



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

TO: Interested Parties / Applicant

DATE: March 31, 2008

RE: Witt Galvanizing / 099-26301-00081

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot12/3/07



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Mr. Tim Harris, Regional Manager
Witt Galvanizing - Plymouth
4454 Steel Place
Cincinnati, OH 45209

March 31, 2008

Re: Registration Notice-Only Change
No. R099-26301-00081

Dear Mr. Harris:

Witt Galvanizing-Plymouth was issued a Registration No. R099-13617-00081 on February 21, 2001, for a stationary hot dip galvanizing operation located at 14531 8 B Road, Plymouth, Indiana. On March 24, 2008, the Office of Air Quality (OAQ) received a letter from the source requesting a correction to the description of the equipment constructed and operated in the initial registration. The plant is not modifying the units or making changes from the original construction. The correction of the description of these units in the registration is considered a notice-only change, pursuant to 326 IAC 2-5.5-6.

- (a)(c) One (1) caustic tank, which has a capacity of 44,000 **16,000** gallons;
- (b)(d) ~~Five (5)~~ **Four (4)** hydrochloric acid pickling tanks (1, 2, 3, 4, & 5 and 4), each has a capacity of 14,000 **16,000** gallons;
- (e) **One (1) hydrochloric acid strip tank, which has a capacity of 16,000 gallons**
- (f) One (1) hydrochloric acid storage tank, which has a capacity of 5,000 gallons;
- (g) **One (1) ferrous chloride storage tank with a capacity of 5,000 gallons;**
- (h) One (1) preflux tank, which has a capacity of 44,000 **16,000** gallons; and
- (i) One (1) zinc kettle, which has a capacity of 650,000 **920,000** pounds of zinc.
- (f)-(a) One (1) natural gas-fired galvanizing kettle, which has a heat input capacity of 25 **9.5** million Btu per hour (MMBtu/hr);
- (g) ~~One (1) natural gas-fired galvanizing caustic burner, which has a heat input capacity of 0.0015 MMBtu/hr;~~
- (h) ~~Galvanizing hot sticks, which has a heat input rated at 0.40 MMBtu/hr; and~~
- (i)-(b) Welding operations, one (1) Metal Inert Gas (MIG) welding, which has a maximum hourly rate of 1 pound per hour, and one (1) welding stick, which has capacity of 6.0 electrode per hour, and an oxyacetylene flame-cutting operation, rated at 20 feet per hour. Welding operations including the oxyacetylene flame-cutting operation are used for maintenance purposes.

The potential emissions of regulated criteria pollutants and hazardous air pollutants are less than the ranges specified in 326 IAC 2-5.5-6(d)(10) and 326 IAC 2-5.5-6(d)(12), respectively. The uncontrolled/unlimited potential to emit of the entire source will continue to be within the threshold levels specified in 326 IAC 2-5.5-1(b)(1). No new state rules are applicable to this source. There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) or National Emission standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this notice-only change.

In addition, IDEM has begun implementing a new procedure and will no longer list the name or title of the Authorized Individual (AI) in registrations. Pursuant to 326 IAC 2-5.5-6, the registration is hereby revised as follows, with deleted language as ~~strikeouts~~ and new language **bolded**:

Registration Annual Notification

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

| | |
|-------------------------------|-----------------------------|
| Company Name: | Witt Galvanizing - Plymouth |
| Address: | 14531 8 B Road |
| City: | Plymouth, Indiana 46563 |
| Authorized individual: | Timothy Harris |
| Phone #: | (513) 871-5700 |
| Registration #: | 099-13617-00081 |
| | |

I hereby certify that Witt Galvanizing - Plymouth is still in operation and is in compliance with the requirements of Registration 099-13617-00081.

| |
|----------------------|
| Name (typed): |
| Title: |
| Signature: |
| Date: |

The source shall continue to operate according to 326 IAC 2-5.5. Please find enclosed the revised registration. A copy of the registration is available on the Internet at:
<http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Janet Mobley, at (800) 451-6027, press 0 and ask for Janet Mobley or extension 4-5373, or dial (317) 234-5373.

