



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: November 26, 2008

RE: AAA Galvanizing - Hamilton / 151-26788-00055

FROM: Matthew Stuckey, 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 according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Tom Ness
AAA Galvanizing-Hamilton
7825 S Homestead Drive
Hamilton, IN 46742

November 26, 2008

Re: 151-26788-00055
Significant Permit Revision to
Minor Source Operating Permit (MSOP) No.
151-23836-00055

Dear Tom Ness:

AAA Galvanizing-Hamilton was issued a MSOP No. 151-23836-00055 on July 5, 2007 for a stationary hot-dip galvanization plant. A letter requesting changes to this permit was received on July 21, 2008. Pursuant to the provisions of 326 IAC 2-6.1-6(i)(1) a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The permit revision consist of removing the hydrochloric acid (HCl) testing condition of the HCl tanks from the permit and changing the name of the source from 'AAA Galvanizing of Hamilton, IN Inc.' to 'AAA Galvanizing-Hamilton'.

All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire MSOP as modified has been provided with this letter.

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 Mehul Sura, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Mehul Sura or extension (4-5377), or dial (317) 234-5377.

Sincerely,

Original Signed By:

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments:

Updated Permit
Technical Support Document
Addendum to the Technical Support Document
PTE Calculations

mns

cc: File – Steuben County
Steuben County Health Department
U.S. EPA, Region V
Northern Regional Office
Air Compliance Inspector
Compliance Data Section
Permits Administration and Development



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

AAA Galvanizing-Hamilton 7825 S. Homestead Drive Hamilton, Indiana 46742

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

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

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

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

First Significant Permit Revision No.: 151-26788-00055	
Issued by: <i>Original Signed By:</i> Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 26, 2008 Expiration Date: July 5, 2012

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SECTION A SOURCE SUMMARY

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

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

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

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

A.2 Emission Units and Pollution Control Equipment Summary

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

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

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

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

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

B.5 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.6 Enforceability

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

B.7 Severability

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

B.8 Property Rights or Exclusive Privilege

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

B.9 Duty to Provide Information

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

B.10 Certification

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

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

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

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
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.12 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) for the source as described in 326

IAC 1-6-2. At a minimum, the PMPs shall include:

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.17 Source Modification Requirement

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

B.18 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

- Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:
- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

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

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

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required

monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

Corrective Actions and Response Steps

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

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

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

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as

practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

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

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

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

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

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

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

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

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

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

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

I hereby certify that AAA Galvanizing-Hamilton
is :

still in operation.

I hereby certify that AAA Galvanizing-Hamilton
is :

no longer in operation.

in compliance with the requirements of
MSOP M151-23836-00055.

not in compliance with the requirements of
MSOP M151-23836-00055.

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

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

Noncompliance:

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

MINOR SOURCE OPERATING PERMIT (MSOP) CERTIFICATION

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

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

AAA Galvanizing-Hamilton
7825 S. Homestead Drive,
Hamilton, IN 46742

Affidavit of Construction

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

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

Further Affiant said not.

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

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

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

My Commission expires:

Signature _____

Name (typed or printed)

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

Addendum to the Technical Support Document (ATSD) for a
Minor Source Operating Permit (MSOP) Renewal

Source Description and Location

Source Name:	AAA Galvanizing-Hamilton
Source Location:	7825 S Homestead Drive, Hamilton, IN 46742
County:	Steuben
SIC Code:	3479
Operation Permit No.:	M151-23836-00055
Operation Permit Issuance Date:	July 5, 2007
Significant Permit Revision No.:	151-26788-00055
Permit Reviewer:	Mehul Sura

Public Notice Information

On October 21, 2008, the Office of Air Quality (OAQ) had a notice published in the Herald Republican, Angola, Indiana stating that IDEM had received an application from AAA Galvanizing-Hamilton located at 7825 S Homestead Drive, Hamilton, Indiana 46742 for a significant permit revision to their MSOP (151-23836-00055) issued on July 5, 2007. The notice also stated that OAQ proposed to issue this significant permit revision and provided information on how the public could review the proposed significant permit revision and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this significant permit revision should be issued as proposed.

On November 17, 2008, a comment was submitted by Mr. Gregory L. Geise, a member of the public. The comment and response to that comment are summarized below.

Comment:

Mr. Geise stated that any water or air pollution could be very detrimental because the plant is located less than 1 mile from the state's third largest lake, quarter mile from the Fish Creek, which holds some endangered mussels and clams, and closed proximity of Hamilton school complex.

