



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: December 15, 2011

RE: Steel Dynamics, Inc./019-30060-00089

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

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

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

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

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

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

Enclosures
FNPER.dot12/03/07



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Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Steel Dynamics, Inc.
5134 Loop Road
Jeffersonville, Indiana 47130

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

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

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

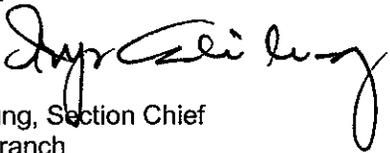
Operation Permit No.: M019-30060-00089	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 15, 2011 Expiration Date: December 15, 2021

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary steel coil coating facility.

Source Address:	5134 Loop Road, Jeffersonville, Indiana 47130
General Source Phone Number:	(812) 218-1490
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
County Location:	Loop
Source Location Status:	Nonattainment for PM _{2.5} standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) One (1) hot dip galvanizing line, constructed in 1998, with a nominal production capacity of 74 tons per hour, consisting of the following:
 - (1) One (1) alkaline cleaning process consisting of:
 - (i) one (1) hot soap dip tank equipped with one (1) natural gas-fired burner nominally rated at 5.3 MMBtu per hour,
 - (ii) one (1) hot water dip tank equipped with one (1) natural gas-fired burner nominally rated at 3.0 MMBtu per hour, and
 - (iii) one (1) exhaust blower equipped with a demister to remove particulate matter emissions in the air stream of the alkaline cleaning process, and exhausting to stack S2.
 - (2) One (1) four-section annealing furnace equipped with natural gas-fired low-NO_x burners, consisting of a preheat section nominally rated at 56.0 MMBtu per hour, exhausting to stack S1, and a radiant tube section nominally rated at 21.0 MMBtu per hour.
- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:
 - (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven. This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.

- (ii) one (1) curing oven for drying finish coat, identified as Finish Curing Oven.

These two ovens are heated by an integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour. The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

This unit is considered an affected source under 40 CFR Part 60, Subpart TT (Metal Coil Surface Coating).

- (c) Paved roads and parking lots with public access.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour that dries the steel strip as it exits the alkaline cleaning process.
 - (2) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour associated with the chemical treatment dip tank.
 - (3) One (1) quench tank hot air dryer, nominally rated at 2.0 MMBtu per hour.
- (e) Welding equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of one (1) lap seam welder that fuses coil ends together to allow continuous line operation.
- (f) Activities with emissions equal to or less than the following thresholds: 5 lb/hour or 25 lbs/day PM₁₀; 5 lbs/hour or 25 lbs/day SO₂; 5 lbs/hour or 25 lbs/day NO_x; 3 lbs/hour or 15 lbs/day VOC; 0.6 tons per year Pb; 5 lbs/day or 1.0 ton/year of a single HAP, and 12.5 lbs/day or 2.5 ton/year of any combination of HAPs, consisting of:
 - (1) One (1) electrically heated zinc pot.
 - (2) One (1) surface chemical treatment dip tank that applies a protective chromium coating to the surface of the steel, with no particulate formed in the process.

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, M019-30060-00089, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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

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

B.4 Enforceability

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

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

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

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. 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 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached or its equivalent no later than March 1 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
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.9 Preventive Maintenance Plan [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 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.
- (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.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M019-30060-00089 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.11 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.12 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require an affirmation that the statements in the application are true and complete, as known at the time of completion of the application, and shall subject the applicant to liability under state laws forbidding false or misleading statements, by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.13 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

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

B.16 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.17 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due no later than thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.18 Credible Evidence [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

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

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

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

The Permittee shall not operate an incinerator 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.6 Fugitive Dust Emissions [326 IAC 6-4]

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

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 60.120.

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

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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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 by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.

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

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

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

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the attached Malfunction Report Form (2 pages) or its equivalent. Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment subject to the requirements of 326 IAC 1-6 shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, 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.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

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

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

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) hot dip galvanizing line, constructed in 1998, with a nominal production capacity of 74 tons per hour, consisting of the following:
 - (1) One (1) alkaline cleaning process consisting of:
 - (i) one (1) hot soap dip tank equipped with one (1) natural gas-fired burner nominally rated at 5.3 MMBtu per hour,
 - (ii) one (1) hot water dip tank equipped with one (1) natural gas-fired burner nominally rated at 3.0 MMBtu per hour, and
 - (iii) one (1) exhaust blower equipped with a demister to remove particulate matter emissions in the air stream of the alkaline cleaning process, and exhausting to stack S2.
 - (2) One (1) four-section annealing furnace equipped with natural gas-fired low-NO_x burners, consisting of a preheat section nominally rated at 56.0 MMBtu per hour, exhausting to stack S1, and a radiant tube section nominally rated at 21.0 MMBtu per hour.

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

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

D.1.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

In order to render the requirements of 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) not applicable, the Permittee shall limit particulate matter emissions from the alkaline cleaning process to less than 2.01 pounds per hour.

Compliance with this limit, combined with the unlimited potential to emit PM from all other emission units at this source, shall limit the source-wide total actual PM emissions to less than 10 tons per 12 consecutive month period and shall render 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) not applicable.

D.1.2 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate from the alkaline cleaning process blower shall not exceed 48.3 pounds per hour when operating at a process rate of 74 tons (148,000 pounds) per hour.

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Nitrogen Oxide Emissions Limitations [326 IAC 10-1]

Pursuant to Permit # 019-9559-00089, issued on June 23, 1998 and 326 IAC 10-1(a)(3), the annealing furnace shall utilize low-NO_x burners.

Compliance Determination Requirements

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the demister for particulate control shall be in operation at all times the hot dip galvanizing line is in operation.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:
 - (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven. This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.
 - (ii) one (1) curing oven for drying finish coat, identified as Finish Curing Oven.

These two ovens are heated by a integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour. The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

This unit is considered an affected source under 40 CFR Part 60, Subpart TT.

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

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

D.2.1 Nitrogen Oxide Control Requirement (BACT) [326 IAC 10-1-1]

Pursuant to MSOP 019-22695-00089 on September 25, 2006 and 326 IAC 10-1-1(a)(3), for the primer curing oven and integral thermal oxidizer, the Permittee shall:

- (a) Utilize low-NO_x burners; and
- (b) Limit NO_x emissions to less than 3.51 pounds per hour.

D.2.2 Volatile Organic Compound (VOC) Content Limitations [326 IAC 8-2-4]

Pursuant to 326 IAC 8-2-4, no owner or operator may cause, allow or permit the discharge into the atmosphere of any VOC in excess of 2.6 pounds per gallon excluding water, delivered to the coating applicator for prime and topcoat or single coat operations.

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for this facility and its control device. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

D.2.4 PSD Minor Limit and MSOP Status [326 IAC 2-2] [326 IAC 2-6.1]

In order to maintain MSOP status, 326 IAC 2-6.1 and to render the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2, not applicable, the Permittee shall operate the thermal oxidizer at a minimum overall control efficiency of 97.8 % at all times that the coil coating line is in operation.

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC)

The compliance status with the VOC content limitation contained in Condition D.2.2 shall be achieved through one of the following:

- (a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) the source shall prepare or obtain 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.
- (b) Thermal Oxidizer
 - (i) Pursuant to 326 IAC 8-1-2(a)(2), the Permittee shall use a thermal oxidizer on the coil, and shall operate the thermal oxidizer within manufacturer's specifications.
 - (ii) 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 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 solids as applied; and
- 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 or equal to 53% at V = 8.64 lbs/gallon and E = 4.06 lbs/gallon.

D.2.6 Thermal Oxidizer

In order to comply with Condition D.2.4, the Permittee shall operate the thermal oxidizer at all times that the coil coating line is in operation.

D.2.7 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.2, D.2.4 and D.2.5, and as required under NSPS Subpart TT (Section E.1) and to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall perform VOC testing of the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent 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 2-5.1-3(a)(2)] [326 IAC 2-6.1-5(1)(2)]

D.2.8 Thermal Oxidation

- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the integral thermal oxidizer for measuring operating temperature. For the purpose of this condition, "continuous" means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour block average. From the date of issuance of this permit until the stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3-hour block average temperature of 1320°F.
- (b) The Permittee shall determine the 3-hour block average temperature from the most recent valid stack test that demonstrates compliance with the limit in Condition D.2.2.
- (c) On and after the date the stack test results are available, the Permittee shall operate the thermal oxidizers at or above the hourly average temperature as observed during the compliant stack test.
- (d) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.2.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be compared to the range as established in the most recent compliant stack test. A reading outside that range is not considered a deviation but Permittee shall take reasonable response steps in connection with the reading outside the range. Section C- Response to Excursions and Exceedances contains conditions regarding response steps.

Record Keeping Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.2.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain records of:
 - (1) The amount and VOC content of each coating material and solvent used less water on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The volume weighted VOC content of the coatings used for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.2.8, the Permittee shall maintain continuous temperature records for the thermal oxidizers and the 3-hour block average temperature used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.2.8, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers. The Permittee shall include in its daily record when a pressure or fan amperage reading is not taken and the reason for the lack of pressure or fan amperage reading (e.g., the process did not operate that day).

- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:
- (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven. This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.
 - (ii) one (1) curing oven for drying finish coat, identified as Finish Curing Oven.

These two ovens are heated by an integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour. The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

This unit is considered an affected source under 40 CFR Part 60, Subpart TT (Metal Coil Surface Coating).

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

New Source Performance Standards (NSPS Requirements [326 IAC 12-1])

E.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A-General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the coil coating line described in this section except when otherwise specified in 40 CFR Part 60, Subpart TT.

E.1.2 Standards of Performance for Metal Coil Surface Coating [40 CFR Part 60, Subpart TT]

Pursuant to 40 CFR Part 60, Subpart TT, the Permittee shall comply with the provisions of the New Source Performance Standards for Metal Coil Surface Coating, as specified in the following:

- (1) 40 CFR 60.460
- (2) 40 CFR 60.461
- (3) 40 CFR 60.462(a)(2)
- (4) 40 CFR 60.462(a)(3)
- (5) 40 CFR 60.463(a),(b)
- (6) 40 CFR 60.463(c)(2)
- (7) 40 CFR 60.464(a)
- (8) 40 CFR 60.464(c)
- (9) 40 CFR 60.465
- (10) 40 CFR 60.466

See Attachment A of this permit for the standards listed above.

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

Company Name:	Steel Dynamics, Inc
Address:	5134 Loop Road
City:	Jeffersonville, Indiana 47130
Phone #:	260-868-8191
MSOP #:	M019-30060-00089

I hereby certify that Steel Dynamics, Inc. is:

still in operation.

no longer in operation.

I hereby certify that Steel Dynamics, Inc. is:

in compliance with the requirements of MSOP M019-30060-00089.

not in compliance with the requirements of MSOP M019-30060-00089.

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

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

Noncompliance:

MALFUNCTION REPORT
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FAX NUMBER: (317) 233-6865

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

**Steel Dynamics, Inc.
5134 Loop Road
Jeffersonville, Indiana 47130**

Attachment A

New Source Performance Standards for Metal Coil Surface Coating

40 CFR 60, Subpart TT

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

[Browse Previous](#) | [Browse Next](#)

Subpart TT—Standards of Performance for Metal Coil Surface Coating

Source: 47 FR 49612, Nov. 1, 1982, unless otherwise noted.

§ 60.460 Applicability and designation of affected facility.

(a) The provisions of this subpart apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

(b) This subpart applies to any facility identified in paragraph (a) of this section that commences construction, modification, or reconstruction after January 5, 1981.

§ 60.461 Definitions.

(a) All terms used in this subpart not defined below are given the same meaning as in the Act or in subpart A of this part.

Coating means any organic material that is applied to the surface of metal coil.

Coating application station means that portion of the metal coil surface coating operation where the coating is applied to the surface of the metal coil. Included as part of the coating application station is the flashoff area between the coating application station and the curing oven.

Curing oven means the device that uses heat or radiation to dry or cure the coating applied to the metal coil.

Finish coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the final coating(s) on the surface of the metal coil. Where only a single coating is applied to the metal coil, that coating is considered a finish coat.

Metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

Prime coat operation means the coating application station, curing oven, and quench station used to apply and dry or cure the initial coating(s) on the surface of the metal coil.

Quench station means that portion of the metal coil surface coating operation where the coated metal coil is cooled, usually by a water spray, after baking or curing.

VOC content means the quantity, in kilograms per liter of coating solids, of volatile organic compounds (VOC's) in a coating.

(b) All symbols used in this subpart not defined below are given the same meaning as in the Act and in subpart A of this part.

C_a = the VOC concentration in each gas stream leaving the control device and entering the atmosphere (parts per million by volume, as carbon).

C_b = the VOC concentration in each gas stream entering the control device (parts per million by volume, as carbon).

C_f = the VOC concentration in each gas stream emitted directly to the atmosphere (parts per million by volume, as carbon).

D_c = density of each coating, as received (kilograms per liter).

D_d = density of each VOC-solvent added to coatings (kilograms per liter).

D_r = density of VOC-solvent recovered by an emission control device (kilograms per liter).

E = VOC destruction efficiency of the control device (fraction).

F = the proportion of total VOC's emitted by an affected facility that enters the control device (fraction).

G = volume-weighted average mass of VOC's in coatings consumed in a calendar month per unit volume of coating solids applied (kilograms per liter).

L_c = the volume of each coating consumed, as received (liters).

L_d = the volume of each VOC-solvent added to coatings (liters).

L_r = the volume of VOC-solvent recovered by an emission control device (liters).

L_s = the volume of coating solids consumed (liters).

M_d = the mass of VOC-solvent added to coatings (kilograms).

M_o = the mass of VOC's in coatings consumed, as received (kilograms).

M_r = the mass of VOC's recovered by an emission control device (kilograms).

N = the volume-weighted average mass of VOC emissions to the atmosphere per unit volume of coating solids applied (kilograms per liter).

Q_a = the volumetric flow rate of each gas stream leaving the control device and entering the atmosphere (dry standard cubic meters per hour).

Q_b = the volumetric flow rate of each gas stream entering the control device (dry standard cubic meters per hour).

Q_f = the volumetric flow rate of each gas stream emitted directly to the atmosphere (dry standard cubic meters per hour).

R = the overall VOC emission reduction achieved for an affected facility (fraction).

S = the calculated monthly allowable emission limit (kilograms of VOC per liter of coating solids applied).

V_s = the proportion of solids in each coating, as received (fraction by volume).

W_o = the proportion of VOC's in each coating, as received (fraction by weight).

§ 60.462 Standards for volatile organic compounds.

(a) On and after the date on which §60.8 requires a performance test to be completed, each owner or operator subject to this subpart shall not cause to be discharged into the atmosphere more than:

(1) 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s); or

(2) 0.14 kg VOC/ l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(3) 10 percent of the VOC's applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency; or

(4) A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/ l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency.

§ 60.463 Performance test and compliance provisions.

(a) Section 60.8(d) and (f) do not apply to the performance test.

(b) The owner or operator of an affected facility shall conduct an initial performance test as required under §60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in this section.

(c) The owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied.

(1) An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under §60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Administrator.

(i) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under paragraph (c)(1)(iv) of this section. The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

(A) Calculate the mass of VOC's used ($M_o + M_d$) during each calendar month for each affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{oi} D_{oi} W_{oi} + \sum_{j=1}^m L_{oj} D_{oj} \quad \text{Equation 1}$$

($\sum L_{oj} D_{oj}$ will be 0 if no VOC solvent is added to the coatings, as received)

where

n is the number of different coatings used during the calendar month, and

m is the number of different VOC solvents added to coatings used during the calendar month.

(B) Calculate the total volume of coating solids used (L_s) in each calendar month for each affected facility by the following equation:

$$L_s = \sum_{i=1}^n V_i L_{vi} \quad \text{Equation 2}$$

Where:

n is the number of different coatings used during the calendar month.

(C) Calculate the volume-weighted average mass of VOC's used per unit volume of coating solids applied (G) during the calendar month for each affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad \text{Equation 3}$$

(ii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during the calendar month for each affected facility by the following equation:

$$N = G \quad \text{Equation 4}$$

(iii) Where the volume-weighted average mass of VOC's discharged to the atmosphere per unit volume of coating solids applied (N) is equal to or less than 0.28 kg/l, the affected facility is in compliance.

(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

(2) An owner or operator shall use the following procedures for each affected facility that continuously uses a capture system and a control device that destroys VOC's (e.g., incinerator) to comply with the emission limit specified under §60.462(a) (2) or (3).

(i) Determine the overall reduction efficiency (R) for the capture system and control device.

For the initial performance test, the overall reduction efficiency (R) shall be determined as prescribed in paragraphs (c)(2)(i) (A), (B), and (C) of this section. In subsequent months, the owner or operator may use the most recently determined overall reduction efficiency (R) for the performance test, providing control device and capture system operating conditions have not changed. The procedure in paragraphs (c)(2)(i) (A), (B), and (C) of this section, shall be repeated when directed by the Administrator or when the owner or operator elects to operate the control device or capture system at conditions different from the initial performance test.

(A) Determine the fraction (F) of total VOC's emitted by an affected facility that enters the control device using the following equation:

$$F = \frac{\sum_{i=1}^l C_{in} Q_{in}}{\sum_{i=1}^l C_{in} Q_{in} + \sum_{j=1}^p C_{out} Q_{out}}$$

Equation 5

Where:

l is the number of gas streams entering the control device, and

p is the number of gas streams emitted directly to the atmosphere.

(B) Determine the destruction efficiency of the control device (E) using values of the volumetric flow rate of each of the gas streams and the VOC content (as carbon) of each of the gas streams in and out of the device by the following equation:

$$E = \frac{\sum_{i=1}^n Q_{in} C_{in} - \sum_{j=1}^m Q_{out} C_{out}}{\sum_{i=1}^n Q_{in} C_{in}}$$

Equation 6

Where:

n is the number of gas streams entering the control device, and

m is the number of gas streams leaving the control device and entering the atmosphere.

The owner or operator of the affected facility shall construct the VOC emission reduction system so that all volumetric flow rates and total VOC emissions can be accurately determined by the applicable test methods and procedures specified in §60.466. The owner or operator of the affected facility shall construct a temporary enclosure around the coating applicator and flashoff area during the performance test for the purpose of evaluating the capture efficiency of the system. The enclosure must be maintained at a negative pressure to ensure that all VOC emissions are measurable. If a permanent enclosure exists in the affected facility prior to the performance test and the Administrator is satisfied that the enclosure is adequately containing VOC emissions, no additional enclosure is required for the performance test.

(C) Determine overall reduction efficiency (R) using the following equation:

$$R = EF \quad \text{Equation 7}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) shall be computed as follows.

(ii) Calculate the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (A), (B), and (C) of this section.

(iii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month by the following equation:

$$N = G(1 - R) \quad \text{Equation 8}$$

(iv) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/ l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(3) An owner or operator shall use the following procedure for each affected facility that uses a control device that recovers the VOC's (e.g., carbon adsorber) to comply with the applicable emission limit specified under §60.462(a)(2) or (3).

(i) Calculate the total mass of VOC's consumed ($M_o + M_d$) during each calendar month for each affected facility using equation (1).

(ii) Calculate the total mass of VOC's recovered (M_r) during each calendar month using the following equation:

$$M_r = L_r D_r \quad \text{Equation 9}$$

(iii) Calculate the overall reduction efficiency of the control device (R) for each calendar month for each affected facility using the following equation:

$$R = \frac{M_r}{M_o + M_d} \quad \text{Equation 10}$$

If the overall reduction efficiency (R) is equal to or greater than 0.90, the affected facility is in compliance and no further computations are necessary. If the overall reduction efficiency (R) is less than 0.90, the average total VOC emissions to the atmosphere per unit volume of coating solids applied (N) must be computed as follows.

(iv) Calculate the total volume of coating solids consumed (L_s) and the volume-weighted average of the total mass of VOC's per unit volume of coating solids applied (G) during each calendar month for each affected facility using equations in paragraphs (c)(1)(i) (B) and (C) of this section.

(v) Calculate the volume-weighted average mass of VOC's emitted to the atmosphere (N) for each calendar month for each affected facility using equation (8).

(vi) If the weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to 0.14 kg/ l of coating solids applied, the affected facility is in compliance. Each monthly calculation is a performance test.

(4) An owner or operator shall use the following procedures for each affected facility that intermittently uses a capture system and a control device to comply with the emission limit specified in §60.462(a)(4).

(i) Calculate the total volume of coating solids applied without the control device in operation (L_{sn}) during each calendar month for each affected facility using the following equation:

$$L_{sn} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 11}$$

Where:

n is the number of coatings used during the calendar month without the control device in operation.

(ii) Calculate the total volume of coating solids applied with the control device in operation (L_{sc}) during each calendar month for each affected facility using the following equation:

$$L_{sc} = \sum_{i=1}^n V_{si} L_{ci} \quad \text{Equation 12}$$

Where:

n is the number of coatings used during the calendar month with the control device in operation.

(iii) Calculate the mass of VOC's used without the control device in operation ($M_{on} + M_{dn}$) during each calendar month for each affected facility using the following equation:

$$M_{on} + M_{dn} = \sum_{i=1}^n L_{ci} D_{ci} W_{ci} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 13}$$

Where:

n is the number of different coatings used without the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used without the control device in operation during the calendar month.

(iv) Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied without the control device in operation (G_n) during each calendar month for each affected facility using the following equation:

$$G_n = \frac{M_{on} + M_{dn}}{L_{sn}} \quad \text{Equation 14}$$

(v) Calculate the mass of VOC's used with the control device in operation ($M_{oc} + M_{dc}$) during each calendar month for each affected facility using the following equation:

$$M_{oc} + M_{dc} = \sum_{i=1}^n L_{ci} D_{ci} W_{ci} + \sum_{j=1}^m L_{dj} D_{dj} \quad \text{Equation 15}$$

Where:

n is the number of different coatings used with the control device in operation during the calendar month, and

m is the number of different VOC-solvents added to coatings used with the control device in operation during the calendar month.

(vi) Calculate the volume-weighted average of the total mass of VOC's used per unit volume of coating solids applied with the control device in operation (G_c) during each calendar month for each affected facility using the following equation:

(vii) Determine the overall reduction efficiency (R) for the capture system and control device using the procedures in paragraphs (c)(2)(i) (A), (B), and (C) or paragraphs (c)(3) (i), (ii), and (iii) of this section, whichever is applicable.

(viii) Calculate the volume-weighted average of VOC emissions to the atmosphere (N) during each calendar month for each affected facility using the following equation:

$$N = \frac{G_n L_{sn} + G_c L_{sc} (1 - R)}{L_{sn} + L_{sc}} \quad \text{Equation 17}$$

Equation 17

(ix) Calculate the emission limit(s) for each calendar month for each affected facility using the following equation:

$$S = \frac{0.28 L_{sn} + 0.1 G_c L_{sc}}{L_{sn} + L_{sc}}$$

or

$$\frac{0.28 L_{sn} + 0.14 L_{sc}}{L_{sn} + L_{sc}} \quad \text{Equation 18}$$

whichever is greater.

(x) If the volume-weighted average mass of VOC's emitted to the atmosphere for each calendar month (N) is less than or equal to the calculated emission limit (S) for the calendar month, the affected facility is in compliance. Each monthly calculation is a performance test.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.464 Monitoring of emissions and operations.

(a) Where compliance with the numerical limit specified in §60.462(a) (1) or (2) is achieved through the use of low VOC-content coatings without the use of emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, the owner or operator shall compute and record the average VOC content of coatings applied during each calendar month for each affected facility, according to the equations provided in §60.463.

(b) Where compliance with the limit specified in §60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in §60.463.

(c) If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with §60.462(a)(2), (3), or (4). This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration. If catalytic incineration is used, the owner or operator shall install, calibrate, operate, and maintain a device to monitor and record continuously the gas temperature both upstream and downstream of the incinerator catalyst bed. This device shall have an accuracy of ± 2.5 °C. or ± 0.75 percent of the temperature being measured expressed in degrees Celsius, whichever is greater. During coating operations, the owner or operator shall record all periods in excess of 3 hours where the average difference between the temperature upstream and downstream of the incinerator catalyst bed remains below 80 percent of the temperature difference at which compliance was demonstrated during the most recent measurement of incinerator efficiency or when the inlet

temperature falls more than 28 °C (50 °F) below the temperature at which compliance with §60.462(a)(2), (3), or (4) was demonstrated during the most recent measurement of incinerator efficiency required by §60.8. The records required by §60.7 shall identify each such occurrence and its duration.

[47 FR 49612, Nov. 1, 1982; 48 FR 1056, Jan. 10, 1983, as amended at 65 FR 61761, Oct. 17, 2000]

§ 60.465 Reporting and recordkeeping requirements.

(a) Where compliance with the numerical limit specified in §60.462(a) (1), (2), or (4) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by §60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with §60.462(a)(4) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation.

(b) Where compliance with §60.462(a)(2), (3), or (4) is achieved through the use of an emission control device that destroys VOC's, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by §60.8:

(1) The overall VOC destruction rate used to attain compliance with §60.462(a)(2), (3), or (4) and the calculated emission limit used to attain compliance with §60.462(a)(4); and

(2) The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with §60.462(a)(2), (3), or (4).

(c) Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Administrator every calendar quarter of each instance in which the volume-weighted average of the local mass of VOC's emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under §60.462. If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Administrator semiannually.

(d) The owner or operator of each affected facility shall also submit reports at the frequency specified in §60.7(c) when the incinerator temperature drops as defined under §60.464(c). If no such periods occur, the owner or operator shall state this in the report.

(e) Each owner or operator subject to the provisions of this subpart shall maintain at the source, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

[47 FR 49612, Nov. 1, 1982, as amended at 55 FR 51383, Dec. 13, 1990; 56 FR 20497, May 3, 1991; 65 FR 61761, Oct. 17, 2000]

§ 60.466 Test methods and procedures.

(a) The reference methods in appendix A to this part, except as provided under §60.8(b), shall be used to determine compliance with §60.462 as follows:

(1) Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

(2) Method 25, both for measuring the VOC concentration in each gas stream entering and leaving the control device on each stack equipped with an emission control device and for measuring the VOC concentration in each gas stream emitted directly to the atmosphere;

(3) Method 1 for sample and velocity traverses;

(4) Method 2 for velocity and volumetric flow rate;

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

(b) For Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

(c) For Method 25, the sampling time for each of three runs is to be at least 60 minutes, and the minimum sampling volume is to be at least 0.003 dscm (0.11 dscf); however, shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator.

(d) The Administrator will approve testing of representative stacks on a case-by-case basis if the owner or operator can demonstrate to the satisfaction of the Administrator that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks.

[47 FR 49612, Nov. 1, 1982, as amended at 51 FR 22938, June 24, 1986; 65 FR 61761, Oct. 17, 2000]

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

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

Source Background and Description
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Source Name:	Steel Dynamics, Inc.
Source Location:	5134 Loop Road, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3479 (Coating, Engraving and Allied Services, Not Elsewhere Classified)
Operation Permit No.:	M019-30060-00089
Permit Reviewer:	Deborah Cole

On August 11, 2011, the Office of Air Quality (OAQ) had a notice published in The Evening News, Jeffersonville, Indiana, stating that Steel Dynamics, Inc. had applied for a Minor Source Operating Permit Renewal. The notice also stated that the OAQ proposed to issue a Minor Source Operating Permit Renewal 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.

Comments and Responses

On September 9, 2011, Steel Dynamics, Inc. submitted comments to IDEM, OAQ on the draft Minor Source Operating Permit Renewal M019-30060-00089.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

Comment 1:

SDI believes that Condition B.16 (b) should be modified such that if a change in ownership occurs, it is the new owner who is required to submit a permit application and not the current Permittee.

Response to Comment 1:

IDEM is not modifying the condition because the "Permittee" can be defined as the current Permittee or the new Permittee. In some cases, it can be required that the current authorized individual to confirm the request if the application was submitted by the new owner.

There is no change to the permit due to this comment.

Comment 2:

SDI respectfully requests that Condition D.1.1 be removed as the cited rule (326 IAC 6.5 (Particulate Matter Emission Limitations Except Lake County) only applies to specifically-named sources, which does not include SDI, and to certain types of sources with particulate potential to emit values set at more than 100 tons per year or actual emissions of more than 10 tons per year. The industries named in this second category (steam generators, asphalt/concrete plants, grain elevators, gray iron foundries and mineral aggregate operations do not include SID's coil coating operation. Moreover 326 IAC 6.5-1-1(b) states that natural gas-fired units are not subject to these limits, thus the cited rule is inapplicable.

Response to Comment 2:

The applicability of 326 IAC 6.5-1-1 (shown in *italics*) is as follows, with the corresponding evaluation for SDI (shown in normal font):

(a) *Except as provided in subsections (b) and (c), sources or facilities located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne shall comply with the limitations in:*

(1) *326 IAC 6.5-2 through 326 IAC 6.5-10, if the source or facility is specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10;*

SDI is located in Clark County, which is one of the counties specified in this rule. However, SDI is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore 326 IAC 326 IAC 6.5-1-1(a)(1) does not apply.

Or

(2) *Section 2 of this rule, if the source or facility is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, but has:*

(A) *the potential to emit one hundred (100) tons or more;*

or

(B) *actual emissions of ten (10) tons or more; of particulate matter per year.*

Since SDI is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, then it has to be evaluated if SDI has a PM potential to emit (PTE) of 100 tons/year or more or actual emissions of PM of 10 tons/year or more. If one of the above is satisfied, then SDI has to comply with 326 IAC 6.5-1-2.

SDI does not have a PM PTE of 100 tons/year or more. However, it has the capability to actually emit 10 tons per year of PM. To assure that the actual emissions are less than 10 tons/year of PM, an enforceable condition has been specified in the permit to render 326 IAC 6.5-1-2.

SDI's interpretation that 326 IAC 6.5-1-2 only applies to the following specific operations is incorrect: fuel combustion steam generators, asphalt concrete plants, grain elevators, grain iron foundries, glass manufacturing and mineral aggregates; because pursuant to 326 IAC 6.5-1-2(a), PM emissions for specific operations not mentioned above shall not exceed 0.03 grain per dry standard cubic foot. Since SDI's operation is not one of the above mentioned operations, SDI is subject to this grain loading limitation. However, as stated above, an enforceable condition has been specified to render this grain loading limitation not applicable.

(b) *Particulate limitations shall not be established for combustion units that burn only natural gas at sources or facilities identified in 326 IAC 6.5-2 through 326 IAC 6.5-10, as long as the units continue to burn only natural gas.*

SDI is not one of the sources listed in 326 IAC 6.5-2 through 326 IAC 6.5-10. Therefore, the permit did not specify PM limits for units that burn natural gas.

(c) *If the limitations in 326 IAC 6.5-2 through 326 IAC 6.5-10 and section 2 of this rule conflict with or are inconsistent with limitations established in 326 IAC 12, then the more stringent limitation shall apply.*

SDI is not subject to any limitations established in 326 IAC 12. Therefore, this does not apply.

Based on the above analysis, there is no change to the permit due to this comment.

Comment 3:

SDI requests that Condition D.1.3 be modified to delete the words "BACT and". Though this wording did appear in a prior permit it is not clear that the BACT reference is correct.

Response to Comment 3:

IDEM agrees with the recommended changes and the permit has been revised as follows:

D.1.3 Nitrogen Oxide Emissions Limitations [326 IAC 10-1]

Pursuant to Permit # 019-9559-00089, issued on June 23, 1998 and 326 IAC 10-1(a)(3), the annealing furnace shall utilize low-NOx burners to satisfy the requirements of BACT and 326 IAC 10-1-1(a)(3).

Comment 4:

SDI respectfully requests that the following language be added to Condition D.2.2:
"Compliance with this limit is achieved through the use of a thermal oxidizer."

Response to Comment 4:

IDEM does not agree with the recommended change because subsequent conditions specify how to comply with the limit specified in Condition D.2.2.

There is no change to the permit due to this comment.

Comment 5:

SDI respectfully requests that Condition D.2.4 be removed as, ultimately, compliance with applicable limits is met through the use of a thermal oxidizer. As allowed by rule SDI utilizes a thermal oxidizer to maintain compliance with the VOC limit contained within the permit. According to 326 IAC 8-1-1, the general provisions of 326 IAC 8-1 apply to all other parts of 326 IAC 8, including 326 IAC 8-2-4 "Surface Coating Emission Limitations". 326 IAC 8-1-2 provides that "limitations specified in this article shall be achieved through one or any combination of the following: (2) Thermal or catalytic incineration", thus allowing a thermal oxidizer to be the sole means of compliance with the permit and proposed condition D.2.2 (see above). 326 IAC 8-1-4(a)(3) and Condition D.2.5 further ensure that compliance is being met by specifically defining the means for determining the oxidizer's efficiency and that testing frequency/methodology to be used. Finally, from a practical perspective, as SDI's thermal oxidizer is integral to the process and is designed to use the coatings' VOCs as a primary fuel there is no coating with a VOC content high enough to exceed the limit in proposed Condition 2.2 after control. In light of the justification above, the language contained in 326 IAC 8, and given all the requirements already placed on the thermal oxidizer, SDI respectfully requests that this condition be removed.

Response to Comment 5:

Note: Condition D.2.4 is now condition D.2.5 in the draft permit.

There are several options that the source can use to comply with 326 IAC 8-2-4. As SDI confirms, they are going to comply by the use of a thermal oxidizer. Therefore, the permit has to specify the efficiency of the thermal oxidizer in accordance with 326 IAC 8-1-2(a)(3).

To clarify this condition, the following changes were made to D.2.4 (now D.2.5) including renumbering because of an additional requirement that was added.

D.2.45 Volatile Organic Compounds (VOC)

~~(b)~~ The compliance status with the VOC content limitation contained in Condition D.2.2 shall be achieved through **one of** the following:

(a) ~~Compliance with the VOC content limitations contained in Condition D.2.2 shall be determined~~ Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a), **the source shall 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.

~~(b)~~ ~~The compliance status with the VOC content limitation contained in Condition D.2.2 shall be achieved through the following:~~

(b) ~~(1)~~ Thermal Oxidizer

(i) Pursuant to 326 IAC 8-1-2(a)(2), the Permittee shall use a thermal oxidizer on the coil coating line, and shall operate the thermal oxidizer within manufacturer's specifications.

(ii) 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 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 solids as applied; and

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 or equal to 53% at V = 8.64 lbs/gallon and E = 4.06 lbs/gallon.

~~Compliance with this requirement, combined with the unlimited potential to emit VOC from all other emission units at this source, shall limit the source-wide total VOC emissions to less than 250 tons per 12 consecutive month period and shall render 326 IAC 2-2 (PSD) not applicable.~~

(Note: the above statement has been deleted because this condition is solely for the compliance with 326 IAC 8-2-4. It is independent and separate in determining PSD minor status of the source.

Comment 6:

In operation, the VOCs present in the various coatings act as the primary fuel for the thermal oxidizer and being integral to the process their combustion provides heat for the curing ovens. Destruction of the VOCs to the satisfaction of the permit limit is known to occur at or above a temperature of 1,275°F. As in large part it is the presence of the VOCs that determines the operating temperature, requiring SDI to maintain a higher set temperature (whether derived from a stack test or not) provides no environmental benefit as reaching this temperature would require the addition of excess combustion fuel (natural gas). The addition of extra fuel leads to the generation of more NOx emissions. For these reasons, SDI respectfully requests that Condition D.2.6(a) be amended to read as found below and that Conditions 2.6(b) and (c) be removed (now D.2.8).

"A continuous monitoring system shall be calibrated, maintained, and operated on the integral thermal oxidizer for measuring operating temperature. For the purpose of this condition, "continuous" means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour block average. ~~From the date of issuance of this permit until the stack test results are available,~~ The Permittee shall operate the thermal oxidizers at or above the 3-hour block average temperature of 1,275°F.

Response to Comment 6:

Note: Condition D.2.6 is now D.2.8.

IDEM has reviewed SDI's most recent stack test, performed on July 31, 2008, which indicates that the operating temperature of the thermal oxidizer during the test was 1320°F, not 1275°F. This stack test was performed after the issuance of the MSOP 019-22695-00089. Therefore, this is the most recent stack test and the operating temperature for the thermal oxidizer will be revised from 1275°F to 1320°F.

Further, the language which states: "from the date of issuance of this permit until stack test results are available" will not be removed from Condition D.2.6 (now D.2.8).

IDEM will include the word "block" in the condition.

D.2.68 Thermal Oxidation

-
- (a) A continuous monitoring system shall be calibrated, maintained, and operated on the integral thermal oxidizer for measuring operating temperature. For the purpose of this condition, "continuous" means no less than once per fifteen (15) minutes. The output of this system shall be recorded as a 3-hour **block** average. From the date of issuance of this permit until the stack test results are available, the Permittee shall operate the thermal oxidizers at or above the 3-hour **block** average temperature of ~~1,275°F~~ **1,320°F**.

Comment 7:

SDI respectfully requests that Condition D.2.6 (d) and (e) (now D.2.8 (d) and (e)) be removed as they were not present in prior permits and do not provide any useful information for compliance. It is the temperature in the oxidizer that destroys the VOCs, thus temperature is the critical variable to monitor to ensure compliance. Continuous compliance is already ensured via periodic stack tests coupled with the continuous monitoring of the oxidizer temperature. As the design of the oxidizer does not change, these two items verify that complete VOC destruction is occurring. Even though SDI believes that monitoring of fan amps and duct pressure provide no useful compliance related information, if IDEM wishes to add these parameters to the permit SID proposes the following compromise. Condition D.2.6(e) (now D.2.8 (e)) would be amended as follows:

D.2.6 Thermal Oxidation

...

- (d) The Permittee shall determine the appropriate duct pressure or fan amperage from the most recent valid stack test that demonstrates compliance with limits in Conditions D.2.2.
- (e) The duct pressure or fan amperage shall be observed at least once per day when the thermal oxidizer is in operation. On and after the date the stack test results are available, the duct pressure or fan amperage shall be ~~maintained within the normal~~ compared to **the range** as established in the most recent compliant stack test. **A reading outside that range is not considered a deviation but Permittee shall take reasonable response steps in connection with the reading outside the range. Section C - Response to Excursions and Exceedances contains conditions regarding response steps.**

Response to Comment 7:

IDEM will accept the proposed language. Condition D.2.6 is now Condition D.2.8.

Comment 8:

If IDEM agrees to the changes proposed for that Condition D.2.2 (see above), then SDI requests that this condition be amended to be consistent with those changes.

Response to Comment 7:

IDEM did not make the requested modification to Condition D.2.2 so Condition D.2.8 (now D.2.9) will not be amended.

Additional Changes

IDEM, OAQ has decided to make additional revisions to the permit as described below, with deleted language as ~~strikeouts~~ and new language **bolded**.

Change 1

IDEM has removed the following language from Condition D.2.1 referring to the requirements of the BACT because the language referring to the BACT included in D.1.3 has been removed.

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

D.2.1 Nitrogen Oxide Control Requirement (BACT) [326 IAC 10-1-1]

Pursuant to MSOP 019-22695-00089 on September 25, 2006 and 326 IAC 10-1-1(a)(3), for the primer curing oven and integral thermal oxidizer, the Permittee shall:

- (a) Utilize low-NOx burners ~~to satisfy the requirements of BACT~~; and
- (b) Limit NOx emissions to less than 3.51 pounds per hour.

Change 2

In determining the applicability of 326 IAC 2-2 (PSD), the integral determination for the thermal oxidizer is not taken into consideration. Since the VOC PTE before control is greater than 250 tons/year (See Appendix A), the following condition has been added to the permit in order to render 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable:

D.2.4 PSD Minor Limit and MSOP status [326 IAC 2-2] [326 2-6.1]

In order to maintain MSOP status [326 IAC 2-6.1] and to render the requirements of Prevention of Significant Deterioration (PSD) [326 IAC 2-2] not applicable, the Permittee shall operate the thermal oxidizer at a minimum overall efficiency of 97.8% at all times that the coil coating line is in operation.

The overall control efficiency of the thermal oxidizer was determined as follows:

VOC PTE of the coating line before control = 4,360 tons per year (see Appendix A, Page 2)
VOC PTE of the coating line after control = 95.2 tons per year
(such that the source maintain its MSOP status)

VOC PTE after control = (VOC PTE before control)*(1-control efficiency)
(95.2 tons/yr) = (4,360 tons/yr)*(1-control efficiency)
Control efficiency = 97.8%

Due to the addition of a new condition (D.2.4), the draft permit M019-30060-00089 will be placed on Public Notice a second time.

Change 3

A Compliance Determination Requirement was added as Condition D.2.5 which requires the thermal oxidizer to operate at all times the coil coating line is in operation. This condition was inadvertently left out of the original permit and has now been added.

D.2.6 Volatile Organic Compounds (VOC)

In order to comply with Condition D.2.4, the Permittee shall operate the thermal oxidizer at all times that the coil coating line is in operation.

Change 4

The remaining conditions in Section D.2 have been renumbered accordingly.

IDEM Contact

- (a) Questions regarding this proposed Minor Source Operating Permit Renewal can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the permit 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

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Steel Dynamics, Inc.
Source Location:	5134 Loop Road, Jeffersonville, IN 47130
County:	Clark
SIC Code:	3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
Permit Renewal No.:	M019-30060-00089
Permit Reviewer:	Deborah Cole

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Steel Dynamics, Inc. relating to the operation of a stationary steel coil coating operation. On December 28, 2010, Steel Dynamics, Inc. submitted an application to the OAQ requesting to renew its operating permit. Steel Dynamics, Inc. was issued a New Construction MSOP (M019-22695-00089) on September 25, 2006.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) hot dip galvanizing line, constructed in 1998, with a nominal production capacity of 74 tons per hour, consisting of the following:
 - (1) One (1) alkaline cleaning process consisting of
 - (i) one (1) hot soap dip tank equipped with one (1) natural gas-fired burner nominally rated at 5.3 MMBtu per hour,
 - (ii) one (1) hot water dip tank equipped with one (1) natural gas-fired burner nominally rated at 3.0 MMBtu per hour, and
 - (iii) one (1) exhaust blower equipped with a demister to remove particulate matter emissions in the air stream of the alkaline cleaning process, and exhausting to stack S2.
 - (2) One (1) four-section annealing furnace equipped with natural gas-fired low-NO_x burners, consisting of a preheat section nominally rated at 56.0 MMBtu per hour, exhausting to stack S1, and a radiant tube section nominally rated at 21.0 MMBtu per hour.
- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:
 - (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven. This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.

- (ii) one (1) curing oven for drying finish coat, identified as Finish Curing Oven.

These two ovens are heated by an integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour. The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

This unit is considered an affected source under 40 CFR Part 60, Subpart TT.

- (c) Paved roads and parking lots with public access.
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) One (1) natural gas-fired hot air dryer rated at 2.0 MMBtu per hour that dries the steel strip as it exits the alkaline cleaning process.
 - (2) One (1) natural gas-fired hot air dryer rated at 2.0 MMBtu per hour associated with the chemical treatment dip tank.
 - (3) One (1) quench tank hot air dryer, rated at 2.0 MMBtu per hour.
- (e) Welding equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of one (1) lap seam welder that fuses coil ends together to allow continuous line operation.
- (f) Activities with emissions equal to or less than the following thresholds: 5 lb/hour or 25 lbs/day PM₁₀; 5 lbs/hour or 25 lbs/day SO₂; 5 lbs/hour or 25 lbs/day NO_x; 3 lbs/hour or 15 lbs/day VOC; 0.6 tons per year Pb; 5 lbs/day or 1.0 ton/year of a single HAP, and 12.5 lbs/day or 2.5 ton/year of any combination of HAPs, consisting of:
 - (1) One (1) electrically heated zinc pot.
 - (2) One (1) surface chemical treatment dip tank that applies a protective chromium coating to the surface of the steel, with no particulate formed in the process and the solution does not contain any VOC.

Existing Approvals

Since the issuance of the MSOP (019-22695-00089) on September 25, 2006, the source has constructed or has been operating under the following additional approvals:

There have been no additional approvals for this source since the issuance of the MSOP (019-22695-00089) on September 25, 2006

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.

Air Pollution Control Justification as an Integral Part of the Process

As part of the source's initial permit application, the company submitted information regarding the thermal oxidizer as integral to the coil coating line. IDEM, OAQ evaluated the justifications and

agreed in M019-22695-00089, issued on September 25, 2006 that the thermal oxidizer will be considered as an integral part of the coil coating line.

The company submitted the following justification to support that the thermal oxidizer is an integral part of the coil coating line:

The coil coating line at the Jeffersonville plant consists of four operations:

- (1) surface coating, which applies primer coat in one pass;
- (2) a four-zone Primer Curing Oven, which flash dries the primer coat;
- (3) surface coating, which applies finish coat in one pass, and
- (4) a four-zone Finish Curing Oven, which flash dries the top coat.

The coating line includes a thermal oxidizer which provides the high temperature heat needed to cure the coatings.

The four zones of the Primer Curing Oven are each preheated prior to operation with a 2.9 MMBtu per hour natural gas-fired burner. The Thermal Oxidizer has a 60 MMBtu per hour natural gas-fired burner which supplies heat during startup and supplemental heat during normal operations. Exhaust air containing volatile organic compounds (VOC) from the surface coating rooms and zones one and two of the curing ovens is mixed with fresh air, preheated indirectly (via a heat exchanger) with the exhaust gases from the thermal oxidizer, and routed to the Primer Curing Oven. Gases exiting the Primer Curing Oven go through the thermal oxidizer, incinerating VOCs, and then pass through the heat exchanger (mentioned above) to indirectly heat the air that is circulated in the Primer Curing Oven and Finish Curing Oven (also mentioned above). The heat exchanger, via the thermal oxidizer, is the only heat source that can generate the temperatures necessary for curing the paint and producing a marketable product.

During normal operations, the primary fuel for the thermal oxidizer is the VOC emissions from the surface coating operation. Supplemental fuel is provided by natural gas. The thermal oxidizer is able to operate on natural gas for startup and if needed during production interruptions. The Primer Curing Oven uses natural gas fired burners to preheat the oven, but these burners do not supply any process heat after startup, as combustion emissions would contaminate the surface coating. The thermal oxidizer is the sole source of the process heat necessary for this production operation. The operating temperatures required for a properly cured product (1500°F) require the operation of the integral thermal oxidizer at a minimum temperature significantly higher than that required for adequate destruction of VOCs. As the primary heat source, the thermal oxidizer must be operated at or above the highest minimum temperature required by any part of the system. The Primer Curing Oven and the Finish Curing Oven cannot operate without operation of the thermal oxidizer, and the coil coating line cannot produce an acceptable finished product without the ovens. For these reasons, the thermal oxidizer is integral to the process.

SUMMARY: The coatings require clean, high temperature air for fast, uncontaminated curing at economical line speed. The thermal oxidizer is the only heat source for the coil coating line during production. The VOC emissions from the coil coating line provide the primary fuel for the thermal oxidizer, with natural gas supplementing the VOC emissions to maintain adequate heat. Natural gas is used during startup and process interruptions. Exhaust gases from the thermal oxidizer are passed through a heat exchanger, and the indirectly heated air is vented to the Primer Curing Oven and Finish Curing Oven. The primary purpose of the thermal oxidizer is to provide heat to cure the coatings. The coil coating line cannot operate without the thermal oxidizer, and would be necessary even if there were no air quality regulations. The thermal oxidizer design utilizes VOC from the coatings to provide the primary source of fuel for heating and curing the paint during the production process.

Note: The source has measured a 99.3 % VOC destruction efficiency in a stack test done on the coil coating line at the Jeffersonville site on July 31, 2008.

IDEM, OAQ evaluated the justification and agreed that the thermal oxidizer should be considered as an integral part of the coil coating line. Therefore, the permitting level will be determined using

the potential to emit after the thermal oxidizer. Operating conditions in the proposed permit will specify that this thermal oxidizer shall operate at all times when the coil coating line is in operation.

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 Clark County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective July 19, 2007, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.

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. Clark 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}

Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943, dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. 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

Clark County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. 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.

Pollutant	Potential To Emit (tons/year)
PM	14.83
PM10 ⁽¹⁾	18.77
PM2.5	17.45
SO ₂	0.41
NO _x	37.19
CO	58.04
VOC	47.35
GHGs as CO ₂ e	82,944

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all regulated pollutants is less than 100 tons per year. However, the potential to emit VOC, CO and NO_x is equal to or greater than twenty-five (25) tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source will be issued an MSOP Renewal.
- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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	PM10*	PM2.5	SO ₂	NO _x	CO	VOC	GHGs as CO ₂ e****	Total HAPs	Worst Single HAP
Alkaline Cleaning Process	13.40	13.40	13.40	-	-	-	-	-	-	-
Surface Coating***	-	-	-	-	-	-	43.55	-	9.57	4.56 1-2-4 Trimethyl -benzene
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.2	58.04	3.80	82,944	1.30	-
Welding	0.11	0.11	0.11	-	-	-	-	-	0.01	-
Surface Chemical Treatment Dip Tank**	-	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	14.83	18.77	17.45	0.41	37.19	58.04	47.35	82,944	10.88	
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

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 (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

** No particulate is formed in this process and the solution does not contain VOC.

*** PTE after the integral thermal oxidizer.

****The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

- (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 not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutant, PM_{2.5}, is less than one hundred (<100) tons per year.

Federal Rule Applicability

New Source Performance Standards (NSPS)

- (a) The source is not subject to the requirements of the New Source Performance Standards for Surface Coating of Metal Furniture (40 CFR 60, Subpart EE, 326 IAC 12) because this source does not apply organic surface coatings to metal furniture.
- (b) The source is not subject to the requirements of the New Source Performance Standards for Automobile and Light Duty Truck Surface Coating Operations (40 CFR 60, Subpart MM, 326 IAC 12) because this source does not apply surface coatings to automobiles or light duty trucks.
- (c) The source is still subject to the requirements of the New Source Performance Standards for Metal Coil Surface Coating (40 CFR 60, Subpart TT, 326 IAC 12) because the the coil coating line applies prime coats and finish coats to metal coil and this coating line commenced construction after January 5, 1981.

