



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: July 11, 2011

RE: Industrial Steel Construction, Inc. / 089-29933-00161

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, 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.



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, Indiana 46404**

(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.

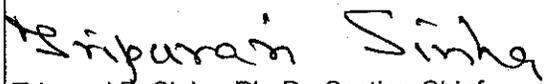
Operation Permit No.: T089-29933-00161	
Issued by:  Tripurari P. Sinha, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 11, 2011 Expiration Date: July 11, 2016

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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 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 miscellaneous metal working and bridge beam fabrication source.

Source Address:	86 North Bridge Street, Gary, Indiana 46404
General Source Phone Number:	219-885-7600
SIC Code:	3441 & 3449
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major 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:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, installed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour;

Annex

- (b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, installed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour;

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1997, exhausting to general ventilation and using no emission control devices;
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, with a maximum capacity of 2.477 pounds of rods per minute;
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a total of forty-nine (49) torches operational;
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18;

- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot;
- (h) One (1) paint booth, identified as EU#22, installed in 2006, painting large steel bridge girders, exhausting to general ventilation and using no emission control devices;
- (i) Submerged arc welding identified as EU #17, installed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year.

Grinding

- (j) One (1) plate sweep grinder, identified as part of EU #11, installed in 1990, with a maximum capacity of 75 square feet of steel per hour;
- (k) Three (3) slab grinders, identified as part of EU #11, installed in 1991, with a maximum capacity of 613,200 tons of slabs per year total;

“A” Building

- (l) One (1) paint booth, identified as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausting through Stack #10;
- (m) One (1) mechanical blaster/blowoff, identified as EU #19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, with a maximum capacity of 700 linear feet of steel plate per hour.

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) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2]

- (e) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding. [326 IAC 6.8-1-2]

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, T089-29933-00161, 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] [IC 13-17-12]

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. 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) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

(c) 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. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) 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, or 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 and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.

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 T089-29933-00161 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 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.16 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, 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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 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 or notice 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.19 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
Permit Administration and Support Section, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.23 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.24 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 5-1-1 (Applicability) and 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Particulate Matter 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 opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (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) Material processing facilities shall include the following:
 - (1) 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.
 - (2) 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.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
 - (5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
 - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
 - (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (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 attached Fugitive Dust Control Plan.

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 by using ambient air quality modeling pursuant to 326 IAC 1-7-4. 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
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 that meets the requirements of 326 IAC 2-7-6(1) by a "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) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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 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.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.

- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
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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) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, installed in 1968, exhausting through Stack #1, with a maximum capacity 720 linear feet of steel plates and shapes per hour;

Annex

- (b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, installed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour.

Girder Shop

- (d) Electric arc stick welding, identified as EU #9, installed in 2001, with a maximum capacity of 2.477 pounds of rods per minute;
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a total of forty-nine (49) torches operational.
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18;
- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot.
- (i) Submerged arc welding identified as EU #17, installed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year.

Grinding

- (j) One (1) plate sweep grinder, identified as part of EU #11, installed in 1990, with a maximum capacity of 75 square feet of steel per hour;
- (k) Three (3) slab grinders, identified as part of EU #11, installed in 1991, with a maximum capacity of 613,200 tons of slabs per year total.

(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.1.1 PSD Minor Limits [326 IAC 2-2]

The Permittee shall comply with the following requirements:

- (a) The PM and PM₁₀ emissions from the mechanical blaster #1, identified as EU #1 shall each not exceed 2.68 pounds per hour.

- (b) The PM and PM₁₀ emissions from the mechanical blaster #4, identified as EU #2 shall each not exceed 0.59 pounds per hour.
- (c) The amount of steel slab from the three (3) slab grinders, identified as EU #11 to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month, and the PM/PM₁₀ emission shall not exceed 0.0493 percent of steel slabs. Compliance with these limits will limit the PM/PM₁₀ emission from the steel slab to be less than 98.6 tons per year.
- (d) The PM and PM₁₀ emissions from the mechanical blaster #3, identified as EU #18 shall each not exceed 0.58 pounds per hour.
- (e) The PM and PM₁₀ emissions from the mechanical blaster #5, identified as EU #21 shall each not exceed 2.57 pounds per hour.

Compliance with these limits in combination with Conditions D.3.1 and Potential PM/PM₁₀ emissions from other emission units will limit the source wide PM and PM₁₀ emissions to less than two hundred fifty (250) tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

D.1.2 Particulate Matter Emission Limitations (PM) [326 IAC 6.8-1-2]

The particulate matter (PM) emissions from the emission units, identified as EU #1, EU #2, EU #9, EU #11, EU #13 EU #18, EU #21, and EU #17 shall not exceed 0.03 grains per dry standard cubic foot, each.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #17, EU#18 and EU #21, and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(5)(c)][326 IAC 2-1.1-11]

In order to determine compliance with Condition D.1.1, the Permittee shall perform PM and PM₁₀ testing on one of the blasters, EU #1, EU #2, (blasters #1 and #4), EU #18 (blaster #3), or EU #21 (blaster #5) utilizing methods as approved by the Commissioner once every five (5) years from the date of the most recent valid compliance demonstration. PM₁₀ includes filterable and condensable PM₁₀. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.5 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses for PM and PM₁₀ control shall be in operation and control emissions from the EU #1, EU #2, EU #18 and EU #21 (blasters #1, #4, #3 and #5) at all times that the blasting processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also

included 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.

- (c) The smoke eliminators associated with the two (2) DB torches in EU #13 shall be in operation at all times that the DB torches are in operation.

D.1.6 Visible Emissions Notations [326 IAC 2-7-6] [40 CFR 64]

- (a) Visible emission notations of the stack exhaust from blaster EU#1, EU,#2, EU#18 and EU#21 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.1.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the blasting processes, at least once per day when the blasting processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses for blasters EU#1 (No. 1 Blaster) is outside the normal range of 2.0 and 6.0 inches of water, for blaster EU#2 (No. 4 Blaster) is outside the normal range of 1.0 and 8.0 inches of water and the normal range of 1.0 and 5.0 inches of water for blasters #3 and #5 (EU#18 & EU#21) or a range established during the latest stack tests, the Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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 or replaced at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection [40 CFR 64]

- (a) For a single compartment baghouse, controlling emissions from a process operated continuously, failed units and the associated process shall 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).