Response:

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO₂), particulate matter to a diameter of 2.5 microns (PM_{2.5}), nitrogen oxides (NO_x) and ground level ozone. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set low enough to protect the health of even the most sensitive persons, such as children, the elderly and people with preexisting health conditions, such as asthma, bronchitis and cardiovascular disease. Each NAAQS also has a secondary standard. Secondary standards set limits to protect public welfare, including protection against visibility impairment, damage to animals, crops, vegetation, and buildings. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed

information about the health effects of these six common air pollutants and why they are regulated.

The federal Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS. Steuben County is in attainment for all the National Ambient Air Quality Standards.

IDEM conducts sampling of the ambient air at monitoring stations around Indiana. This air monitoring measures whether the NAAQS are being met. Information about Indiana's air monitoring system and monitoring results is available at <http://www.in.gov/idem>. Information about current and expected air pollution levels is on IDEM's SmogWatch site at <http://www.in.gov/idem> on the internet.

The HCl PTE (Potential to Emit) increase for this source is provided in the Technical Support Document for this significant permit revision. The HCl emissions from the galvanization plant production are released exclusively from the hydrochloric acid tanks. Acid tank emissions were calculated using a report published by The Metal Finishing Association of Southern California (MFASC) titled *Emission Factors for Toxic Air Contaminants of Concern to the Metal Finishing Industry* (April, 1999).

IDEM requires sources to comply with all health-based and technology-based standards established by the U.S. EPA and the Indiana Air Pollution Control Board, including the NAAQS. If an applicant demonstrates that they will be able to comply with all Federal and State laws regarding air pollution, IDEM is required by law to issue an air permit. After reviewing all the data available, IDEM has determined that AAA Galvanizing of Hamilton, IN Inc. will be able to comply with all Federal and State air pollution control laws and therefore, this source pose no threat to the people or environment around the plant.

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

Technical Support Document (TSD) for a Significant Permit Revision to a
Minor Source Operating Permit (MSOP)

Source Description and Location

Source Name: AAA Galvanizing-Hamilton
Source Location: 7825 S Homestead Drive, Hamilton, IN 46742
County: Steuben
SIC Code: 3479
Operation Permit No.: M151-23836-00055
Operation Permit Issuance Date: July 5, 2007
Significant Permit Revision No.: 151-26788-00055
Permit Reviewer: Mehul Sura

On July 21, 2008, the Office of Air Quality (OAQ) has received an application from AAA Galvanizing-Hamilton relating to the removal of the hydrochloric acid (HCl) testing requirement from the permit.

Existing Approvals

The source was issued MSOP No. 151-23836-00055 on July 5, 2007. The source has not received new approval after the MSOP No. 151-23836-00055 was issued.

County Attainment Status

The source is located in Steuben County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

Unclassifiable or attainment effective April 5, 2005, for PM2.5.

(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) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Steuben County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM2.5**
Steuben County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15th, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.
- (c) **Other Criteria Pollutants**
Steuben County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM10, and NO_x. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by AAA Galvanizing-Hamilton on July 21, 2008, relating to the removal of the hydrochloric acid (HCl) testing requirement of the hydrochloric acid tanks from the permit and changing the name of the source from 'AAA Galvanizing of Hamilton, IN Inc.' to 'AAA Galvanizing-Hamilton'.

AAA Galvanizing-Hamilton was given an extension until July 28, 2008 by IDEM, to perform the HCl testing. AAA Galvanizing-Hamilton failed to perform the HCl testing by July 28, 2008. However, AAA Galvanizing-Hamilton submitted the permit revision application before July 28, 2008 to remove the HCl testing condition from the permit.

AAA Galvanizing-Hamilton has submitted the following information to justify why the HCl testing requirement for the HCl tanks is not necessary:

The HCl emission factor, which was used in MSOP No. 151-23836-00055 for determining the HCl PTE of HCl tanks, is derived from a report of the tests conducted by the South Coast Air Quality Management District (SCAQMD) and Metal Finishing Association of Southern California (MFASC) with collaboration by the California Air Resource Board (CARB).

The tests (conducted by the SCAQMD and MFASC) were performed during full scale operation of HCl tanks operating in a normal condition and at average loads, therefore the HCl emission factor is representative of the emission rate of the HCl tanks located at the AAA Galvanizing-Hamilton. However, the report's conclusion states that this emission factor may not be valid for the following scenarios:

- 1) When tank solution temperature is greater than 80 degree Fahrenheit
- 2) When HCl concentration in the tank is greater than 13.2 percent by weight
- 3) When tank solution surface is distributed by air flow such as dedicated ventilated system

IDEM has evaluated each of the above listed scenarios to verify the validity of the emission factor used for the HCl tanks located at the AAA Galvanizing-Hamilton:

- 1) Based on the additional information submitted by AAA Galvanizing-Hamilton on August 12, 2008, the average operating temperature of each of the HCl tanks at the source is approximately 80 degree Fahrenheit.
- 2) The tanks at the source operate at 14 percent by weight HCl concentration. The report suggests that the emission factor increases exponentially if acid concentration level is increased above 13.2 percent by weight, and therefore the emission factor shall be adjusted if acid concentration level is more than 13.2 percent by weight.

