



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

TO: Interested Parties / Applicant

DATE: July 19, 2013

RE: Industrial Steel Construction, Inc. / 089-32762-00161

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

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

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

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

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



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Mr. Daniel Moore
Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, IN 46404

July 19, 2013

Re: 089-32762-00161
Significant Permit Modification to
Part 70 Renewal No.: T089-29933-00161

Dear Mr. Moore:

Industrial Steel Construction, Inc. was issued a Part 70 Operating Permit Renewal No. 089-29933-00161 on June 11th, 2011 for a stationary miscellaneous metal working and bridge beam fabrication source located at 86 North Bridge Street, Gary, Indiana. An application requesting changes to this permit was received on January 17th, 2013. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

For your convenience, the entire Part 70 Operating Permit Renewal as modified is attached.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Brian Williams, of my staff, at 317-234-5375 or 1-800-451-6027, and ask for extension 4-5375.

Sincerely,

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachment(s): Updated Permit, Technical Support Document and Appendix A

IC/BMW

cc: File - Lake County
Lake County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section
Northwest Regional Office



A State that Works



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Thomas W. Easterly
Commissioner

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

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

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

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

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

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

First Significant Permit Modification No: 089-30910-00161, issued on January 17, 2012

Second Significant Permit Modification No: 089-32762-00161	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: July 19, 2013 Expiration Date: July 11, 2016



TABLE OF CONTENTS

A. SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-(5)(14)][326 IAC 2-7-1(22)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-(5)(14)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]
[326 IAC 2-7-(5)(14)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B. GENERAL CONDITIONS

- B.1 Definitions [326 IAC 2-7-1]
- B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)]
[IC 13-15-3-6(a)]
- B.3 Term of Conditions [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]
- B.5 Severability [326 IAC 2-7-5(5)]
- B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]
- B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]
- B.11 Emergency Provisions [326 IAC 2-7-16]
- B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
- B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]
- B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]
- B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]
- B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]
- B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12(b)(2)]
- B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]
- B.20 Source Modification Requirement [326 IAC 2-7-10.5]
- B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
- B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]
- B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

C. SOURCE OPERATION CONDITIONS

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

- C.1 Opacity [326 IAC 5-1]
- C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Stack Height [326 IAC 1-7]
- C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- C.7 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

- C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]
- C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

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

- C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]
- C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6][40 CFR 64]
[326 IAC 3-8]
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
- C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

- C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1. EMISSIONS UNIT OPERATION CONDITIONS

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

- D.1.1 PSD Minor Limits [326 IAC 2-2]
- D.1.2 Particulate Matter Emission Limitations (PM) [326 IAC 6.8-1-2]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(5)(c)][326 IAC 2-1.1-11]
- D.1.5 Particulate Matter (PM)

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

- D.1.6 Visible Emissions Notations [326 IAC 2-7-6] [40 CFR 64]
- D.1.7 Parametric Monitoring [40 CFR 64]
- D.1.8 Broken or Failed Bag Detection [40 CFR 64]

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

- D.1.9 Record Keeping Requirement
- D.1.10 Reporting Requirements

D.2. EMISSIONS UNIT OPERATION CONDITIONS

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

- D.2.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]
- D.2.2 Emission Offset Minor Limits [326 IAC 2-3]
- D.2.3 Particulate Matter (PM) [326 IAC 6.8-1-2]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.2.5 Volatile Organic Compounds (VOC)
- D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)]

- D.2.7 Particulate Matter (PM) Control
- D.2.8 Testing Requirements [326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]

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

- D.2.9 Parametric Monitoring [40 CFR 64]
- D.2.10 Monitoring

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

- D.2.11 Record Keeping Requirements
- D.2.12 Reporting Requirements

D.3. EMISSIONS UNIT OPERATION CONDITIONS

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

- D.3.1 PSD Minor Limits [326 IAC 2-2]
- D.3.2 Particulate Matter Emission Limitation (PM) [326 IAC 6.8-1-2]
- D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

Compliance Determination Requirements

- D.3.4 Particulate Matter (PM)
- D.3.5 Testing Requirements [326 IAC 2-7-6(5)(c)] [326 IAC 2-1.1-11]

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

- D.3.6 Visible Emissions Notations [326 IAC 2-7-6] [40 CFR 64]
- D.3.7 Parametric Monitoring [40 CFR 64]
- D.3.8 Broken or Failed Bag Detection [40 CFR 64]

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

- D.3.9 Record Keeping Requirements

D.4. EMISSIONS UNIT OPERATION CONDITIONS

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

- D.4.1 Particulate Matter (PM) [326 IAC 6.8-1-2]
- D.4.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]
- D.4.3 Volatile Organic Compounds (VOCs) [326 IAC 8-3-8]

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

- D.4.4 Record Keeping Requirements

E.1. EMISSIONS UNIT OPERATION CONDITIONS

National Emission Standards for Hazardous Air Pollutants [326 IAC 2-7-5(1)]

- E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAPs) [326 IAC 20-1-1][40 CFR 63, Subpart XXXXXX]
- E.1.2 National Emission Standard for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX]

Certification
Emergency Occurrence Report
Quarterly Reports
Quarterly Deviation and Compliance Monitoring Report

Attachment A - 40 CFR 63 Subpart XXXXXX

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-(5)(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary miscellaneous metal working and bridge beam fabrication source.

Source Address:	86 North Bridge Street, Gary, Indiana 46404
General Source Phone Number:	219-885-7600
SIC Code:	3441 & 3449
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 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 [326 IAC 2-7-4(c)(3)][326 IAC 2-7-(5)(14)]

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

#1 Blaster Conveyor Line

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

Annex

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

Girder Shop

- (c) One (1) paint booth, identified as EU #15, installed in 1997, exhausting to general ventilation and using no emission control devices;
- (d) Electric arc stick welding, identified as EU #9, installed in 2001, with a maximum capacity of 2.477 pounds of rods per minute;
- (e) Oxy Methane Cutting, including forty-seven (47) torches exhausting inside the building and two (2) DB torches equipped with smoke eliminators, collectively identified as EU #13, installed in 1998, which equals a total of forty-nine (49) torches operational;
- (f) One (1) blaster #3, identified as EU #18, installed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18;
- (g) One (1) mechanical blaster #5, identified as EU #21, installed in 2006, equipped with a

baghouse identified as #21 for particulate matter control and exhausting through Stack # 11. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot;

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

Grinding

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

“A” Building

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

Bay #8 West

- (n) One (1) mechanical blaster #6, identified as EU #23, approved for construction in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-(5)(14)]

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

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

- (d) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
 - (2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2]
- (e) Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding. [326 IAC 6.8-1-2]

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

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

- (a) The Part 70 Operating permit, T089-29933-00161, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

- (1) it contains a certification by a "responsible official", as defined by 326 IAC 2-7-1(35), and
 - (2) the certification is based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][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 specified in Section D, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northwest Regional Office no later than four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

No later than two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T089-29933-00161 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.

[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the reasonable deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b) or (c). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

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

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.5 Stack Height [326 IAC 1-7]

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

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

C.7 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (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. The extension request submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]

- (a) Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

- (b) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
- (c) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6] [40 CFR 64] [326 IAC 3-8]

- (l) 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 necessarily 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.
- (II)
- (a) *CAM Response to excursions or exceedances.*
 - (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
 - (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) *CAM recordkeeping requirements.*
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the

adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit no later than July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the Part 70 permit.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-(5)(14)]:

#1 Blaster Conveyor Line

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

Annex

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

Girder Shop

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

Grinding

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

Bay #8 West

- (n) One (1) mechanical blaster #6, identified as EU #23, approved for construction in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot.

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

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

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following requirements:

- (a) The PM, PM₁₀, and PM_{2.5} emissions from the following processes shall not exceed the emission limits listed in the table below:

Process	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Mechanical Blaster #1 (EU #1)	Baghouse #1	1.75	1.75	1.75
Mechanical Blaster #4 (EU#2)	Baghouse #2	0.59	0.59	0.59
Mechanical Blaster #3 (EU #18)	Baghouse #18	0.58	0.58	0.58
Mechanical Blaster #5 (EU #21)	Baghouse #21	2.00	2.00	2.00
Mechanical Blaster #6 (EU #23)	Baghouse #23	1.50	1.50	1.50

- (b) The amount of steel slab from the three (3) slab grinders, identified as EU #11 to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month.
- (c) The PM emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM emissions from the steel slab to be less than 98.6 tons per year.
- (d) The PM10 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM10 emissions from the steel slab to be less than 98.6 tons per year.
- (e) The PM2.5 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM2.5 emissions from the steel slab to be less than 98.6 tons per year.

Compliance with these limits combined with Condition D.3.1 and the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The particulate matter (PM) emissions from the emission units, identified as EU #1, EU #2, EU #9, EU #11, EU #13 EU #18, EU #21, EU #17, and EU #23 shall not exceed 0.03 grains per dry standard cubic foot, each.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #17, EU #18, EU #21, and EU #23, and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

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

- (a) No later than five (5) years after the most recent valid compliance demonstration, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on one of the mechanical blasters, EU #1 (blaster #1), EU #2 (blaster #4), EU #18 (blaster #3), or EU #21 (blaster #5) to verify compliance with Conditions D.1.1 and D.1.2, utilizing methods as approved by the Commissioner. These tests shall be repeated on a different blaster and control device at least once every five (5) years from the date of the most recent valid compliance demonstration. The blaster tested shall be the blaster in which the longest amount of time has elapsed since its previous test. 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.
- (b) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on EU #23 (blaster #6) no later than sixty (60) days after achieving maximum capacity but not later than one hundred eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.

D.1.5 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses shall be in operation and control emissions from the EU #1, EU #2, EU #18, EU #21, and EU #23 (blasters #1, #4, #3, #5, and #6) at all times that the blasting processes are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also included the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (c) The smoke eliminators associated with the two (2) DB torches in EU #13 shall be in operation at all times that the DB torches are in operation.

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

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

- (a) Visible emission notations of the stack exhaust from blaster EU#1, EU#2, EU#18 and EU#21 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) Visible emission notations of the DB torches smoke eliminator exhausts in EU #13 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not

counting startup or shut down time.

- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

D.1.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the blasting processes, at least once per day when the blasting processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses for blasters EU #1 (blaster #1), EU #2 (blaster #4), EU #18 (blaster #3), EU #21 (blaster #5), EU #23 (blaster #6) is outside the normal range, the Permittee shall take reasonable response. The normal range for EU #1 (blaster #1) is a pressure drop range between 2.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. The normal range for EU #2 (blaster #4) and EU #23 (blaster #6) is a pressure drop range between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. The normal range for EU #18 (blaster #3) and EU #21 (blaster #5) is a pressure drop range between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated or replaced at least once every six (6) months.

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

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

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

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1(b) - PSD Minor Limits, the Permittee shall keep monthly records of the amount of steel slab ground by the three (3) slab grinders.
- (b) To document the compliance status with Condition D.1.6 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the four (4) blaster, EU#11 and the two (2) DB torch smoke eliminator stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7– Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses for units EU#1, EU#2, EU#18, EU#21, and EU#23. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Condition D.1.1(b) shall be submitted using the reporting forms located at the end of this permit, or their equivalent not later than thirty (30) days following the end of each calendar quarter being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-(5)(14)]:

Girder Shop

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

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

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

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

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

D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #15 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #22 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.
- (c) Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating Operations), one (1) or a combination of the following equipment shall be used for coating application in the two (2) paint booths, identified as EU #15 and EU #22:
 - Electrostatic equipment
 - High volume low-pressure (HVLP) spray equipment
 - Flow coating
 - Roller coating
 - Dip coating, including electrodeposition
 - Airless spray
 - Air-assisted airless spray
 - Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying
- (d) Pursuant to 326 IAC 8-2-9(d)(3), the thermal oxidizer for the paint booth, identified as EU #20 shall achieve an overall VOC control efficiency of equal to or greater than ninety percent (90%).

- (e) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
- (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

D.2.2 Emission Offset Minor Limits [326 IAC 2-3]

The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #20, and EU #22, shall be limited such that the VOC emissions shall not exceed 96.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-3 (Emission Offset) not applicable.

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

- (a) Pursuant to 326 IAC 6.8-1-2(h), particulate from the paint booths, identified as EU #15 and EU #22, shall be controlled by dry particulate filters, waterwash, or an equivalent control device. The Permittee shall use the following work practices as an equivalent control device:
- (1) Conduct all spray coating operations within an enclosed building;
 - (2) Close man doors, overhead doors and powered vents located within 100 feet of the spray equipment, and keep them closed during spray operations;
 - (3) Collect dry-fall paint on floor surfaces; and
 - (4) Collect and dispose dry-fall paint from floor surfaces to prevent re-entrainment to exhaust air.
- (b) Pursuant to 326 IAC 6.8-1-2(h), particulate from the paint booth, identified as EU #20, shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.2.5 Volatile Organic Compounds (VOC)

In order to comply with Conditions D.2.1(d), D.2.1(e), and D.2.2, the Permittee shall operate the thermal oxidizer at all times that the paint booth, identified as EU #20 is in operation.

D.2.6 Volatile Organic Compounds (VOCs) [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)]

- (a) Compliance with the VOC limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) When using non-compliant coatings, compliance with the VOC content limit in Conditions D.2.1(a) and D.2.1(b) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis for the two paint booths, identified as EU #15 and EU #22.