Original signed by,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

IC/jm

Attachment: Revised Registration

cc: File - Marshall County
Marshall County Health Department
Air Compliance Section
IDEM Northern Regional Office
Compliance Data Section
Permits Administrative and Development
Billing, Licensing and Training Section



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REGISTRATION OFFICE OF AIR QUALITY

**Witt Galvanizing - Plymouth
14531 8 B Road
Plymouth, Indiana 46563**

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

| | |
|--|----------------------------------|
| Registration No. 099-13617-00081 | |
| Original signed by: Paul Dubenetzky, chief Permits Branch Office of Air Quality | Issuance Date: February 21, 2001 |

First Registration Notice-Only Change No. 099-24024-00081, issued on January 22, 2007

| | |
|--|-------------------------------|
| Second Registration Notice-Only Change No. 099-26301-00081 | |
| Original signed by: Iryn Calilung, Section Chief Permits Branch Office of Air Quality | Issuance Date: March 31, 2008 |

SECTION A

SOURCE SUMMARY

This registration is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a stationary hot dip galvanizing operation.

| | |
|------------------------------|--|
| Source Address: | 14531 8 B Road, Plymouth, Indiana 46563 |
| Mailing Address: | 4454 Steel Place, Cincinnati, Ohio 45209 |
| General Source Phone Number: | 574-935-4500 |
| SIC Code: | 3479 |
| County Location: | Marshall County |
| Source Location Status: | Attainment for all criteria pollutants |
| Source Status: | Registration |

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) natural gas-fired galvanizing kettle, which has a heat input capacity of 9.5 million Btu per hour (MMBtu/hr);
- (b) Welding operations, one (1) Metal Inert Gas (MIG) welding, which has a maximum hourly rate of 1 pound per hour, and one (1) welding stick, which has capacity of 6.0 electrode per hour, and an oxyacetylene flame-cutting operation, rated at 20 feet per hour. Welding operations including the oxyacetylene flame-cutting operation are used for maintenance purposes.
- (c) One (1) caustic tank, which has a capacity of 16,000 gallons;
- (d) Four (4) hydrochloric acid pickling tanks (1, 2, 3, and 4), each has a capacity of 16,000 gallons;
- (e) One (1) hydrochloric acid strip tank, which has a capacity of 16,000 gallons
- (f) One (1) hydrochloric acid storage tank, which has a capacity of 5,000 gallons;
- (g) One (1) ferrous chloride storage tank with a capacity of 5,000 gallons;
- (h) One (1) preflux tank, which has a capacity of 16,000 gallons; and
- (i) One (1) zinc kettle, which has a capacity of 920,000 pounds of zinc.

SECTION B

GENERAL CONDITIONS

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

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

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

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

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM, the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. 099- 13617-00081 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 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, IN 46204-2251

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

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

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 registration:

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

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

The Registrant 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).

SECTION D.1 EMISSION UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) One (1) natural gas-fired galvanizing kettle, which has a heat input capacity of 9.5 million Btu per hour (MMBtu/hr);
- (b) Welding operations, one (1) Metal Inert Gas (MIG) welding, which has a maximum hourly rate of 1 pound per hour, and one (1) welding stick, which has capacity of 6.0 electrode per hour, and an oxyacetylene flame-cutting operation, rated at 20 feet per hour. Welding operations including the oxyacetylene flame-cutting operation are used for maintenance purposes.

(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 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) the PM emissions from the following facilities shall be limited as follows:

| Process/Facility | Process Weight Rate (ton/hr) | Allowable PM Emissions (lb/hr) |
|------------------|------------------------------|--------------------------------|
| Galvanizing | 0.25 | 1.62 |
| Welding | 0.0014 < 0.05 | 0.551 |

Pursuant to 326 IAC 6-3-2(e), the allowable particulate matter emission rate from the following: brazing equipment, cutting torches, soldering equipment, welding equipment with maximum process weight rates less than 100 pounds per hour shall not exceed 0.551 pounds per hour based on the following equation:

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

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

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

| | |
|--------------------------|------------------------------------|
| Company Name: | Witt Galvanizing - Plymouth |
| Address: | 14531 8 B Road |
| City: | Plymouth, Indiana 46563 |
| Phone Number: | 574-935-4500 |
| Registration No.: | 099-13617-00081 |

I hereby certify that Witt Galvanizing - Plymouth is :

- still in operation.
- no longer in operation.
- in compliance with the requirements of Registration No. 099-13617-00081.
- not in compliance with the requirements of Registration No. 099-13617-00081.

I hereby certify that Witt Galvanizing - Plymouth is :

Authorized Individual (typed):

Title:

Signature:

Phone Number:

Date:

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

Noncompliance: