..... 28**

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

- D.2.1 Emission Offset Minor Limit [326 IAC 2-2]
- D.2.2 Particulate Emissions [326 IAC 6.8-1-2(a)] [326 IAC 6-3-2(d)]
- D.2.3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

**Compliance Determination Requirements**

- D.2.5 Testing Requirements [326 IAC 2-7-6(5)(c)][326 IAC 2-1.1-11]
- D.2.6 Particulate Control [326 IAC 2-7-6(6)]
- D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

**Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]**

- D.2.8 Monitoring

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

- D.2.9 Record Keeping Requirements
- D.2.10 Reporting Requirements

**D.3 EMISSIONS UNIT OPERATION CONDITIONS - Insignificant Activities ..... 31**

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

- D.3.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

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

- D.3.2 Record Keeping Requirements [326 IAC 8-9-6(a) and (b)]
- D.3.3 Reporting Requirements [326 IAC 8-9-6(a) and (b)]

Certification .....	32
Emergency Occurrence Report .....	33
Quarterly Report.....	35
Quarterly Deviation and Compliance Monitoring Report .....	36

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

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

---

The Permittee owns and operates a stationary scrap steel processing operation.

Source Address:	1 N. Broadway, TS 670, Gary, Indiana 46402
Mailing Address:	PO Box M-908, Gary, Indiana 46401-0908
General Source Phone Number:	(219) 881-0200
SIC Code:	1795 and 5093
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, under Nonattainment NSR Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

---

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

#### Scrap Iron and Steel Preparation Operations - Unit 001

- (a) One (1) Scrap Steel Preparation (burning field) process, identified as Unit 001, with a capacity to cut 30 tons per hour of scrap steel using LPG (propane) torches, located inside a building without an outside vent, constructed in 1995.
- (b) One (1) Scrap Preparation (roll burning hood) process, identified as Unit 001, with a capacity to cut 10 tons per hour of steel rolls using LPG (propane) torches, using a dual cyclone and baghouse as control, constructed in 1995, and exhausting to stack 1.
- (c) One (1) scrap cast iron baling operation, identified as Unit 001, with a maximum capacity of 50 tons per hour (a sporadic process done eight (8) to ten (10) hours per week), constructed in 1995.

#### Paint Booth and Blast Booth

- (a) One (1) paint booth using airless or air atomization spray guns to apply primer and finish coats to metal trailers and lunch boxes, identified as Unit 002, with a maximum paint usage of 3.63 gallons of primer per hour and 1.4 gallons of finish coat per hour, using dry filters as control, constructed in 2002, and exhausting to stacks PBES-01 and PBES-02.
- (b) One (1) enclosed blast booth, identified as Unit 003, equipped with two (2) blast guns, with each having a maximum capacity of 240 square feet of metal per hour and 105.4 pounds of steel grit per minute per nozzle, using dry filters as control, constructed in 2002, and

exhausting inside the building.

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

---

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

- (a) One (1) petroleum fuel (non-gasoline) dispensing facility, with a storage capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. [326 IAC 8-9-1]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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

(a) This permit, T 089-25094-00176, 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, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]**

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 2-7-5(5)]**

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 2-7-5(6)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (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 the "responsible official" 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]**

---

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.11 Emergency Provisions [326 IAC 2-7-16]**

---

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a 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  
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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  
MC 61-53 IGCN 1003  
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 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-4(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T 089-25094-00176 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(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  
MC 61-53 IGCN 1003  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

---

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
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 2-7 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 Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

---

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

---

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

---

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) 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 preconstruction approval required by 326 IAC 2-7-10.5 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  
MC 61-53 IGCN 1003  
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 2-7-20(b),(c), or (e). 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 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) 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.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-3.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 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 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 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 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.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][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) Except as provided in 326 IAC 2-7-19(e), 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][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 2-7-5(1)]

#### C.1 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.2 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.3 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.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 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 August 02, 2007.

#### C.6 Stack Height [326 IAC 1-7]

---

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

#### 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  
MC 61-52 IGCN 1003  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **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  
MC 61-53 IGCN 1003  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-5(1)][326 IAC 2-7-6(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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  
MC 61-53 IGCN 1003  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification 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 2-7-5(3)] [326 IAC 2-7-6(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 instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [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.14 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

- (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

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

**C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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  
MC 61-53 IGCN 1003  
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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, 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.

## **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 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description: Scrap Iron and Steel Preparation Operations

- (a) One (1) Scrap Steel Preparation (burning field) process, identified as Unit 001, with a capacity to cut 30 tons per hour of scrap steel using LPG (propane) torches, located inside a building without an outside vent, constructed in 1995.
- (b) One (1) Scrap Preparation (roll burning hood) process, identified as Unit 001, with a capacity to cut 10 tons per hour of steel rolls using LPG (propane) torches, using a dual cyclone and baghouse as control, constructed in 1995, and exhausting to stack 1.
- (c) One (1) scrap cast iron baling operation, identified as Unit 001, with a maximum capacity of 50 tons per hour (a sporadic process done eight (8) to ten (10) hours per week), constructed in 1995.
- (d) Material transported on paved and unpaved roads.

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

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

#### D.1.1 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Particulate Limitations: General Sources), the particulate from the Scrap Preparation (roll burning hood) process shall be limited to three-hundredths (0.03) grain per dry standard cubic foot (dscf).

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.1.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) The dual cyclone and baghouse for particulate control shall be in operation and control particulate emissions from the roll burning hood at all time the roll burning hood is 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.

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

#### D.1.4 Parametric Monitoring

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with the roll burning hood, at least once per day, when the roll burning hood is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.0 and 8.0 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 of 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.1.5 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 baghouses controlling emissions from a batch process, a failed unit and the associated 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 roll burning hood. 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.

#### D.1.6 Cyclone Failure Detection

---

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation of this permit.

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

#### D.1.7 Record Keeping Requirements

---

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain the daily records of the pressure drop across the baghouse controlling the roll burning hood. 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, (e.g. the process did not operate that day).
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Emissions Unit Description: Paint Booth and Blast Booth

- (a) One (1) paint booth using airless or air atomization spray guns to apply primer and finish coats to metal trailers and lunch boxes, identified as Unit 002, with a maximum paint usage of 3.63 gallons of primer per hour and 1.4 gallons of finish coat per hour, using dry filters as control, constructed in 2002, and exhausting to stacks PBES-01 and PBES-02.
- (b) One (1) enclosed blast booth, identified as Unit 003, equipped with two (2) blast guns, with each having a maximum capacity of 240 square feet of metal per hour and 105.4 pounds of steel grit per minute per nozzle, using dry filters as control, constructed in 2002, and exhausting inside the building.

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

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

#### D.2.1 Emission Offset Minor Limit [326 IAC 2-3]

The VOC input to the paint booth, identified as Unit 002, shall be less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above VOC limit, in combination with the VOC emissions from the other emission units, shall limit the sourcewide VOC emissions to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render 326 IAC 2-3 (Emission Offset) not applicable to the source.

#### D.2.2 Particulate Emissions [326 IAC 6.8-1-2(a)] [326 IAC 6-3-2(d)]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate matter emissions from the paint booth, identified as Unit 002, and blast booth, identified as Unit 003, shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

#### D.2.3 Volatile Organic Compound (VOC) [326 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint booth, identified as Unit 002, shall be limited to 3.5 pounds of VOC per gallon of coating less water.

Compliance with the VOC content limit shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum(C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and  
U is the usage rate of the coating in gallons per day.

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

---

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

### Compliance Determination Requirements

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

---

In order to comply with Condition D.2.2, within 180 days of issuance of this permit, the Permittee shall perform PM, PM<sub>10</sub>, and PM<sub>2.5</sub> testing for the enclosed blast booth identified as Unit 003, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the last valid compliance demonstration. PM<sub>10</sub> and PM<sub>2.5</sub> includes filterable and condensable PM<sub>10</sub> and PM<sub>2.5</sub>. Testing shall be conducted in accordance with Section C - Performance Testing.