The coil coating line is subject to the following portions of Subpart TT.

- (1) 40 CFR 60.460
- (2) 40 CFR 60.461
- (3) 40 CFR 60.462(a)(2)
- (4) 40 CFR 60.462(a)(3)
- (5) 40 CFR 60.463(a),(b)
- (6) 40 CFR 60.463(c)(2)
- (7) 40 CFR 60.464(a)
- (8) 40 CFR 60.464(c)
- (9) 40 CFR 60.465
- (10) 40 CFR 60.466

The provisions of 40 CFR 60 Subpart A – General Provisions, which are incorporated as 326 IAC 12-1-1, apply to the coil coating line except when otherwise specified in 40 CFR 60 Subpart TT.

- (d) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (e) The requirements of the National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (40 CFR 63, Subpart T) are not included in this permit for the alkaline cleaning process on the hot dip galvanizing line because the source uses a hot soap dip tank and a hot water dip tank for cleaning purposes and does not use individual batch vapor, in-line vapor, in-line cold and batch cold solvent cleaning machines that use any halogenated HAP pollutants.
- (f) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Metal Coil (40 CFR 63, Subpart SSSS) are not included in this permit for the coil coating line because it is not a major source of HAP. The potential to emit of any single HAP at this source is less than ten (10) tons per year, and any combination of HAPs is less than twenty-five (25) tons per year.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing (40 CFR 63.5080, Subpart HHHHH) are not included in this permit for the coil coating line because the source does not manufacture coatings and is not a major source of HAP. The potential to emit of any single HAP at

this source is less than ten (10) tons per year, and any combination of HAPs is less than twenty-five (25) tons per year.

- (h) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

CAM Applicability

Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit pursuant to 326 IAC 2-7 (Part 70); it is not located in Lake, Porter, or LaPorte County, and its potential to emit lead is less than 5 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

This source is located in Clark County, Jeffersonville Township. Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The source maintains paved roads and parking lots with public access. Pursuant to 326 IAC 6-4, the Permittee shall not generate fugitive dust to the extent that some portion of the material escapes 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.

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

The source is located in Clark County, was constructed after December 13, 1985 and does not have the potential to emit equal to or greater than 25 tons per year of fugitive particulate emissions. Therefore, the source is not subject to the requirements of 326 IAC 6-5.

326 IAC 6.5 (Particulate Emission Limitations: Clark County)

This source is located in Clark County and the source is not specifically listed in 326 IAC 6.5-2 and the source-wide potential to emit of particulate is less than 100 tons per year. However, the actual emissions could be greater than 10 tons per year. The source is limiting particulate emissions from the alkaline cleaning process to less than 2.01 pounds per hour which combined with the unlimited potential to emit PM from all other emissions units will limit particulate to less than ten (10) tons per year and shall render the requirements of 326 IAC 6.5 not applicable. This is a new requirement added to the permit.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) because it was constructed after January 1, 1980, and the source has accepted federally enforceable limits on emissions of VOC such that the potential to emit of VOC is less than 100 tons per year.

Hot Dip Galvanizing Line - Alkaline Cleaning Process

(a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Since the source is not subject to 326 IAC 6.5 (by taking limit to make actual emissions to less than 10 tons per year), 326 IAC 6-3 will be applicable.

Pursuant to 326 IAC 6-3-2, the particulate from the alkaline cleaning process blower shall not exceed 48.3 pounds at a process weight rate of 74 tons (148,000 pounds) per hour.

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The demister shall be in operation at all times the alkaline cleaning process is in operation in order to comply with this limit.

Based on the results of a stack test conducted on particulate emissions from the alkaline cleaning process blower on November 16, 2000, the emissions from the alkaline cleaning process were in compliance with this limit.

(b) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The natural gas fired combustion units (hot air dryers) are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they each have the potential to emit less than 25 tons per year of SO₂.

(c) 326 IAC 10 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is located in Clark County. The requirements of 326 IAC 10 apply to individual facilities.

The two (2) MMBtu/hr hot air dryers associated with the alkaline cleaning process are a source of nitrogen oxide emissions, were constructed after July 12, 1996, and are not a facility to which an NSPS applies. However, these hot air dryers would not be required to be permitted if they were the only equipment at the source and they do not require a permit under 326 IAC 2; therefore, the requirements of 326 IAC 10 do not apply to these dryers. This applicability determination is in accordance with 326 IAC 10-1-1(a)(3).

(d) A Preventive Maintenance Plan (PMP) will not be required for the hot dip galvanizing line because the process uses a demister which relies on passive screens which do not require any particular maintenance.

Hot Dip Galvanizing Line - Annealing Furnaces and other combustion units

(a) 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The two-section annealing furnace, cleaner heater, rinse water heater, cleaner dryer heater, and chem treat dryer are not subject to this rule because they are not considered sources of indirect heating.

- (b) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The two-section annealing furnace, cleaner heater, rinse water heater, cleaner dryer heater, and chem treat dryer are not subject to this rule because there are no process emissions.
- (c) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The natural gas fired combustion units (annealing furnace: preheat section and radiant tube section; cleaner heater, rinse water heater, cleaner dryer heater, and chem treat dryer) are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they each have the potential to emit less than 25 tons per year of SO₂.
- (d) 326 IAC 10 (Nitrogen Oxides Control in Clark and Floyd Counties)
The annealing furnace has been subject to 326 IAC 10 since it was initially permitted under CP 019-9559-00089, issued on June 23, 1998 because this source is located in Clark County, and the annealing furnaces are a source of nitrogen oxide emissions, require a permit under 326 IAC 2, were constructed after July 12, 1996, and are not a facility to which an NSPS applies. This applicability determination is in accordance with 326 IAC 10-1-1(a)(3).

Pursuant to Permit # 019-9559-00089, issued on June 23, 1998, and 326 IAC 10-1, the annealing furnace shall utilize low-NOx burners to satisfy the requirements of BACT and 326 IAC 10-1-1(a)(3). This is an existing requirement and is not revised by this renewal.

The source conducted stack tests on November 16, 2000 on NOx emissions from the annealing furnace burners. The stack test results showed that the burners demonstrated compliance with the limit.

- (e) A Preventive Maintenance Plan (PMP) will not be required for the annealing furnace and other combustion units because the units are not large emitters and use integral low NOx burners. The low NOx burners rely upon their design to control NOx and do not depend upon any particular maintenance or operational technique.

Coil Coating Line

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3-2 are not applicable to the coil coating line because the coatings applied to the steel coil are applied using a roll coating method (100% transfer efficiency).
- (b) 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)
The natural gas fired combustion units (thermal oxidizer, Primer Curing Oven, and Finish Curing Oven) are not subject to the requirements of 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) because they each have the potential to emit less than 25 tons per year of SO₂.
- (c) 326 IAC 8-1-6 (Best Available Control Technology (BACT))
The coil coating line was constructed after January 1, 1980 and has a potential to emit VOC before controls greater than twenty-five (25) tons per year. However, the requirements of 326 IAC 8-1-6 do not apply because this facility is regulated by another Article 8 rule.
- (d) 326 IAC 8-2-4 (Coil Coating Operations)
The coil coating line applies coatings to metal coil and was constructed after July 1, 1990 and has VOC emissions of greater than 15 pounds per day (see Appendix A). 326 IAC 8-2-4 establishes emissions limitations for the coating of any flat metal sheet or strips that comes in rolls or coils. Therefore, the requirements of 326 IAC 8-2-4 are applicable.

Pursuant to 326 IAC 8-2-4, no owner or operator may cause, allow or permit the discharge into the atmosphere of any VOC in excess of 2.6 pounds per gallon excluding water, as delivered to the coating applicator for prime and topcoat or single coat operations. This is an existing requirement, however, the compliance determination (below) is a new requirement in the renewal.

Based on the MSDS and calculations, the VOC content of the coatings used are greater than 2.6 pounds per gallon of coating. Therefore, the thermal oxidizer must be in operation at all times the coil coating line is in operation in order to demonstrate compliance with the 2.6 pounds per gallon limit.

In order to determine the overall efficiency of the thermal oxidizer, the equivalent emission limit must be determined first using the following equation:

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

Where: L = Applicable emissions limit from this article in pounds per gallon of coating solids, as applied (2.6 lbs)

D = Baseline of solvent density of VOC coating (7.36 lbs)

$$2.6 \text{ lbs/gal} / (1 - 2.6 / 7.36)$$

$$E = 4.06 \text{ pounds}$$

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:

$$O = \frac{V - E}{V} \times 100 = \frac{8.64 - 4.06}{8.64} \times 100 = 53\%$$

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 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 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 or equal to 53%.

This requirement will also render the requirements of 326 IAC 2-2 not applicable.

Note: Based on information provided by the source, the worst case coating used on the coating line has an actual VOC content of 8.64 pounds per gallon.

- (e) 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This rule applies to stationary sources located in Clark County that emit or have the potential to emit greater than forty (40) tons of VOC per year. In addition, this rule

applies to sources located in Clark County that have coating facilities which emit or have the potential to emit greater than ten (10) tons of VOC per year. This source is located in Clark County, has a total potential to emit 47.35 tons of VOC per year and has coil coating facilities with a potential to emit 43.55 tons of VOC per year. However, the coil coating facilities are subject to the requirements of 326 IAC 8-2-4. Therefore, pursuant to 326 IAC 8-7-2(a)(3)(A), this source is not subject to the requirements of 326 IAC 8-7 because VOC emissions from facilities subject to 326 IAC 8-2 are not included when determining whether the VOC applicability thresholds have been exceeded.

- (f) 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
This source is located in Clark County and the coil coating line was constructed after October 1, 1995. However, the organic liquids that are used in the coil coating process are not stored in stationary vessels onsite, but are pumped directly from the shipping containers that they are delivered in. Therefore, the requirements of 326 IAC 8-9 do not apply.
- (g) 326 IAC 10 (Nitrogen Oxides Control in Clark and Floyd Counties)
The coil coating line has been subject to 326 IAC 10 since it was initially permitted under MSOP 019-22695-00089, issued on September 25, 2006 because this source is located in Clark County and the entire coil coating line, including the surface coating operation, the primer curing oven, the finish curing oven and the integral thermal oxidizer is considered a facility, pursuant to 326 IAC 1-2-27 and is a source of nitrogen oxide emissions, constructed after June 12, 1996, and requires a permit under 326 IAC 2. This facility is subject to an NSPS, (40 CFR 60, Subpart TT), but this NSPS pertains to the regulation of VOC emissions from this facility rather than NOx emissions.

Pursuant to 326 IAC 10-1-1(a)(3), the Permittee shall comply with this rule or best available control technology (BACT), whichever is more stringent. This facility is not one of the types of facilities regulated in 326 IAC 10-1-4(b)(1) – (3), and the facility's potential to emit of NOx is less than 40 tons per year. Therefore, BACT is the most stringent requirement. IDEM has determined that low-NOx burners are BACT for this emissions unit. The primer curing oven and integral thermal oxidizer are equipped with low-NOx burners. The following requirements are included in the permit:

Pursuant MSOP 019-22695-00089, issued on September 25, 2006 and to 326 IAC 10-1-1(a)(3), for the primer curing oven and integral thermal oxidizer, the Permittee shall:

- (a) Utilize low-NOx burners to satisfy the requirements of BACT; and
- (b) Limit NOx emissions to less than 3.51 pounds per hour.

The pound per hour limit specified above represents the NOx emissions expected from this facility when using the AP 42 emission factor for low-NOx burners with the burners operating at their maximum heat input capacity.

Welding

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The insignificant lap seam welder fuses the coil ends together with heat welding. This process does not use any electrode and no particulate is formed. Pursuant to 326 IAC 6-3-1(b)(9), the requirements of 326 IAC 6-3-2 do not apply to this facility.

Testing Requirements

The following requirements are necessary in order to ensure that the coil coating line limit is met and the source is in compliance.

Testing Requirements			
Emission Unit	Control Device / Testing Parameter	Pollutant	Frequency for Testing
Coil Coating Line Integral Thermal Oxidizer	Thermal oxidizer / Control Efficiency	VOC	5 years from date of last valid compliance demonstration

The most recent stack test conducted for this thermal oxidizer was on July 13, 2008.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-6.1 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 2-6.1-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

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

Control	Parameter	Frequency	Specification
Thermal Oxidizer	Temperature	No less than once per fifteen (15) minutes	≥ 1275° F
Thermal Oxidizer	Duct Pressure	Minimum of once per day when thermal oxidizer is in operation	Minimum once per day when thermal oxidizer is in operation
Thermal Oxidizer	Fan Amperage	Minimum of once per day when thermal oxidizer is in operation	Minimum once per day when thermal oxidizer is in operation

These monitoring conditions are necessary because the integral thermal oxidizer must operate properly to ensure compliance with 326 IAC 8-2-4 (Volatile Organic Compounds) and 326 IAC 2-6.1 (MSOP).

Recommendation

The staff recommends to the Commissioner that the MSOP 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 December 28, 2010. Additional information was received on February 21, 2011.

Conclusion

The operation of this stationary steel coil coating operation shall be subject to the conditions of the attached MSOP Renewal No. 019-30060-00089.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Deborah Cole at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5377 or toll free at 1-800-451-6027 extension 4-5377.
- (b) A copy of the findings is available on the Internet at: <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: Emission Calculations
Potential To Emit Summary**

Company Name: Steel Dynamics, Inc.
 Address: 5134 Loop Road, Jeffersonville, Indiana 47130
 MSOP Renewal: 019-30060-00089
 Permit Reviewer: Deborah Cole
 Date: May 3, 2011

Potential to Emit Before Controls (tons/year)

Process	PM	PM10	PM2.5	SO ₂	NOx	CO	VOC	GHG	Single HAP	Combination HAPs
Alkaline Cleaning Process	13.40	13.40	13.40	0.00	0.00	0.00	0.00		0.00	0.00
Surface Coating	0.00	0.00	0.00	0.00	0.00	0.00	43.55		4.56	9.57
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.19	58.04	3.80	82,944	1.24	1.30
Welder	0.11	0.11	0.11	0.00	0.00	0.00	0.00		0.01	0.01
Surface Chemical Treatment Dip Tank*	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
Total	14.83	18.77	17.45	0.41	37.19	58.04	47.35		4.56	10.88

Potential to Emit After Controls/Limits (tons/year)

Process	PM	PM10	PM2.5	SO ₂	NOx	CO	VOC ***	GHG	Single HAP	Combination HAPs
Alkaline Cleaning Process	8.00**	0.67	0.67	0.00	0.00	0.00	0.00		0.00	0.00
Surface Coating	0.00	0.00	0.00	0.00	0.00	0.00	43.55		4.56	9.57
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.19	58.04	3.80	82,944	1.24	1.30
Welder	0.11	0.11	0.11	0.00	0.00	0.00	0.00		0.01	0.01
Surface Chemical Treatment Dip Tank*	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
Total	9.42	6.04	4.72	0.41	37.19	58.04	47.35			10.88

* No particulate is formed in this process and the solution does not contain VOC.

** This limit has been established to render the requirements of IAC 326 6.5 not applicable (entire source's actual emissions to be less than 10 tons/yr).

Note: The greatest single HAP emitted by the surface coating is 1-2-4 trimethylbenzene and the greatest single HAP emitted by combustion is hexane.

*** PTE for surface coating is after the integral oxidizer.

Appendix A: Emission Calculations
VOC and Particulate Emissions From Coil Steel Surface Coating Operations

Company Name: Steel Dynamics, Inc.
 Address: 5134 Loop Road, Jeffersonville, Indiana 47130
 MSOP Renewal: 019-30060-00089
 Permit Reviewer: Deborah Cole
 Date: May 3, 2011

Material	Density (lbs/gal)	Weight % Volatile (H ₂ O & Organics)	Weight % Water	Weight % Organics	Maximum Usage* (gals/year)	Percentage of Total Throughput	Pounds VOC per gallon of coating	Integral Oxidizer Destruction Efficiency (%)	PTE of VOC (lbs/hr)***	PTE of VOC (lbs/day)***	PTE of VOC (tons/year)***	PTE of PM/PM10/PM2.5 Before Controls** (tons/year)
Primer 45Y54	11.44	50.2%	0.00%	50.2%	637,523	100%	5.74	99%	4.18	100	18.3	0
Finish Poly-White	11.5	29.6%	0.00%	29.6%	739,922	50%	3.40	99%	2.87	69.0	12.6	0
Finish Poly-Color	9.35	32.3%	0.00%	32.3%	369,961	25%	3.02	99%	1.28	30.6	5.6	0
Finish SMP-White	10.4	35.9%	0.00%	35.9%	221,977	15%	3.74	99%	0.95	22.7	4.15	0
Finish SMP-Color	9.5	38.8%	0.00%	38.8%	73,992	5%	3.68	99%	0.31	7.46	1.36	0
Finish Kynar-White	11.5	35.9%	0.00%	35.9%	44,395	3%	4.13	99%	0.21	5.02	0.92	0
Finish Kynar-Color	9.4	46.8%	0.00%	46.8%	29,597	2%	4.38	99%	0.15	3.55	0.65	0
Totals									9.94	239	43.55	0

* Maximum Usage figures for coatings are engineering estimates submitted by the source of the amount of coatings that are used at maximum production capacity.

** Coatings are applied with rollers. Transfer efficiency is 100%. Therefore, no particulate is formed in the process of coating the steel coil.

Coil steel is 58 inches wide. Line speed is 400 feet per minute. Both sides are coated with primer and then finish in one pass through the coating line.

*** PTE is after the integral Oxidizer

METHODOLOGY

FYI: PTE before the integral oxidizer = (43.6 tons/yr)/(1-0.99) = 4,360 tons/yr

Pounds of VOC per Gallon Coating = (Density (lbs/gal) x Weight % Organics)

PTE of VOC (lbs/hr) = Density (lbs/gal) x Weight % Organics x Maximum Usage (gals/year) x 1 year/8760 days x (1- Destruction Efficiency (%))

PTE of VOC (lbs/day) = Density (lbs/gal) x Weight % Organics x Maximum Usage (gals/year) x 1 year/8760 days x (1- Destruction Efficiency (%)) x 24 hrs/day

PTE of VOC (tons/year) = Density (lbs/gal) x Weight % Organics x Maximum Usage (gals/year) x 1 ton/2,000 lbs x (1- Destruction Efficiency (%))

Appendix A: Emission Calculations
HAP Emissions From Coil Steel Surface Coating Operations

Company Name: Steel Dynamics, Inc.

Address: 5134 Loop Road, Jeffersonville, Indiana 47130

MSOP Renewal: 019-30060-00089

Permit Reviewer: Deborah Cole

Date: May 3, 2011

Material	Density (lbs/gal)	Maximum Usage* (gals/year)	Weight % 1-2-4-Trimethyl benzene	Weight % Ethyl benzene	Weight % Xylene	Weight % Naphthalene	Weight % Butoxy ethoxyethyl Acetate	Weight % Butyl carbitol Acetate	Weight % Isophorone	Weight % Diethylene Glycol Butyl Ether Acetate	Weight % Form-aldehyde	Weight % Propyl Cellosolve
Primer 45Y54	11.44	637,523	3.4%	1.0%	4.2%	1.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Finish Poly-White	11.5	739,922	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Finish Poly-Color	9.35	369,961	0.0%	2.2%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Finish SMP-White	10.4	221,977	4.7%	0.1%	1.0%	0.0%	8.7%	0.0%	0.0%	0.0%	0.0%	0.0%
Finish SMP-Color	9.5	73,992	2.6%	0.3%	1.1%	2.0%	0.0%	1.9%	0.0%	0.0%	0.0%	0.0%
Finish Kynar-White	11.5	44,395	0.0%	1.5%	6.4%	0.0%	4.5%	0.0%	19.0%	0.0%	0.0%	0.0%
Finish Kynar-Color	9.4	29,597	0.0%	0.0%	1.6%	2.2%	0.0%	0.0%	0.0%	2.5%	0.4%	1.8%

Potential to Emit of HAPs (tons/year)

Material	Density (lbs/gal)	Maximum Usage* (gals/year)	PTE of 1-2-4-Trimethyl benzene	PTE of Ethyl benzene	PTE of Xylene	PTE of Naphthalene	PTE of Butoxy ethoxyethyl Acetate	PTE of Butyl carbitol Acetate	PTE of Isophorone	PTE of Diethylene Glycol Butyl Ether Acetate	PTE of Form-aldehyde	PTE of Propyl Cellosolve
Primer 45Y54	11.44	637,523	124	36.5	153	43.8	0.0	0.0	0.0	0.0	0.0	0.0
Finish Poly-White	11.5	739,922	268	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Finish Poly-Color	9.35	369,961	0.0	38.1	0.0	5.19	0.0	0.0	0.0	0.0	0.0	0.0
Finish SMP-White	10.4	221,977	54.8	1.62	11.9	0.0	100	0.0	0.0	0.0	0.0	0.0
Finish SMP-Color	9.5	73,992	9.12	1.05	3.86	7.01	0.0	6.66	0.0	0.0	0.0	0.0
Finish Kynar-White	11.5	44,395	0.0	3.86	16.5	0.0	11.5	0.0	48.5	0.0	0.0	0.0
Finish Kynar-Color	9.4	29,597	0.0	0.0	2.21	3.04	0.0	0.0	0.0	3.46	0.55	2.49
Total PTE of HAP (tons/year)			4.56	0.81	1.88	0.59	1.12	0.07	0.49	0.03	0.01	0.02

* Maximum Usage figures for coatings are based on engineering estimates of the amount of coatings that are used at maximum production capacity. The PTE of HAPs is calculated after the effect of the integral thermal oxidizer. The destruction efficiency (%) for HAPs is 98%.

METHODOLOGY

PTE of HAPS Before Controls (tons/year) = Density (lbs/gal) x Maximum Usage (gals/year) x Weight % HAP x 1 ton/2000 lbs x (1- Destruction Efficiency %)

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

**Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
MSOP Renewal: 019-30060-00089
Permit Reviewer: Deborah Cole
Date: May 3, 2011**

Emission Unit Description	Heat Input Capacity (MMBtu/hour)	Maximum Potential Throughput (MMCF/year)
Annealing Furnace: Preheat Section	56.0	481
Annealing Furnace: Radiant Tube Section	21.0	180
Cleaner Heater	5.3	45.5
Rinse Water Heater	3.0	25.8
Cleaner Dryer Heater	2.0	17.2
Chem Treat Dryer	2.0	17.2
Primer Curing Oven	11.6	100
Thermal Oxidizer	60.0	515
		1382

	Pollutant Emission Factors (lbs/MMCF)							HAPs
	PM*	PM10*	PM2.5	SO ₂	NOx**	CO	VOC	
Low-NOx Annealing Furnace Burners	1.9	7.6	5.7	0.6	50	84.0	5.5	1.89
Low-NOx Curing Oven and Thermal Oxidizer Burners	1.9	7.6	5.7	0.6	50	84.0	5.5	1.89
All Other Combustion	1.9	7.6	5.7	0.6	100	84.0	5.5	1.89

Emission Unit ID	Potential To Emit (tons/year)							
	PM	PM10	PM2.5	SO ₂	NOx	CO	VOC	HAPs
Annealing Furnace: Preheat Section	0.46	1.83	1.37	0.14	12.0	20.2	1.32	0.45
Annealing Furnace: Radiant Tube Section	0.17	0.69	0.51	0.05	4.51	7.57	0.50	0.17
Cleaner Heater	0.04	0.17	0.13	0.01	2.28	1.91	0.13	0.04
Rinse Water Heater	0.02	0.10	0.07	0.01	1.29	1.08	0.07	0.02
Cleaner Dryer Heater	0.02	0.07	0.05	0.01	0.86	0.72	0.05	0.02
Chem Treat Dryer	0.02	0.07	0.05	0.01	0.86	0.72	0.05	0.02
Primer Curing Oven	0.09	0.38	0.28	0.03	2.49	4.18	0.27	0.09
Thermal Oxidizer	0.49	1.96	1.47	0.15	12.9	21.6	1.42	0.49
TOTALS	1.31	5.25	3.94	0.41	37.2	58.0	3.80	1.30

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

**Emission factors for NOx: Uncontrolled = 100 lb/MMCF, Low NOx burners = 50 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

Maximum Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hour) x 8,760 (hours/year) x 1 MMCF/1,020 MMBtu

PTE (tons/year) = Max. Potential Throughput (MMCF/year) x Emission Factor (lbs/MMCF) x 1 ton/2,000 lbs

Natural Gas Combustion Only

MM BTU/HR <100

Greenhouse Gas Emissions

Company Name: Steel Dynamics, Inc.

Address: 5134 Loop Road, Jeffersonville, Indiana 47130

MSOP Renewal: 019-30060-00089

Permit Reviewer: Deborah Cole

Date: May 3, 2011

	Greenhouse Gas		
	CO2	CH4	N2O
Emission Factor in lb/MMcf	120,000	2.3	2.2
Potential Emission in tons/yr	82,911	1.6	0.0
Summed Potential Emissions in tons/yr	82,912		
CO2e Total in tons/yr	82,944		

Methodology

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

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

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).

Appendix A: Emission Calculations

Particulate Emissions From Alkaline Cleaning Process on Hot Dip Galvanizing Line

Company Name: Steel Dynamics, Inc.
 Address: 5134 Loop Road, Jeffersonville, Indiana 47130
 MSOP Renewal: 019-30060-00089
 Permit Reviewer: Deborah Cole
 Date: May 3, 2011

Location	Control Device ID	Outlet Grain Loading (gr/dscf)	Maximum Air Flow Rate (scfm)	Control Efficiency* (%)	PTE of PM/PM10 After Control (lbs/hour)	PTE of PM/PM10 After Control (tons/year)	PTE of PM/PM10 Before Control (lbs/hour)	PTE of PM/PM10 Before Control (tons/year)
Alkaline Cleaning Process	Demister	0.0017	10,500	95.0%	0.15	0.67	3.06	13.4

Assume all PM emissions equal PM10 emissions.

The outlet grain loading of the demister was established in a stack test conducted at the source on November 16, 2000. IDEM, CDS approved these results and deemed the facility to be in compliance with the applicable regulations.

* The control efficiency was not determined during the stack test conducted at the source on November 16, 2000. Therefore, the control efficiency is based on an engineering estimate.

Methodology

PTE of PM/PM10 After Control (lbs/hour) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (mins/hour) x 1/7000 (lbs/gr)

PTE of PM/PM10 After Control (tons/year) = Grain Loading (gr/dscf) x Max. Air Flow Rate (scfm) x 60 (mins/hour) x 1/7000 (lbs/gr) x 8760 (hours/year) x 1 ton/2000 lbs

PTE of PM/PM10 Before Control (lbs/hour) = PTE of PM/PM10 After Control (lbs/hour) / (1-Control Efficiency%)

PTE of PM/PM10 Before Control (tons/year) = PTE of PM/PM10 After Control (tons/year) / (1-Control Efficiency%)

326 IAC 6-3-2(a) Allowable Rate of Emissions

Unit ID	Process Rate (materials throughput (lbs/hour))	Process Weight Rate (tons/hr)	Allowable PM Emissions (lbs/hr)	Allowable PM Emissions (tons/yr)
Alkaline Cleaning Process Blower	148,000	74.00	48.30	211.57

Methodology

Allowable Emissions (E)(lb/hr) = 55 (Process Weight Rate) ^ 0.11 - 40

Allowable Emissions (tons/yr) = (Allowable Emissions (lb/hr) * 8760) / 2000

**Appendix A: Emission Calculations
Particulate and HAP Emissions from Welding Operations**

Company Name Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
MSOP Renewal: 019-30060-00089
Permit Reviewer: Deborah Cole
Date: May 3, 2011

Type of Welder	# of Welding Stations	Maximum Electrode Usage Rate (lbs/hr/welder)	PM/PM10 Emission Factor (lbs PM10/1,000 lbs electrode)	Manganese Emission Factor (lbs Mn/1,000 lbs electrode)	PTE of PM/PM10 Uncontrolled (lbs/hr)	PTE of PM/PM10 Uncontrolled (tons/yr)	PTE of Manganese Uncontrolled (tons/yr)	Control Efficiency (%)	PTE of PM/PM10 Controlled (tons/yr)	PTE of Manganese Controlled (tons/yr)
Robotic High Frequency	1	5	5.2	0.318	0.03	0.11	0.01	0%	0.11	0.01

Assume all PM emissions are equal to PM10.
Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95).

Methodology

PTE PM/PM10/Mn Uncontrolled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs
PTE PM/PM10/Mn Controlled (tons/yr) = # of Welding Stations x Electrode Usage x Emission Factor (lbs/1,000 lbs electrode) x 8760 (hrs/yr) x 1 ton/2,000 lbs x (1 - Control Efficiency %)



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: Douglas McGregor
Steel Dynamics, Inc.
4500 CR 59
Butler, IN 46721

DATE: December 15, 2011

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

SUBJECT: Final Decision
MSOP Renewal
019-30060-00089

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:
Glenn Pushis, VP, Responsible Official
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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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December 15, 2011

TO: Jefferson Twp. Public Library

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

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

Applicant Name: Steel Dynamics, Inc.
Permit Number: 019-30080-00089

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

Mail Code 61-53

IDEM Staff	PWAY 12/14/2011 Steel Dynamics, Inc. (SDI) 019-30060-00089 (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		Douglas McGregor Steel Dynamics, Inc. (SDI) 4500 CR 59 Butler IN 46721 (Source CAATS)									
2		Glenn Pushis VP / GM - Flat Roll Div Steel Dynamics, Inc. (SDI) 4500 CR 59 Butler IN 46721 (RO CAATS)									
3		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)									
4		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)									
5		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)									
6		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)									
7		Jeffersonville Twp Public 211 E Court Ave, P.O. Box 1548 Jeffersonville IN 47131-1548 (Library)									
8		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)									
9		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)									
10		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)									
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