- (b) For a single compartment baghouse, controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, or dust traces.

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.6 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the four (4) blaster, EU#11 and the two (2) DB torch smoke eliminator stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document the compliance status with Condition D.1.7– Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses for units EU#1, EU#2, EU#18 and EU#21. 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).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(c) shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1997, exhausting to general ventilation, and using no emission control devices;
- (h) One (1) paint booth, identified as EU #22, installed in 2006, painting large steel bridge girders, exhausting to general ventilation and using no emission control devices;

“A” Building - Paint Booth identified as EU#20 - Paint Line

- (j) One (1) paint booth, identified as EU#20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausting through Stack #10;

(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 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations):

- (a) The volatile organic compound (VOC) emissions from one (1) paint booth, identified as EU#20 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) The volume weighted average volatile organic compound (VOC) content of coating applied to the two (2) paint booths identified as #15 and #22 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for forced warm air dried coatings.
 - (1) 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 the application equipment during clean up 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.2.2 PSD Minor Limits [326 IAC 2-2]

The Permittee shall comply with the following requirements:

The VOC input to the paint booth, identified as EU#22 shall be less than 197 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with the limit and D.2.1 in combination with potential VOC emissions from other emission units will limit the source wide VOC emissions to less than 250 tons per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

D.2.3 Particulate Matter (PM) [326 IAC 6.8-1-2]

The particulate matter (PM) emissions from the paint booths, identified as EU #15, EU #20 and EU #22, shall not exceed 0.03 grains per dry standard cubic foot, each.

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 device.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Condition D.2.1(a), the Permittee shall operate the thermal oxidizer at all times that the paint booth is in operation.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2(b)]

For paint booth, identified as EU #20:

Compliance with the VOC content and emission limitation shall be determined pursuant to 326 IAC 8-1-2(b), using formulation data supplied by the coating manufacturer.

The equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$
$$= 3.5 / (1 - (3.5 / 7.36)) = 6.67 \text{ lbs VOC/gal coating solids}$$

Where:

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water;
- D= Density of VOC in coating in pounds per gallon of VOC (lbs/gal) as applied; and
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

The emission limit in 326 IAC 8-2-8 is 3.5 pounds of VOC per gallon of coating, less water. The maximum coating density used in the formula for the paint booth, identified as EU #20 is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of lbs VOC/gal coating solid shall be limited to less than 6.67 lbs VOC/gal coating solids.

Pursuant to 326 IAC 8-1-2(c), the overall control efficiency of the thermal oxidizer for EU # 20 shall be no less than the equivalent overall efficiency calculated by the following equation:

$$\begin{aligned} O &= \frac{V - E}{V} \times 100 \\ &= \frac{21.6 - 6.67}{21.6} \times 100 \\ &= 69\% \end{aligned}$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the control device as a percentage.

The overall control efficiency of the thermal oxidizer for the paint booth, identified as EU #20, shall be equal to or greater than 69%.

D.2.7 Volatile Organic Compounds (VOCs)

Compliance with the VOC limitations contained in Conditions D.2.1 and D.2.2 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.

D.2.8 Testing Requirements [326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.2.1, the Permittee shall perform overall VOC control efficiency testing of the thermal oxidizer (3-hour average), temperature and fan amperage utilizing methods as approved by the Commissioner once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.9 Regenerative Thermal Oxidizer Temperature

When operating, the thermal oxidizer shall maintain a minimum 3 hour average temperature as determined in the latest compliance testing to maintain an overall control efficiency of not less than 69% of volatile organic compound (VOC) in order to determine compliance with Conditions D.2.1.

D.2.10 Parametric Monitoring [40 CFR 64]

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. For the purpose of this condition, continuous means no less than once per 15 minutes. The output of this system shall be recorded as a 3-hour average. The Permittee shall operate the thermal oxidizers at or above the 3-hour average temperature as determined in the latest compliance testing.
- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in D.2.1, as approved by IDEM.
- (c) The Permittee shall operate the thermal oxidizer above the 3-hour average temperature as observed during the compliant testing. When for any one reading, the temperature is below the temperature established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C- Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is below the temperature as established in most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from the permit.
- (d) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the minimum established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the minimum established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

D.2.11 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, identified as EU #20 while the booth is in operation. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps 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 these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.12 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, 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 Condition D.2.1.
 - (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 for each month;
 - (5) The total VOC usage for each day and each month.
- (c) To document compliance with Conditions D.2.10, the Permittee shall maintain:
- (1) Continuous temperature records and 3 hour average temperature records.
 - (2) The fan amperage reading.
- (d) To document the compliance status with Condition D.2.11, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its record when an inspection is not taken and the reason for the lack of inspection (e.g. the process did not operate that day).
- (e) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.13 Reporting Requirements

A quarterly summary of the monthly VOC emissions to document the compliance status with Condition D.2.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

“A” Building - Blaster/blowoff, identified as EU#19

- (k) One (1) mechanical blaster/blowoff, identified as EU#19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, with a maximum capacity of 700 lineal feet of steel plate per hour.

(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 PSD Minor Limits [326 IAC 2-2]

The PM and PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU#19, shall each not exceed 1.25 pounds per hour.

Compliance with these limits in combination with Condition D.1.1 and potential PM/PM₁₀ emissions from other emission units will limit the source wide PM and PM₁₀ emissions to less than two hundred fifty (250) tons of per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (PSD) not applicable to this source.

D.3.2 Particulate Matter Emission Limitation (PM) [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Particulate Limitations), PM emissions from the mechanical blaster/blowoff, identified as EU#19 shall not exceed to 0.03 grain per dry standard cubic foot.

D.3.3 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 device.

Compliance Determination Requirements

D.3.4 Particulate Matter (PM)

- (a) In order to comply with Conditions D.3.1 and D.3.2, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster/blowoff, identified as EU#19, at all times that the mechanical blaster/blowoff 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 included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.5 Testing Requirements [326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]

In order to determine compliance with Condition D.3.1, the Permittee shall perform PM and PM₁₀ testing on EU #19 utilizing methods as approved by the Commissioner once every five (5) years from the date of the most recent valid compliance determination. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.3.6 Visible Emissions Notations [326 IAC 2-7-6] [40 CFR 64]

- (a) Visible emission notations of the mechanical blaster/blowoff EU #19 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.3.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per day when the mechanical blaster/ blowoff process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse for mechanical blaster/blowoff is outside the normal range of 1.5 to 6.5 inches of water or a range established during the latest stack tests. The Permittee shall take reasonable response. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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 or replaced at least once every six (6) months.

D.3.8 Broken or Failed Bag Detection [40 CFR 64]

- (a) For a single compartment baghouse, controlling emissions from a process operated continuously, failed units and the associated process shall 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.3.9 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the mechanical blaster/blowoff stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.3.7– Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouse EU#19. 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).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: - Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2]
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total.[326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.[326 IAC 6.8-1-2]
- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2]
- (e) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.[326 IAC 6.8-1-1]

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

- (a) Pursuant to 326 IAC 6.8-1-2(a) (Nonattainment Area Particulate Limitations), PM/PM₁₀ emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment structural steel and bridge fabrication activities and hand grinding, shall be limited to 0.03 grain per dry standard cubic foot.
- (b) Pursuant to 326 IAC 6.8-1-2, the particulate matter emissions from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air.

D.4.2 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (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 PM_{10} 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.

D.4.3 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

The four (4) parts washers, identified as EU #12, are subject to this rule. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.4.4 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Part 70 Permit No.: T089-29933-00161

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 AND ENFORCEMENT 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: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Part 70 Permit No.: T089-29933-00161

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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-29933-00161
Facilities: Three (3) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: Less than 200,000 tons of steel slabs ground per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)	Steel Slabs Ground (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.

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**

Quarterly Report

Source Name: Industrial Steel Construction, Inc.
 Source Address: 86 North Bridge Street, Gary, Indiana 46404
 Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
 Permit No.: T089-29933-00161
 Facility: One (1) paint booth, EU #22
 Parameter: VOC usage, including coatings, dilution solvents delivered to the applicators, and cleaning solvents
 Limit: Less than 197 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

Month	VOC Emitted (tons)	VOC Emitted (tons)	VOC Emitted (tons)
	This Month	Previous 11 Months	12 Month Total

No deviation occurred in this month.

Deviation/s occurred in this month.

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

Source Name: Industrial Steel Construction, Inc.
 Source Address: 86 North Bridge Street, Gary, Indiana 46404
 Part 70 Permit No.: T089-29933-00161

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

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

FUGITIVE DUST CONTROL PLAN

INDUSTRIAL STEEL CONSTRUCTION, INC.
86 North Bridge Street
Gary, IN 46404

Objective:

This plan fulfills the requirements of Industrial Steel Construction, Inc.'s Part 70 permit No. 089-22406-00161 condition C.6. requiring a Fugitive Dust Control Plan written in accordance with 326 IAC 6.8-10-4.

Descriptions of Applicable Operations [326 IAC 6.8-10-4 (3)(B) and (D)]

ISC does not have any outdoor storage piles or material processing or transfer facilities. The following operations generate fugitive emissions.

Emission

<u>Unit</u>	<u>Description</u>
1	Mechanical Blaster
2	Mechanical Blaster
9	Electric Arc Stick Welders
11a	Sweep Grinders
11b	Slab Grinders
13	Cutting Torches
15	Paint Booth
18	Mechanical Blaster
19	Mechanical Blaster
21	Mechanical Blaster
22	Paint Booth
Insignificant Activity	Paved and Unpaved Roads
Insignificant Activity	Disposal of Baghouse Dust and Grinding Swarf

- The mechanical blasters use steel shot to remove scale from steel plate or girders inside an enclosed cabinet controlled by a dust collector. Fugitive dust escapes the cabinet through leaks or when the cabinet's doors are opened. All the mechanical blasters are located indoors and controlled by a baghouse
- Welding, conducted indoors, generates fume as the flux is heated.
- Grinders smooth the surfaces and edges of slabs and plate to improve the quality of the product's surface finish. Grinding is conducted indoors and generates fugitive particulate emissions comprised of grinding wheel dust

- and steel flakes. Most of the particles settle to the floor forming grinding swarf.
- Torches are used to cut steel slabs and plate to the sizes specified by the customer. Torch cutting is located indoors and partially controlled by a baghouse.
- The painting operation coats steel girders inside a building without windows or exhaust vents.
- Vehicles traveling on paved and unpaved roads may generate fugitive emissions. Road lengths and widths can be determined from the drawing in Attachment 1. Table 1 describes estimated vehicle types, weights, and mileage on paved and unpaved roads. The surface silt loadings were estimated from AP-42 tables 13.2.2-1 and 13.2.1.4 in the lower 25 percentile range of iron and steel production facilities because ISC does not use or store granular or dusty materials outdoors like iron and steel facilities. Thus, the silt loadings for paved and unpaved roads were estimated at 4.9% and 9.75%, respectively.

Table 1: Average Mileage on Paved and Unpaved Roads

Type of Vehicle	Estimated Vehicle Weight (tons)	Average Miles Traveled Per Calendar Day	
		Paved Roads	Unpaved Roads
Passenger Vehicle (cars and light duty trucks)	1.5	183	10
Medium duty trucks (eg. fork-lifts)	2	34	1.5
Large Trucks (eg. semi-trailer)	27.5	51	0.5

- Baghouse dust is collected from the mechanical blaster baghouses and torch cutting filters. The dust drops from baghouse hoppers into enclosed rolloff-boxes or drums.

Control Measures [326 IAC 6.8-10-4 (3)(E) and (F)]

Control measures and practices that ISC implements to achieve compliance with fugitive emission rules in 326 IAC 6.8 are listed below. There are not any conditions that will prevent control measures and practices from being applied.

- ISC always operates the mechanical blaster baghouses while the mechanical blasters are operating to minimize fugitive emissions.
- Welding, grinding and painting are performed inside the building to minimize fugitive emissions. Preventive maintenance is performed in accordance with ISC's preventive maintenance plan to ensure normal equipment operation.

- Filters for the DB torches are checked daily when the DB torches are operating in accordance with the Part 70 permit. Torch cutting is performed indoors to minimize fugitive emissions. Preventive maintenance is performed in accordance with ISC's preventive maintenance plan to ensure normal equipment operation.
- Fugitive dust from traffic driving on paved and unpaved roads is minimized by storing raw materials, excluding steel plate, indoors.
- Fugitive dust that could potentially be generated by transferring baghouse dust into roll-off boxes is minimized by filling roll-off boxes within an enclosure or filling drums through a connecting hose.
- Grinding swarf is placed into roll-off boxes indoors to minimize fugitive emissions.

Source Map [326 IAC 6.8-10-4 (3)(C)]

Attachment 1 contains a map showing the locations of paved and unpaved roads, parking lots, dust handling equipment, and waste disposal and reclamation points. ISC does not have any outdoor storage piles, material processing facilities, or material transfer points.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Description and Location

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, IN 46404
County:	Lake
SIC Code:	3441, 3449
Permit Renewal No.:	T089-29933-00161
Permit Reviewer:	Heath Hartley

Public Notice Information

On May 20, 2011, the Office of Air Quality (OAQ) had a notice published in The Post Tribune and The Times in Merrillville and Munster Indiana, Indiana, stating that the Industrial Steel Construction, Inc. had applied for a Part 70 Operating Permit Renewal. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Other Changes

Upon further review, the OAQ has decided to make the following revisions to the permit:

Change No. 1:

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:

.....

- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The ~~new~~ blaster would clean scale from steel girders using steel shot;

.....

D.1.1 PSD Minor Limits [326 IAC 2-2]

The Permittee shall comply with the following requirements:

.....

Compliance with these limits in combination with Conditions ~~D.2.2~~, D.3.1 and Potential PM/PM₁₀ emissions from other emission units will limit the source wide PM and PM₁₀ emissions to less than two hundred fifty (250) tons ~~of~~-per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this source.

.....

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #17, **EU #18** and EU #21, and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

.....

D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Pursuant to 326 IAC 8-1-2(a) and to comply with Conditions D.2.1(a) ~~and D.2.2(b)~~, the Permittee shall operate the thermal oxidizer at all times that the paint booth is in operation.

.....

D.2.8 Testing Requirements [326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]

In order to determine compliance with Conditions D.2.1 ~~and D.2.2~~, the Permittee shall perform overall VOC control efficiency testing of the thermal oxidizer (3-hour average), temperature and fan amperage utilizing methods as approved by the Commissioner once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.2.9 Regenerative Thermal Oxidizer Temperature

When operating, the thermal oxidizer shall maintain a minimum 3 hour average temperature as determined in the latest compliance testing to maintain an overall control efficiency of not less than 69% of volatile organic compound (VOC) in order to determine compliance with Conditions D.2.1 ~~and D.2.2~~.

D.2.10 Parametric Monitoring [40 CFR 64]

.....

- (d) The fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. When for any one reading, the fan amperage is outside the ~~normal range~~ **minimum** established in most recent compliant stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A reading that is outside the ~~range~~ **minimum** established in the most recent compliant stack test is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

.....

D.3.1 PSD Minor Limits [326 IAC 2-2]

The PM and PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU#19, shall each not exceed 1.25 pounds per hour.

Compliance with these limits in combination with Conditions D.1.1, ~~D.2.2~~ and potential PM/PM₁₀ emissions from other emission units will limit the source wide PM and PM₁₀ emissions to less than two hundred fifty (250) tons of per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (PSD) not applicable to this source.

.....

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

Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-~~22406~~ 29933-00161

.....

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Mailing Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-~~22406~~ 29933-00161

IDEM Contact

Questions regarding this proposed permit can be directed to Heath Hartley at the Indiana Department Environmental Management, Office of Air Quality, MC 61-53, Room 1003, 100 North Senate Avenue, Indianapolis, Indiana 46204-2251 or by telephone at (317) 232-8217 or toll free at 1-800-451-6027 extension 2-8217.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description
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Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, IN 46404
County:	Lake
SIC Code:	3441, 3449
Permit Renewal No.:	T089-29933-00161
Permit Reviewer:	Heath Hartley

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Industrial Steel Construction, Inc. relating to the operation of a miscellaneous metal working and bridge beam fabrication source. On November 24, 2010, Industrial Steel Construction, Inc. submitted an application to the OAQ requesting to renew its operating permit. Industrial Steel Construction, Inc. was issued a its Part 70 Operating Permit T089-22406-00161 on August 4, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

#1 Blaster Conveyor Line

- (a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, installed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour;

Annex

- (b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, installed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour;

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1997, exhausting to general ventilation and using no emission control devices;
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, with a maximum capacity of 2.477 pounds of rods per minute;
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a total of forty-nine (49) torches operational;
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18;
- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The new blaster would clean scale from steel girders using steel shot;

- (h) One (1) paint booth, identified as EU#22, installed in 2006, painting large steel bridge girders, exhausting to general ventilation and using no emission control devices;
- (i) Submerged arc welding identified as EU #17, installed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year.

Grinding

- (j) One (1) plate sweep grinder, identified as part of EU #11, installed in 1990, with a maximum capacity of 75 square feet of steel per hour;
- (k) Three (3) slab grinders, identified as part of EU #11, installed in 1991, with a maximum capacity of 613,200 tons of slabs per year total;

“A” Building

- (l) One (1) paint booth, identified as EU #20, equipped with HVLP and/or airless applicators and dry filters for PM overspray, equipped with a natural gas-fired regenerative thermal oxidizer, identified as RTO 100, rated at 1.5 million British thermal units per hour, installed in 2001, exhausting through Stack #10;
- (m) One (1) mechanical blaster/blowoff, identified as EU #19, equipped with a baghouse identified as #19, exhausting through Stack #9, installed in 2001, with a maximum capacity of 700 linear feet of steel plate per hour.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:
 - (1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, installed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2]
 - (2) Sixty-one (61) space heaters, identified as EU #8, rated at 14.2 million British thermal units per hour total.
 - (3) Four (4) preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total.
 - (4) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.
 - (5) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, exhausted through Stack #10, to be installed in 2001.
- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

- (2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2]
- (e) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding. [326 IAC 6.8-1-2]
- (f) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (g) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (i) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (j) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (k) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (l) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (m) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment.
- (n) Closed loop heating and cooling systems.
- (o) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (p) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (q) Paved and unpaved roads and parking lots with public access.
- (r) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

- (s) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (t) On-site fire and emergency response training approved by the department.
- (u) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.

Building C

- (v) Two (2) stills, installed on August 1 and October 11, 2005, capacities 3 and 7 gallons of reclaimed solvents located in Building C.

Girder Shop

- (w) Submerged arc welding, identified as EU #17, installed in 1994, capacity: 18.25 tons of wire per month total or 219 tons of wire per year located in the Girder Shop.

Existing Approvals

Since the issuance of the Part 70 Operating Permit (089-22406-00161) on August 4, 2006, the source has constructed or has been operating under the following additional approvals:

- (a) Significant Source Modification No. 089-23141-00161 issued on November 21, 2006;
- (b) Significant Permit Modification No. 089-23325-00161 issued on December 8, 2006;
- (c) Significant Permit Modification No. 089-26446-00161 issued on August 26, 2008; and
- (d) Administrative Amendment No. 089-26986-00161 issued on September 17, 2008.

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 ₂	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 th 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 ₃	Attainment effective May 11, 2010, for the 8-hour ozone standard. ¹
PM ₁₀	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 ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3.

Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

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

- (b) **PM_{2.5}**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit 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_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ 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 SO₂, CO, PM₁₀, NO₂, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	2163
*PM ₁₀	2163
PM _{2.5}	2163
SO ₂	0
VOC	341
CO	8
NO _x	10
Hexane	6.6
Total HAP	21.1
negl. = negligible	
*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 ₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".	

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM₁₀ and VOC is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit of each criteria pollutant is <100 tons per year, the potential to emit any single HAP is <10 tons per year, and the potential to emit any combination of HAP is <25 tons per year. Therefore the source is an Area Source for HAPs.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2009 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM ₁₀	10
PM _{2.5}	8
SO ₂	0
VOC	18
CO	0
NO _x	0
Lead	0
Ammonia	0

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met 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 new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, 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 Renewal (tons/year)								
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Blaster EU #1	11.6	11.6	587	0	0	0	0	0	0
Blaster EU #2	2.6	2.6	128	0	0	0	0	0	0
Blaster #3 EU#18	2.5	2.5	126	0	0	0	0	0	0
Blaster EU # 19	5.5	5.5	273	0	0	0	0	0	0
Blaster 5 EU#21	11.3	11.3	631	0	0	0	0	0	0
Stick welding EU# 9	12	12	12	0	0	0	0	0	0
Grinder EU#11	30.4	30.4	30.4	0	0	0	0	0	0
Slab Grinders EU#11	98.6	98.6	302	0	0	0	0	0	0
Cutting EU#13	44	44	44	0	0	0	0	0	0
welding EU#17	8	8	8	0	0	0	0	2.4	0
Part Washers EU# 12	0	0	0	0	0	2	0	0	0
Paint Booth EU#15	2	2	2	0	0	19	0	18	6.4
Paint Booth EU#20	2.7	2.7	2.7	0	0	30	0		
Paint Booth EU#22	16.1	16.1	16.1	0	0	< 197	0		
Combustion units	1	1	1	0	10	1	8	0.2	0.2
Total PTE of Entire Source	248	248	2163	negl.	10	< 250	8	21	7
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	NA	NA	250	250	250	NA	NA
Nonattainment NSR Major Source Thresholds	NA	NA	100	100	NA	NA	NA	NA	NA

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

- (b) This existing stationary source is major for Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5}, are greater than one hundred (>100) tons per year.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets 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.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
EU #1 - PM ₁₀	Baghouse	Y	587	11.6	100	Y	N
EU #1 - PM	Baghouse	Y	587	11.6	100	Y	N
EU #2 - PM ₁₀	Baghouse	Y	128	2.6	100	Y	N
EU #2 - PM	Baghouse	Y	128	2.6	100	Y	N
EU #18 - PM ₁₀	Baghouse	Y	126	2.5	100	Y	N
EU #18 - PM	Baghouse	Y	126	2.5	100	Y	N
EU #19 - PM ₁₀	Baghouse	Y	273	5.5	100	Y	N
EU #19 - PM	Baghouse	Y	273	5.5	100	Y	N
EU #21 - PM ₁₀	Baghouse	Y	563	11.3	100	Y	N
EU #21 - PM	Baghouse	Y	563	11.3	100	Y	N
EU #11 - PM ₁₀	None	Y	332	129	100	N	N
EU #11 - PM	None	Y	332	129	100	N	N
EU#22 - VOC	RTO	Y	288	14.4	100	Y	N
EU#22 - PM	Dry filters	Y	16.1	16.1	100	N	N
EU#22 - HAPs	RTO	N	N/A	N/A	100	N	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to EU#1, EU#2, EU#18, EU#19, EU#21, EU#11 for PM/PM₁₀ and EU#22 for VOC. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

- (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 renewal.

State Rule Applicability - Entire Source

326 IAC 2-1.1-5 Nonattainment NSR

The existing source is a major stationary source under Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5} is greater than one hundred (>100) tons per year.

326 IAC 2-2 (PSD)

Blasters

- (a) The PM and PM₁₀ emissions from the mechanical blaster #1, identified as EU #1 shall each not exceed 2.68 pounds per hour.
- (b) The PM and PM₁₀ emissions from the mechanical blaster #4, identified as EU #2 shall each not exceed 0.59 pounds per hour.
- (c) The amount of steel slab from the three (3) slab grinders, identified as EU #11 to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month, and the PM/PM₁₀ emission shall not exceed 0.0493 percent of steel slabs. Compliance with these limits will limit the PM/PM₁₀ emission from the steel slab to be less than 98.6 tons per year.
- (d) The PM and PM₁₀ emissions from the mechanical blaster #3, identified as EU #18 shall each not exceed 0.58 pounds per hour.
- (e) The PM and PM₁₀ emissions from the mechanical blaster #5, identified as EU #21 shall each not exceed 2.57 pounds per hour.
- (f) The PM and PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU#19, shall each not exceed 1.25 pounds per hour.
- (e) The VOC input to the paint booth, identified as EU#22 shall be less than 197 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits in combination with Conditions D.2.2, D.3.1 and Potential PM/PM₁₀ emissions from other emission units will limit the source wide PM, PM₁₀ and VOC emissions to less than two hundred fifty (250) tons of per twelve (12) consecutive month period and render 326 IAC 2-2 (PSD) not applicable to this 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 pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ are less than 250 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted by July 1, 2011, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(2)

State Rule Applicability – Individual Facilities

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

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

326 IAC 6.8 PM Limitations Lake County

This source is subject to 326 IAC 6.8 because it is located in Lake County, its PM PTE (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.8. Therefore, 326 IAC 6.8-1-2(a) applies.

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

(a) Paint booth EU#20 is subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day, and it coats metal parts.

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 spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Pursuant to 326 IAC 8-1-2 (b), the (facility) VOC emissions shall be limited to no greater than the equivalent emissions, expressed as pounds of VOC per gallon of coating solids, allowed in (a).

This equivalency was determined by the following equation:

$$E = L / (1 - (L/D))$$

Where

- L= Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating;
- D= Density of VOC in coating in pounds per gallon of VOC; (7.36)
- E= Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.

Actual solvent density shall be used to determine compliance of the surface coating operation using the compliance methods in 326 IAC 8-1-2(a).

The pounds of VOC per gallon of coating solids shall be limited to less than 6.64.

Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

$$O = \frac{V - E}{V} \times 100$$

Where:

- V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied. (21.6)
- E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.
- O = Equivalent overall efficiency of the capture system and control device as a percentage.

The overall efficiency of the thermal oxidizer shall be greater than 69%.

- (b) Paint booth EU#15 and EU#22 are subject to 326 IAC 8-2-9 because it was constructed after July 1, 1990, its actual before control emissions are greater than fifteen (15) pounds per day, and it coats metal parts.

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 spray booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Compliance with the VOC content limit in condition D.2.1 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:

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

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 8-3 (Organic Solvent Degreasing Operations)

The degreasing operations were constructed after January 1, 1980, therefore the requirements of 326 IAC 8-3-2 apply to the insignificant degreasing operations. The cold cleaner was also constructed after January 1, 1990, and does not have a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-5 are applicable.

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

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
EU #1, EU #2, EU #18, & EU #21	Baghouse	Every 5 years	PM/PM ₁₀	Every 5 years
Paint Booth EU #20	Thermal Oxidizer	Every 5 years	VOC	Every 5 years
Blaster EU#19	Baghouse	Every 5 years	PM/PM ₁₀	Every 5 years

The baghouses must be tested in order to demonstrate compliance with each 326 IAC 2-2 limit. The RTO must be tested to demonstrate compliance with 326 IAC 8-2-9.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouses for EU#1, EU#2, EU#18, EU#21 and EU#11	Visible Emissions	Daily	Normal-Abnormal	Response Steps
	Water Pressure Drop		EU1: 2 - 6 inches EU2: 1 - 8 inches EU18, EU21: 1 - 5 Inches	
Thermal Oxidizer EU#20	Oxidizer Temperature	Continuous / Hourly Average	Temperature from latest IDEM approved stack test	Response Steps
	Fan Amperage	Daily	Range from latest IDEM approved stack test	
Dry Filters for EU#20	Filters and over spray	Daily	Inspection shall be perform to verify the placement, integrity, and particle loading of the dry filters.	Response Steps
		Weekly	Observation shall be made of the over spray from the spray booth stack to monitor the performace of the dry filters	
		Monthly	Inspection shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground.	
Bagouses for EU#19	Water Pressure Drop	Daily	1.5 to 6.5 inches	Response Steps
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because:

1. The baghouses for the blasters EU#1, EU#2, EU#18, EU#21, EU#11 and EU#19 must operate properly to ensure compliance with 325 IAC 2-2, 326 IAC 6.8-1-2 and 40 CFR 64.
2. The smoke eliminators for the EU#13 must operate properly to ensure compliance with 326 IAC 6.8-1-2.
3. The thermal oxidizer for EU#20 must operate properly to ensure compliance with 326 IAC 8-1-2.
4. The dry filters for EU#20 must operate properly to ensure compliance with 326 IAC 6.8.

Recommendation

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

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

An application for the purposes of this review was received on November 24, 2011.

Conclusion

The operation of this miscellaneous metal working and bridge beam fabrication source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-29933-00161.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Heath Hartley 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) 232-8217 or toll free at 1-800-451-6027 extension.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (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.idem.in.gov

Appendix A: Emissions Calculations

Emission Summary

Source Name: Industrial Steel Construction, Inc

Source Location: 86 North Bridge Street, Gary, IN 46404

Permit Number: T 089-29933-00161

Permit Reviewer: Heath Hartley

App. Date: 11/24/2010

Uncontrolled Potential Emissions

Emission Unit	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Hexane (tons/yr)	Total HAPs (tons/yr)
Mechanical Blaster EU #1	587	587	587	0	0	0	0	0	0
Mechanical Blaster EU #2	128	128	128	0	0	0	0	0	0
Blaster #3 EU#18	126	126	126	0	0	0	0	0	0
Mech. Blaster/Blowoff EU # 19	273	273	273	0	0	0	0	0	0
Mechanical Blaster 5 EU#21	631	631	631	0	0	0	0	0	0
Electric Arc Stick welding EU# 9	12	12	12	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30	30	30	0	0	0	0	0	0
Slab Grinders EU#11	302	302	302	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44	44	44	0	0	0	0	0	0.2
Submerged Arc welding EU#17	8	8	8	0	0	0	0	0	2.4
Part Washers EU# 12	0	0	0	0	0	2	0	0	0.0
Paint Booth EU#15	2	2	2	0	0	19.5	0	6.41	18.2
Paint Booth EU#20	3	3	3	0	0	30	0		
Paint Booth EU#22	16	16	16	0	0	288	0		
Combustion units	0	1	1	0	10	1	8	0.18	0.2
Total Emissions	2163	2163	2163	0	10	341	8	6.6	21.1

Appendix A: Emissions Calculations

Emission Summary

Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Permit Reviewer: Heath Hartley
Date: 11/24/2010

Limited Potential Emissions

Emission Unit	PM (tons/yr)	PM₁₀ (tons/yr)	PM_{2.5} (tons/yr)	SO₂ (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)	Hexane (tons/yr)	HAPs (tons/yr)
Mechanical Blaster EU #1	11.7	11.7	586.8	0	0	0	0	0	0
Mechanical Blaster EU #2	2.6	2.6	128.4	0	0	0	0	0	0
Blaster #3 EU#18	2.5	2.5	126.1	0	0	0	0	0	0
Mech. Blaster/Blowoff EU #19	5.5	5.5	272.7	0	0	0	0	0	0
Mechanical Blaster 5 EU#21	11.3	11.3	630.7	0	0	0	0	0	0
Electric Arc Stick welding EU# 9	12.0	12.0	12.0	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30.4	30.4	30.4	0	0	0	0	0	0
Slab Grinders EU#11	98.6	98.6	302.3	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44	44	44.4	0	0	0	0	0	0
Submerged Arc welding EU#17	8	8	7.9	0	0	0	0	0	2.43
Part Washers EU# 12	0	0	0.0	0	0	2	0	0	0.0
Paint Booth EU#15	2	2	2.0	0	0	19	0	6.41	18.2
Paint Booth EU#20	2.7	2.7	2.7	0	0	30	0		
Paint Booth EU#22	16.1	16.1	16.1	0	0	< 197	0		
Combustion units	0	0	0.8	0	10	0.5	8.3	0.18	0.18
Total Emissions	247.9	247.9	2163	0.1	10	< 250	8	7	Single HAP <10 Combined HAPs < 25

Appendix A: Emissions Calculations

Blasters

Company Name: Industrial Steel Construction, Inc

Address: 86 North Bridge Street, Gary, IN 46404

Permit: T 089-29933-00161

Reviewer: Heath Hartley

Date: 11/24/2010

Potential To Emit PM/PM10					Controlled	326 2-2	Limited	
Unit ID/Emission Unit		Outlet Grain Loading (gr/dscf)	Air Flow (dscf/min)	Control Efficiency %	PTE (ton/yr)	tpy	lb/hr	ton/yr
EU #1	Blaster 1	0.02	15630	98%	587	11.74	2.68	11.74
EU #2	Blaster 4	0.02	3419	98%	128	2.57	0.59	2.58
EU #18	Blaster 3	0.006	11200	98%	126	2.52	0.58	2.54
EU #19	Blaster/Blowoff	0.005	29052	98%	273	5.45	1.25	5.48
EU #21	Blaster 5	0.0056	30000	99%	631	6.31	2.57	11.26
Total					1745			

Methodology

PTE (ton/year) = Grain Loading (gr/dscf) * Air Flow (dscf/min) * 60 minutes/hr * 1lb/7000 grains * 8760 hour/yr * 1 ton/2000 lb / (1-CE%/100)

Electric Arc Welding Stick

Unit ID	No of Welders	Max. Weld Rate (rod/min)	Max. Rod (weight (oz))	PM/PM10 (lb/1000lb of rod)	PM/PM10 (tons/yr)
EU #9	12	0.718	4.6	18.4	12.0

Methodology

Uncontrolled PM emissions (tons/yr) = Max.weld rate (rod/mim) x Max. Rod Weight (oz) x 1lb/16oz x lb PM/1000 lb of rod x No. of welders x 60 min/hr x 8760 hr/yr x 1ton/2000lb

EU # 11 (Sweep Grinder)

Unit ID	Max. Area of Steel Swept (sq ft/hr)	Max. lb PM/ft sq of Area Swept*	Hours of operation/ yr	Uncontrolled PM/PM10 (tons/yr)
EU # 11	75	0.0925	8760	30.4

Methodology

Uncontrolled PM/PM10 (tons/yr) = Max.Area of steel swept (ft/hr) x Max. lb PM/ft of area swept x Hours of operations/yr x 1ton/ 2000lb

EU #11 (3 Slab Grinders)

Unit ID	Max. Grind Capacity (ton/yr)	PM emitted from Grinding operation (%)*	Uncontrolled PM/PM10 (tons/yr)	Limit tpy
EU #11	613200	0.0493	302.3	200000 98.60

Methodology

Uncontrolled PM/PM10 emissions(tons/yr) = Max.Grind Capacity (ton/yr) x PM emitted from grinding operation in %

* Provided by the source

**Appendix A: Emissions Calculations
Thermal Cutting**

Company Name: Industrial Steel Construction, Inc
Address City IN Zip: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Reviewer: Heath Hartley
Date: 11/24/10

EU # 13 (Oxy methane Cutting Torches)

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr	
FLAME CUTTING												
Oxyacetylene	40	3.375	7	0.1622	0.0005	0.0001	0.0003	9.197	0.028	0.006	0.017	0.051
Oxymethane	7	9.1	3	0.0815	0.0002	--	0.0002	0.934	0.002	0.000	0.002	0.005
Plasma**	2	12	9.4	0.0039				0.004	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								10.14				0.06
Potential Emissions tons/year								44				0.2

METHODOLOGY

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in calculating the emissions.

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Appendix A: Emissions Calculations

Welding

Company Name: Industrial Steel Construction, Inc
Address City IN Zip: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Reviewer: Heath Hartley
Date: 11/24/2010

EU #17 (Surmerged Arc Welders)

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	12	4.2	0.036	0.011			1.814	0.554	0.000	0	0.554
Metal Inert Gas (MIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
Stick (E7018 electrode)	0	0	0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
EMISSION TOTALS											
Potential Emissions lbs/hr							1.81				0.55
Potential Emissions tons/year							8				2.4

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lb

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

Company Name: Industrial Steel Construction, Inc
Address City IN Zip: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Reviewer: Heath Hartley
Date: 11/24/2010

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU #15 Solvent	7.4	16.0%	0%	16.0%	0%	0%	3.760	1	1.18	1.18	4.45	19.50	2.00	#DIV/0!	98%
EU # 20 GTA cleaner	6.9	100.0%	0%	100.0%	0%	0%	0.061	1	6.93	6.93	0.42	1.85	0.00	#DIV/0!	100%
EU #20 997 Primer	7.5	72.3%	0%	72.3%	0%	25%	1.200	1	5.40	5.40	6.48	28.39	2.72	21.60	75%
EU #22 Paint	7.4	47.3%	0%	47.3%	0%	0%	18.800	1	3.50	3.50	65.80	288.22	16.06	#DIV/0!	95%
												338	21		

State Potential Emissions

Add worst case coating to all solvents

Uncontrolled VOC Emission EU #20 30.24
Controlled VOC Emission EU #20 (95% eff) 1.51
Controlled PM Emission EU #20 (40% Eff.) 1.63

METHODOLOGY

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

Potential VOC (tpy) = (pounds VOC/ Gallon coating) x (gal. of Material/unit) x Max. units/hr) x (8760 hr/yr) x (1 ton/2000lb)

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: Industrial Steel Construction, Inc
Address City IN Zip: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Permit Reviewer: Heath Hartley
Date: 11/24/2010

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Formaldehyde	Weight % Benzene	Weight % Hexane	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Formaldehyde Emissions (ton/yr)	Benzene Emissions (ton/yr)	Hexane Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	Methanol Emissions (ton/yr)
Paint Booths																	
GTA 840 Cleaner	6.93	0.10000	1.000	50.00%	20.00%	0.00%	20.00%	0.00%	20.00%	0.00%	1.52	0.61	0.00	0.61	0.00	0.61	0.00
#997 Nippe Ceramo Primer	7.47	1.96000	1.000	0.00%	10.00%	0.00%	1.00%	10.00%	5.00%	0.00%	0.00	6.41	0.00	0.64	6.41	3.21	0.00
"Worst Case" Individual HAP											1.5	6.4	0.0	0.6	6.41	3.2	0.00
"Worst Case" Total HAPs											18.2						

METHODOLOGY

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

**Appendix A: Emission Calculations
Natural Gas Combustion Units**

Company Name: Industrial Steel Construction, Inc
Address: 86 North Bridge Street, Gary, IN 46404
Permit: T 089-29933-00161
Reviewer: Heath Hartley
Date: 11/24/2010

Unit	Capacity
EU#7 boiler	1.8
EU#8 61 space heaters	14.2
EU#14 4 torches	1.2
N/A 1 cure oven	1.4
N/A 1 preheat oven	2.58
therm oxidizer	1.5
Total	22.68

Total Heat Input Capacity MMBtu/hour	Potential Throughput MMCF/year
22.7	198.7

Pollutant

	* PM	* PM10	SO ₂	** NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	0.6	100	5.5	84.0
Potential To Emit (tons/year)	0.2	0.8	0.1	9.9	0.5	8.3

*PM and PM10 emission factors are filterable and condensable PM and PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100 lb/MMCF.

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu

Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton//2000 lbs

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
Boilers**

Company Name: Industrial Steel Construction, Inc
Location: 86 North Bridge Street, Gary, IN 46404
TVOP: T 089-29933-00161
Reviewer: Heath Hartley
Date: 11/24/2010

HAPs - Organics

Emission Factor (lb/MMCF)	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential To Emit (tons/year)	2.09E-04	1.19E-04	7.45E-03	1.79E-01	3.38E-04

HAPs - Metals

Emission Factor (lb/MMCF)	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	Total HAPs 0.19
Potential To Emit (tons/year)	4.97E-05	1.09E-04	1.39E-04	3.77E-05	2.09E-04	

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors as provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Insignificant Activities**

Company Name: Industrial Steel Construction, Inc
Plant Location: 86 North Bridge Street, Gary, IN 46404
Permit Number: T 089-29933-00161
Permit Reviewer: Heath Hartley
Date: 11/24/2010

Emission Unit	Maximum Capacity (gal/yr)	Emission Factor (lb/gal)	Emission Factor (lb/ton)	Source of Emission Factor	Control Effy %	Capture Ef %	Potential Emissions					
							PM (Tons/Year)	PM10 (Tons/Year)	SOx (Tons/Year)	NOx (Tons/Year)	VOC (Tons/Year)	CO (Tons/Year)
Degreasing Units EU#12	725	6.7	100%	MSDS	0%	0%	0	0	0	0	2.4	0

HAPs From Degreasing

	HAP Emission Factor (%)	Solvent Throughput (gal/yr)	Control Eff	Potential HAPs (tons/yr)
Tetrachloroethene	0.20	725	0.00%	0.005



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Daniel E Moore
Industrial Steel Construction, Inc.
86 N Bridge St
Gary, IN 46404

DATE: July 11, 2011

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

SUBJECT: Final Decision
Part 70
089-29933-00161

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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Toll Free (800) 451-6027
www.idem.IN.gov

July 11, 2011

TO: Gary Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Industrial Steel Construction, Inc.
Permit Number: 089-29933-00161

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07



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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: July 11, 2011

RE: Industrial Steel Construction, Inc. / 089-29933-00161

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

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	CDENNY 7/11/2011 Industrial Steel Construction, Inc. 089-29933-00161 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:	CERTIFICATE OF MAILING ONLY

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Daniel E Moore Industrial Steel Construction, Inc. 86 N Bridge St Gary IN 46404 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
5		Gary Public Library 220 W 5th Avenue Gary IN 46402 (Library)										
6		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
7		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
8		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
9		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
10		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
11		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
12		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
13		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
14		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
15		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										

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IDEM Staff	CDENNY 7/11/2011 Industrial Steel Construction, Inc. 089-29933-00161 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Barbara G. 506 Lilac Street East Chicago IN 46312 (Affected Party)										
2		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
3		Susan Grenzebach OCS Environmental 130 Lincoln St. Porter IN 46304 (Consultant)										
4		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
5		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)										
6		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
7		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
8		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
9		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
10		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
11		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
12												
13												
14												
15												

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