#### D.2.6 Particulate Control [326 IAC 2-7-6(6)]

---

- (a) In order to comply with Condition D.2.2, the dry filters used to control particulate emissions shall be in operation and control emissions from the paint booth at all times the paint booth is in operation.
- (b) In order to comply with Condition D.2.2, the dry filters used to control particulate emissions shall be in operation and control emissions from the blast booth at all times the blast booth is in operation.

#### D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-1-4] [326 IAC 8-1-2(a)]

---

Compliance with the VOC content and usage limitations shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

#### D.2.8 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 paint booth while the booth is in operation. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C-Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Response to Excursions or Exceedances shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a violation of this permit.

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

#### D.2.9 Record Keeping Requirements

---

- (a) To document compliance with Conditions D.2.1 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5)

shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content and usage limits and the VOC emission limits established in Conditions D.2.1 and D.2.3.

- (1) The amount of VOC in each coating material and solvent used;
  - (2) The amount of coating material and solvent less water used on a daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) The volume weighted VOC content of the coating used for each day;
  - (4) The cleanup solvent usage for each day; and
  - (5) The total VOC usage for each day.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

#### D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address 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 responsible official as defined by 326 IAC 2-7-1(34).

## SECTION D.3 FACILITY OPERATION CONDITIONS

### **Emissions Unit Description: Specifically Regulated Insignificant Activities:**

One (1) petroleum fuel (non-gasoline) dispensing facility, with a storage capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. [326 IAC 8-9-1]

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

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

#### **D.3.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]**

- (a) Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), the one (1) petroleum fuel (non-gasoline) dispensing facility is subject to the reporting and record keeping requirements contained in 326 IAC 8-9-6(b)(1)-(3) and is exempt from all other provisions of 326 IAC 8-9.

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

#### **D.3.2 Record Keeping Requirements [326 IAC 8-9-6(a) and (b)]**

- (a) To document compliance with Condition D.3.1, the Permittee shall maintain records for the life of the vessel in accordance with (1) through (3) below.
- (1) The vessel identification number;
  - (2) The vessel dimensions, and
  - (3) The vessel capacity.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

#### **D.3.3 Reporting Requirements [326 IAC 8-9-6(a) and (b)]**

A summary of the information to document compliance with Condition D.3.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit. The report submitted by the Permittee does require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Brandenburg Industrial Service Company  
Source Address: 1 N. Broadway, TS 670, Gary, Indiana 46402  
Mailing Address: PO Box M-908, Gary, Indiana 46401-0908  
Part 70 Permit No.: T 089-25094-00176

**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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Brandenburg Industrial Service Company  
Source Address: 1 N. Broadway, TS 670, Gary, Indiana 46402  
Mailing Address: PO Box M-908, Gary, Indiana 46401-0908  
Part 70 Permit No.: T 089-25094-00176

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, 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
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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**

**Part 70 Quarterly Report**

Source Name: Brandenburg Industrial Service Company  
Source Address: 1 N. Broadway, TS 670, Gary, Indiana 46402  
Mailing Address: PO Box M-908, Gary, Indiana 46401-0908  
Part 70 Permit No.: T 089-25094-00176  
Facility: Paint Booth (Unit 002)  
Parameter: Volatile Organic Compounds (VOC) usage  
Limit: 24.9 Tons per twelve (12) consecutive month period with compliance determined at the end of each month

**YEAR:**

	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  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name:            Brandenburg Industrial Service Company  
 Source Address:        1 N. Broadway, TS 670, Gary, Indiana 46402  
 Mailing Address:       PO Box M-908, Gary, Indiana 46401-0908  
 Part 70 Permit No.:    T 089-25094-00176

**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 "No 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	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

**Technical Support Document (TSD) for a Part 70 Operating Permit**

**Source Background and Description**

<b>Source Name:</b>	<b>Brandenburg Industrial Service Company</b>
<b>Source Location:</b>	<b>1 N. Broadway, TS 670, Gary, Indiana 46402</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>5093 and 1795</b>
<b>Permit No.:</b>	<b>T 089-25094-00176</b>
<b>Permit Reviewer:</b>	<b>Joe Sachse</b>

The Office of Air Quality (OAQ) has reviewed the operating permit application from Brandenburg Industrial Service Company relating to the operation of a stationary scrap steel processing operation.

**History**

On August 2, 2007, Brandenburg Industrial Service Company submitted an application to the OAQ requesting to separate and modify the combined Part 70 Operating Permits for Brandenburg Industrial Service Company and US Steel - Gary Works. Brandenburg Industrial Service Company was issued a Part 70 Operating Permit on June 27, 2006.

**Source Definition**

Brandenburg Industrial Service Company, source ID 089-00176, had previously been permitted as part of the same major source as US Steel - Gary Works, source ID 089-00121. They were issued separate permits solely for administrative purposes. IDEM, OAQ examined whether these two plants should remain combined as one "major source" as defined in 326 IAC 2-7-1(22). In order for these two plants to be considered one major source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code, or one must serve as a support facility for the other; and
- (3) the plants must be located on contiguous or adjacent properties.

Brandenburg Industrial Service Company is an on-site contractor for US Steel - Gary Works that processes scrap steel. Brandenburg Industrial Service Company's revenue from US Steel - Gary Works in 2006 was approximately 7% of its total revenue. From 2003 to 2006, US Steel - Gary Works accounted for less than 17% of Brandenburg Industrial Service Company's total revenue. Most of Brandenburg Industrial Service Company's output goes to sources other than US Steel - Gary Works.

IDEM's Nonrule Policy Document Air-006-NPD states that an on-site contractor is presumed to be part of the primary source if the contractor supplies a majority of its goods or services to the primary source. This presumption may be rebutted by showing that the on-site contractor does not provide a majority of its output to the primary source. Brandenburg Industrial Service Company has demonstrated that it no longer provides a majority of its goods or services to US Steel - Gary Works. US Steel - Gary Works and Brandenburg Industrial Service Company do not have a common owner, and there appears to no longer be any common control.

US Steel - Gary Works has the two digit SIC Code of 33 for Primary Metal Industries. Brandenburg Industrial Service Company has the two digit SIC Code of 50 for Wholesale Trade-durable Goods. Brandenburg Industrial Service Company supplies less than 50% of its output to US Steel - Gary Works. The two plants have different two digit SIC Codes and there is no support relationship. US Steel - Gary Works and Brandenburg Industrial Service Company are located on contiguous properties at 1 N. Broadway in Gary.

IDEM, OAQ finds that Brandenburg Industrial Service Company and US Steel - Gary Works are no longer part of the same major source. Each plant will be permitted as a separate source. Therefore, Brandenburg Industrial Service Company is being issued an initial Title V Permit (Part 70 Operating Permit No. T 089-25094-00176) and U.S. Steel - Gary Works' Part 70 Operating Permit No. T 089-7663-00121 was revised to remove Brandenburg Industrial Service Company, Plant ID 089-00176, located at 1 N. Broadway, Gary, Indiana 46402 from Section A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]. U.S. Steel - Gary Works was issued Second Administrative Amendment No.: T 089-26246-00121 on April 24, 2008.

## **Permitted Emission Units and Pollution Control Equipment**

### **Scrap Iron and Steel Preparation Operations - Unit 001**

- (a) One (1) Scrap Steel Preparation (burning field) process, identified as Unit 001, with a capacity to cut 30 tons per hour of scrap steel using LPG (propane) torches, located inside a building without an outside vent, constructed in 1995.
- (b) One (1) Scrap Preparation (roll burning hood) process, identified as Unit 001, with a capacity to cut 10 tons per hour of steel rolls using LPG (propane) torches, using a dual cyclone and baghouse as control, constructed in 1995, and exhausting to stack 1.
- (c) One (1) scrap cast iron baling operation, identified as Unit 001, with a maximum capacity of 50 tons per hour (a sporadic process done eight (8) to ten (10) hours per week), constructed in 1995.

### **Paint Booth and Blast Booth**

- (a) One (1) paint booth using airless or air atomization spray guns to apply primer and finish coats to metal trailers and lunch boxes, identified as Unit 002, with a maximum paint usage of 3.63 gallons of primer per hour and 1.4 gallons of finish coat per hour, using dry filters as control, constructed in 2002, and exhausting to stacks PBES-01 and PBES-02.
- (b) One (1) enclosed blast booth, identified as Unit 003, equipped with two (2) blast guns, with each having a maximum capacity of 240 square feet of metal per hour and 105.4 pounds of steel grit per minute per nozzle, using dry filters as control, constructed in 2002, and exhausting inside the building.

## **Insignificant Activities**

- (a) One (1) petroleum fuel (non-gasoline) dispensing facility, with a storage capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less. [326 IAC 8-9-1]

## Existing Approvals

Since the issuance of the Part 70 Operating Permit (T 089-8013-00176) on June 27, 2006, the source has constructed or has been operating under the following approvals as well:

- (a) Significant Permit Modification No. (T 089-23501-00176) issued on January 8, 2007.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

## Enforcement Issue

There are no enforcement actions pending.

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 <sup>th</sup> Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O <sub>3</sub>	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005.

Basic nonattainment designation effective federally April 5, 2005, for PM<sub>2.5</sub>.

- (a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.

- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) PM<sub>2.5</sub>

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM<sub>2.5</sub>. 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 nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8<sup>th</sup>, 2008, and effective on July 15<sup>th</sup> 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**  
Lake County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, PM<sub>10</sub>, NO<sub>2</sub>, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	< 250
PM <sub>10</sub>	< 250
PM <sub>2.5</sub>	> 100
SO <sub>2</sub>	< 100
VOC	> 25 and < 100
CO	< 250
NO <sub>x</sub>	< 250

HAPs	tons/year
single HAP	< 10
Combined HAPs	< 25

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM<sub>10</sub>, and PM<sub>2.5</sub> is equal to or greater than 100 tons per year. 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 all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less 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 less than twenty-five (25) tons per year.
- (d) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

### Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

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

Process/ Emission Unit	Potential to Emit (tons/year)						
	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Unit 001	22.53	22.53	22.53	.52	0.00	0.02	0.11
Paint Booth (Unit 002)	8.88	8.88	8.88	0.00	24.90	0.00	0.00
Blast Booth (Unit 003)	29.28	29.28	29.28	0.00	0.00	0.00	0.00
<b>Total</b>	<b>60.69</b>	<b>60.69</b>	<b>60.69</b>	<b>0.00</b>	<b>&lt; 25</b>	<b>0.00</b>	<b>0.00</b>
TV Major	--	250	--	250	25	250	100
PSD Major	250	--	--	--	--	250	--
Emission Offset / Nonattainment NSR	--	--	100	100	25	--	100

\* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>), not particulate matter (PM), is considered as a "regulated air pollutant". U.S. EPA has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is not major for Emission Offset and Nonattainment New Source Review because VOC emissions are less than twenty-five (<25) tons per year, and the emissions of PM<sub>2.5</sub>, SO<sub>2</sub>, and NO<sub>x</sub> are less than one hundred (<100) tons per year.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

### **Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

None of the emission units located at the source has a potential to emit of criteria pollutants equal to or greater than 100 tons per year. The uncontrolled single HAP and combined HAPs are less than 10 and 25 tons per year respectively. Therefore, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-1.1-5 (Nonattainment New Source Review)**

This existing source is not a major stationary source, under nonattainment new source review rules (326 IAC 2-1.1-5), since direct  $PM_{2.5}$  and  $SO_2$  are less than one hundred (< 100) tons per year.

#### **326 IAC 2-3 (Emission Offset Minor Limit)**

Lake County was designated moderate nonattainment for the 8-hour ozone standard in 2004. The VOC emissions from the paint booth, identified Unit 002, together with the VOC emissions from the other emission units, are greater than 25 tons per year. In order to maintain a minor source for emission offset, a federally enforceable VOC limit of less than 25 tons per year for this source is established by this permit.

The VOC input to the paint booth, identified as Unit 002, shall be less than 24.9 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

Compliance with the above VOC limit, in combination with the VOC emissions from the other emission units, shall limit the sourcewide VOC emissions to less than twenty five (25) tons per twelve (12) consecutive month period, and shall render 326 IAC 2-3 (Emission Offset) not applicable to the source.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3, an emission statement must be submitted annually by July 1 and every year after. Therefore, the next emission statement for this source must be submitted by July 1, 2008. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

### 326 IAC 5-1 (Opacity Limitations)

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

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

## State Rule Applicability – Individual Facilities

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

The operation of the paint booth, identified as Unit 002, shall emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

### 326 IAC 6.8-1-2(a) (Particulate Emissions)

Particulate from the Roll Burning Hood, the paint booth, identified as Unit 002, and the Blast Booth, identified as Unit 003, shall be limited to three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

The paint booth, identified as Unit 002, is not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because it is subject to 326 IAC 8-2-9.

### 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 the coating delivered to the applicator at the paint booth, identified as Unit 002, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Compliance with the VOC content limit, shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\sum (C \times U) / \sum U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied; and  
U is the usage rate of the coating in gallons per day.

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 8-9-1 (Volatile Organic Storage Vessels)

Pursuant to 326 IAC 8-9-1 (Volatile Organic Storage Vessels), stationary vessels used to store volatile organic liquids (VOL) that are located in Lake County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the provisions contained in 326 IAC 8-9-1(a) and (b). Therefore, the one (1) petroleum fuel (non-gasoline) dispensing facility is subject to the reporting

and record keeping requirements of 326 IAC 8-9-1(a) and (b) and is exempt from all other provisions of this rule.

### Compliance Determination and Monitoring Requirements

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

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

The testing requirements applicable to this source are as follows:

The Permittee shall conduct PM and PM<sub>10</sub> testing for the enclosed blast booth identified as Unit 003 within 180 days of issuance of this permit, or within sixty (60) days of the resumption of operations at this emission unit, whichever is later, utilizing methods as approved by the Commissioner. This blast booth, constructed in 2002, has not been tested. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM<sub>10</sub> includes filterable and condensable PM<sub>10</sub>. Testing shall be conducted in accordance with Section C- Performance Testing. This test is required to determine compliance with the 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County) grain limit on this emission unit.

The compliance monitoring requirements applicable to this source are as follows:

(a) Baghouse

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse controlling the Scrap Preparation (roll burning hood) process	Water Pressure Drop	Daily	2 to 8 inches	Response Steps

(b) Dry filter

<b>Emission Units</b>	<b>Frequency</b>	<b>Monitoring</b>
Dry filters for the paint booth, identified as Unit 002, and the blast booth, identified as Unit 003	Daily	Inspection shall be performed to verify the placement, integrity, and particle loading of the dry filters.
Dry filters for the paint booth, identified as Unit 002, and the blast booth, identified as Unit 003	Weekly	Observation shall be made of the particulate from the flat spray coating line stack to monitor the performance of the dry filters.
Dry filters for the paint booth, identified as Unit 002, and the blast booth, identified as Unit 003	Monthly	Inspection shall be performed of the particulate emissions from the flat spray coating line stack and the presence of particulate on the rooftops and the nearby ground.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Operating Permit be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on August 2, 2007.

**Conclusion**

The operation of this stationary scrap steel processing operation shall be subject to the conditions of the attached Part 70 Operating Permit No.: T 089-25094-00176.

Company Name: Brandenburg Industrial Service Company  
 Address: One N. Broadway TS 670, Gary, Indiana 46402  
 Part 70 Operating Permit No.: T 089-25094-00176  
 Reviewer: Joe Sachse

**SUMMARY UNCONTROLLED & LIMITED/CONTROLLED PTE**

**Summary Uncontrolled PTE (tons/yr)**

Pollutant	Unit 001 **	Unit 002	Unit 003	TOTAL (tons/yr)
PM	--	88.80	53.67	142.47
PM <sub>10</sub>	1.60E-08	88.80	53.67	142.47
PM <sub>2.5</sub>	--	88.80	53.67	142.47
SO <sub>2</sub>	--	--	--	--
NO <sub>x</sub>	--	--	--	--
VOC	8.20E-06	75.25	--	75.25
CO	0.02	--	--	0.02
total HAPs	--	9.57	--	9.57
Xylene *	--	6.43	--	6.43

Total emissions are based on rated capacities at 8,760 hours/year.

\* Note: Xylene is worst case single HAP

\*\* Note: Unit 001 Uncotrolled Emissions provided by source.

**Summary Limited/Controlled PTE (tons/yr)**

Pollutant	Unit 001	Unit 002	Unit 003	TOTAL (tons/yr)
PM	22.53	8.88	29.28	60.69
PM <sub>10</sub>	22.53	8.88	29.28	60.69
PM <sub>2.5</sub>	22.53	8.88	29.28	60.69
SO <sub>2</sub>	0.52	--	--	0.52
NO <sub>x</sub>	0.11	--	--	0.11
VOC	8.20E-06	24.90	--	24.90
CO	0.02	--	--	0.02
total HAPs	--	9.57	--	9.57
Xylene *	--	6.43	--	6.43

Total emissions are based on rated capacities at 8,760 hours/year.

\* Note: Xylene is worst case single HAP

**Company Name: Brandenburg Industrial Service Company**  
**Address: One N. Broadway TS 670, Gary, Indiana 46402**  
**Part 70 Operating Permit No.: T 089-25094-00176**  
**Reviewer: Joe Sachse**

**Unit 001 (Scrap Iron and Steel Preparation Operations)**  
**Scrap Preparation (roll burning hood) process**

**PM Limited Emissions (326 IAC 6.8-1-2(a):**

air flow rate	20000	cfm
limit	0.03	gr/dscf

$$\text{PM Limited Emissions} = 20,000 \times .03 / 7000 \times 60 = 5.14 \text{ lb/hr}$$
$$= 22.53 \text{ tons/yr}$$

Company Name: **Brandenburg Industrial Service Company**  
 Address: **One N. Broadway TS 670, Gary, Indiana 46402**  
 Part 70 Operating Permit No.: **T 089-25094-00176**  
 Reviewer: **Joe Sachse**

**Paint Booth (Unit 002)**  
**VOC and PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions**

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	VOC PTE pounds per hour	VOC PTE pounds per day	VOC PTE tons per year	PM/PM <sub>10</sub> /PM <sub>2.5</sub> PTE (ton/yr)	Transfer Efficiency
<b>Primer Coat</b>															
DuPont 681-705	11.9	28.7%	0.0%	28.7%	0.0%	51.6%	10.0	0.33	3.40	3.40	11.22	269.30	49.15	67.25	45%
Thinner	6.3	100.0%	0.0%	100.0%	0.0%	0.0%	1.0	0.33	6.33	6.33	2.09	50.13	9.15	0.00	45%
<b>Finish Coat</b>															
Yellow 40P	9.1	37.4%	0.0%	37.4%	0.0%	51.6%	5.3	0.20	3.39	3.39	3.56	85.39	15.58	14.35	45%
Activator	9.4	9.5%	0.0%	9.5%	0.0%	87.0%	1.8	0.20	0.90	0.90	0.31	7.53	1.37	7.20	45%
<b>PTE Before Controls</b>											<b>17.18</b>	<b>412.36</b>	<b>75.25</b>	<b>88.80</b>	
<b>METHODOLOGY</b>											<b>PTE After Controls</b>			<b>8.88</b>	

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)

VOC PTE 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)

PM/PM<sub>10</sub> PTE Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Note: PTE Calculations based on worst case product consisting of metal 3-axle trailers.]