The report also includes a graph showing a relationship between HCl emission rate and tank HCl concentration in percent by weight (Figure 9 of the SCAQMD report of the tests conducted at AAA Plating Company, 444 Dixon Street, Compton, CA 90222 (Test Report No. 98-107)). The graph reveals that emission rate with 14% weight concentration is 20% higher than the emission rate with 13.2% weight concentration.

In order to account for the difference 0.8% ($14\% - 13.2\% = 0.8\%$), the emission factor, which was used in MSOP No. 151-23836-00055 to determine the HCl PTE of the tanks, has been increased by 20%. As a result the PTE of the tanks has been increased by 20% due to this significant permit revision. The revised HCl combined PTE of the tanks is now 5.95 tons per year due to this permit revision (previous HCl combined PTE of the tanks was 4.76 tons per year).

- 3) The surface of tanks at the source is open, i.e. these tanks do not have dedicated ventilated system which would otherwise cause increase in HCl emissions due entrainment of the HCl collected inside the duct.

IDEM has determined that data of the report is reliable and representative of the actual operation of the HCl tanks at AAA Galvanizing-Hamilton, and therefore, no HCl testing is needed for the acid tanks. As a result, the HCl testing condition (Condition D.2.1) in the permit will be removed through this permit revision. In addition, the source name will be changed from 'AAA Galvanizing of Hamilton, IN Inc.' to 'AAA Galvanizing-Hamilton' through this permit revision.

Enforcement Issues

- (1) IDEM is aware that the source started the operation of the equipment (listed below and constructed in 2007) without submitting an Affidavit of Construction to IDEM. Therefore, the source has violated the Condition 'B.3 - Affidavit of Construction' of the MSOP No. 151-23836-00055. IDEM is reviewing this matter and will take the appropriate action. This proposed approval is intended to satisfy the requirements of the operation permit rules.
 - (d) One (1) galvanizing kettle (Kettle 23'), constructed in 2007, with a maximum process rate of 20,000 lbs/hr, and exhausting to the atmosphere.
 - (e) Eight (8) hydrochloric acid tanks, constructed in 2007, and exhausting indoors.
- (2) The source failed to perform the HCl testing by July 28, 2008, the extended date for the HCl testing. Therefore, the source has violated the Condition 'D.2.1 - Testing Requirements' of the MSOP No. 151-23836-00055. IDEM is reviewing this matter and will take the appropriate action.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Revision (tons/year)							
	PM	PM10/PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Total of All Acid Tanks	-	-	-	-	-	-	0.95	0.95 (HCl)
Total PTE of Proposed Revision	-	-	-	-	-	-	0.95	0.95

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

This MSOP revision can not be made through a notice-only change because this proposed revision does not meet any of the criteria in 326 IAC 2-6.1-6(d).

This revision is not a modification as pursuant to 326 IAC 1-2-42, because the source is not making any physical change, changing the method of operation, constructing or reconstructing any new emission unit. Therefore, this revision can not be made through minor permit revision as this revision does not meet any of the criteria in 326 IAC 2-6.1-6(g).

This revision is a permit change. Since this permit change can not be made through a notice-only change or minor permit revision, this MSOP revision will be made through a significant permit revision as pursuant to 326 IAC 2-6.1-6(i)(1).

PTE of the Entire Source After Issuance of the MSOP Revision

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10/PM2.5*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	33	33.3	0.04	6.16	0.34	5.18	4.95.9	4.765.71 (HCl)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, 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 of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Total PTE of Entire Source	33	33.3	0.04	6.16	0.34	5.18	5.9	5.71 (HCl)
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10

* Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.

MSOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled potential emissions of the criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

Federal Rule Applicability Determination

There are no new federal rules that are applicable due to this permit revision.

State Rule Applicability Determination

There are no new state rules that are applicable due to this permit revision.

Compliance Determination and Monitoring Requirements

The existing HCl testing condition (Condition D.2.1) in the permit will be removed from the permit due to this revision. The remaining existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M151-23836-00055, issued on July 5, 2007.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
 - (1) The testing condition for the hydrochloric acid tanks has been removed from the permit. Since there are no other applicable requirements in the Section D.2 after the testing condition is removed from Section D.2, the Section D.2 has been removed in its entirety.
 - (2) The source name has been changed from 'AAA Galvanizing of Hamilton, IN Inc.' to 'AAA Galvanizing-Hamilton' through out the permit.

SECTION D.2 EMISSIONS UNITS OPERATION CONDITIONS

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

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

~~(The information describing the process contained in this facility description box is descriptive information~~

~~and does not constitute enforceable conditions.)~~

Compliance Determination Requirements

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

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

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

IDEM Mail Codes

The IDEM address has been updated throughout the permit as follows to include the mail code specific to each section of the Office of Air Quality:

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

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

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

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

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

Conclusion and Recommendation

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 (date). Additional information was received on August 5, 2008.

This proposed revision shall be subject to the conditions of the attached proposed MSOP Significant Revision No. 151-26788-00055. The staff recommends to the Commissioner that this MSOP Significant Permit Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Mehul Sura at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: www.in.gov/idem/permits/air/pending.html.
- (c) 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.in.gov/idem/permits/guide/.

**Appendix A: Emission Calculations
HCl Emissions from the Acid Tanks**

Company Name: AAA Galvanizing-Hamilton
Address: 7825 S. Homestead Dr, Hamilton, IN 46742
Permit Revision No: 151-26788-00055
Reviewer: Mehul Sura
Date: 9/15/2008

Before Permit Revision ^(a)

	Surface Area (ft ²)	HCl Solution (%)	HCl Pickling Factor (lb/(hr-ft ² tank-%HCl))	Emission Rate (lb/hr)	Potential HCl Emissions (tons/yr)
23' Kettle line HCl tanks	966	14	0.00003	0.41	1.78
45' Kettle line HCl tanks	1,620	14	0.00003	0.68	2.98
Total					4.76

After Permit Revision ^(b)

	Surface Area (ft ²)	HCl Solution (%)	HCl Pickling Factor (lb/(hr-ft ² tank-%HCl))	Emission Rate (lb/hr)	Potential HCl Emissions (tons/yr)
23' Kettle line HCl tanks	966	14	0.000036	0.49	2.13
45' Kettle line HCl tanks	1,620	14	0.000036	0.82	3.58
Total					5.71

Acid Tank Specifications

	W (ft)	L (ft)	D (ft)	Surface Area (ft ²)
Six (6) hydrochloric acid tanks, constructed in 2001				
Acid Tank #3	7	23	5.00	161
Acid Tank #4	7	23	5.00	161
Acid Tank #5	7	23	5.00	161
Acid Tank #6	7	23	5.00	161
Acid Tank #7	7	23	5.00	161
Acid Tank #8	7	23	5.00	161
Eight (8) hydrochloric acid tanks, permitted to be constructed in 2007				
Acid Tank #3	6	24	12.50	144
Acid Tank #4	6	24	12.50	144
Acid Tank #5	6	50	12.50	300
Acid Tank #8	6	24	12.50	144
Acid Tank #9	6	24	12.50	144
Acid Tank #10	6	24	12.50	144
Acid Tank #12	6	50	12.50	300
Acid Tank #13	6	50	12.50	300

METHODOLOGY

HCl Emission Factor Before this Permit Revision:

The HCl emission factor, which was used in MSOP No. 151-23836-00055 for determining the HCl PTE of the HCl tanks, was derived from a report of the tests conducted by the South Coast Air Quality Management District (SCAQMD) and Metal Finishing Association of Southern California (MFASC) with collaboration by the California Air Resource Board (CARB). This emission factor was not adjusted to account for the fact that the tanks HCl concentration are higher by 0.8% than the test concentration specified in the MFASC report.

HCl Emission Factor for this Permit Revision:

The HCl emission factor for this permit revision is based on the same source of information as specified above. However, the emission factor has been adjusted to account for the fact that the tanks HCl concentration are higher by 0.8% than the test concentration specified in the MFASC report. For details, please refer 'Description of Proposed Revision' section of this TSD.

Surface Area (ft²) = Length (ft) x Width (ft)

Potential HCl Emissions (tons/yr) = Emission Factor (lb/(hr-ft²tank-%HCl)) x Surface Area (ft²) x HCl Solution (%) x 8760 hr/yr x 1 ton/2000 lbs

Increase in Potential HCl emission due to the permit revision = Potential HCl emission After Permit revision - Potential HCl emission before Permit revision = 5.71 - 4.76 = 0.95