Note: PM/PM<sub>10</sub>/PM<sub>2.5</sub> PTE is calculated using worst case transfer efficiency of 45%. Airless spray guns are used to apply the primer and air atomization spray guns are used to apply the finish coat. The actual transfer efficiencies for these guns may be as high as 50 to 75%.

Note: Control Efficiency = 90%

Company Name: **Brandenburg Industrial Service Company**  
 Address City IN Zip: **One N. Broadway TS 670, Gary, Indiana 46402**  
 Part 70 Operating Permit No.: **T 089-25094-00176**  
 Reviewer: **Joe Sachse**

**Paint Booth (Unit 002)**  
**HAP Emissions**

Material	Density (lb/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % EthylBenzene	Weight % 1,2,4-trimethyl Benzene	Weight % Aliphatic Diisocyanate	Xylene PTE (ton/yr)	Toluene PTE (ton/yr)	Ethyl Benzene PTE (ton/yr)	1,2,4-trimethyl Benzene PTE (ton/yr)	Aliphatic Diisocyanate PTE (ton/yr)
<b>Primer Coat</b>													
DuPont 681-705	11.9	10.0	0.33	3.0%	0.0%	0.6%	0.0%	0.0%	5.14	0.00	1.03	0.00	0.00
Thinner	6.3	1.0	0.33	5.0%	16.0%	1.7%	0.0%	0.0%	0.46	1.46	0.16	0.00	0.00
<b>Finish Coat</b>													
Yellow 40P	9.1	5.3	0.20	2.0%	0.0%	0.4%	0.0%	0.0%	0.83	0.00	0.17	0.00	0.00
Activator	9.4	1.8	0.20	0.0%	0.0%	0.0%	2.0%	0.2%	0.00	0.00	0.00	0.29	0.03
<b>Total Potential Emissions</b>									<b>6.43</b>	<b>1.46</b>	<b>1.35</b>	<b>0.29</b>	<b>0.03</b>

**METHODOLOGY**

HAP PTE (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
 [Note: Calculations based on worst case product consisting of metal 3-axle trailer.]

<b>Total HAPs (tons/yr) = 9.57</b>
------------------------------------

**Company Name: Brandenburg Industrial Service Company**  
**Address: One N. Broadway TS 670, Gary, Indiana 46402**  
**Part 70 Operating Permit No.: T 089-25094-00176**  
**Reviewer: Joe Sachse**

**Blast Booth (Unit 003)**  
**PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions**

Maximum Production Throughput: 2 Blast Guns x 240 sf/hr/gun = 480 sf/hr

**Particulate Emissions From Work Piece:**

	Surface Material Removed:	0.025	lb/sf	
PM/PM <sub>10</sub> from Removed Surface Material =	480 sf/hr x 0.025 lb/sf =	12	lb/hr	
		52.6		tons/yr

**Particulate Emissions From Abrasive Breakdown:**

Abrasive Type:	Steel Grit			
Breakdown Rate =	0.002%			
Throw Capacity =	105.4	lb/min/nozzle =	6324	lb/hr/nozzle
Total Thrown (2 blast guns) =	210.8	lb/min =	12648	lb/hr
PM/PM <sub>10</sub> from Abrasive Breakdown =	Total Thrown (lb/hr) x 0.002% =		0.3	lb/hr
			1.11	
				tons/yr

(Before Controls)

Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions = Emissions From Work Piece + Emissions from Abrasive Breakdown = 53.67 tons/yr

(After Controls)\*

Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions = Total PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (tons/yr) x (1- Control Efficiency) = 5.37 tons/yr

\* Note - PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions controlled by a baghouse with a 90% control efficiency.

This is a more accurate way of calculating the PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from the abrasive blasting of the outer surface of a railcar than using the process weight rate of the railcar.

**Limited Emissions (326 IAC 6.8-1-2(a)):**

number of fans	2			
air flow rate	13500	cfm		
limit	0.03	gr/dscf		

**Limited Emissions = 2 \* 13,500 \* .03 / 7000 \* 60 = 6.69 lb/hr**  
**= 29.28 tons/yr**