The daily volume weighted average for each paint booth shall be determined by the following equation:

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

Where:

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

- (c) Compliance with Condition D.2.2 shall be determined no later than 30 days after the end of each month. For a particular month, this shall be based on the total volatile organic compounds emitted for that month added to the previous eleven (11)-month total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:

$$\begin{aligned} \text{Total VOC Emissions} = & \text{[(VOC Input EU \#15)]} \\ & + \text{[(VOC Input EU \#20) * ((100 - \% \text{ overall control efficiency} \\ & \text{from the most recent valid stack test)/100)]} \\ & + \text{[(VOC Input EU \#22)]} \end{aligned}$$

D.2.7 Particulate Matter (PM) Control

The dry filter for particulate matter (PM) control shall be in operation and control emissions from the paint booth, identified as EU #20, at all times that the paint booth is in operation.

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

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

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

D.2.9 Parametric Monitoring [40 CFR 64]

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

D.2.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the paint booth, identified as EU #20 while the booth is in operation. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Response to Excursions or Exceedances for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Section C - Response to Excursion or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

- (c) Weekly observations shall be made of the overspray from the paint booths, identified as EU #15 and EU #22 while these booths are in operation. If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

D.2.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content and usage limits, and the VOC emission limits established in Conditions D.2.1 and D.2.2.
- (1) The amount of VOC in each coating material and solvent used.
 - (2) The amount of coating material and solvent less water used on a daily and monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The volume weighted VOC content of the coating used for each day;
 - (4) The cleanup solvent usage for each day and for each month;
 - (5) The total VOC usage for each day and each month.
 - (6) The total weight of VOC emitted for each compliance period.
- (b) To document compliance with Conditions D.2.9, the Permittee shall maintain:
- (1) Continuous temperature records and 3 hour average temperature records.
 - (2) The fan amperage reading.
- (c) To document the compliance status with Condition D.2.10, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its record when an inspection is not taken and the reason for the lack of inspection (e.g. the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

D.2.12 Reporting Requirements

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

as defined by 326 IAC 2-7-1(35).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-(5)(14)]:

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

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

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

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

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following requirements:

- (a) The PM emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.
- (b) The PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.
- (c) The PM_{2.5} emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.

Compliance with these limits combined with Condition D.1.1 and the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

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

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

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

Compliance Determination Requirements

D.3.4 Particulate Matter (PM)

- (a) In order to comply with Conditions D.3.1 and D.3.2, the baghouse for PM control shall be in operation and control emissions from the mechanical blaster/blowoff, identified as EU#19, at all times that the mechanical blaster/blowoff is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

No later than five (5) years after the most recent valid compliance demonstration, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on EU #19 (mechanical blaster/blowoff) to verify compliance with Conditions D.3.1 and D.3.2, utilizing methods as approved by the Commissioner. These tests 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.

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

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

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

D.3.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per day when the mechanical blaster/ blowoff process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse for mechanical blaster/blowoff is outside the normal range the Permittee shall take reasonable response. The normal range for EU #19 (mechanical blaster/blowoff) is a pressure drop range between 1.5 and 6.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months.

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

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

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

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

D.3.9 Record Keeping Requirements

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

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-(5)(14)]: - Insignificant Activities

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

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

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

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

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

D.4.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall ensure the following control equipment and operating requirements are met for the four (4) parts washers, identified as EU #12:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

- (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met the four (4) parts washers, identified as EU #12:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.4.3 Volatile Organic Compounds (VOC) [326 8-3-8]

Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

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

D.4.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.3, the Permittee shall maintain each of the following records for each purpose:
 - (1) The name and address of the solvent supplier.

- (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).
 - (6) All records required by Condition D.4.4(a)(1) through (5) shall be:
 - (A) retained on-site or accessible electronically from the site for the most recent three (3) year period; and
 - (B) reasonably accessible for an additional two (2) year period.
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.

SECTION E.1

EMISSION UNIT OPERATION CONDITIONS

Emission Units Description [326 IAC 2-7-(5)(14)]: - The Source

(a) The source

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

National Emission Standards for Hazardous Air Pollutants [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants (NESHAPs) [326 IAC 20-1-1][40 CFR 63, Subpart XXXXXX]

- (a) The Permittee shall comply with the provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the emission units described in this section except when otherwise specified in 40 CFR 63, Subpart XXXXXX.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX]

Pursuant to 40 CFR 63, Subpart XXXXXX (included as Attachment A of this permit), the Permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories because it is operating in an area source that is primarily engaged in the operations of Fabric Structural Metal Manufacturing for the source's emission units as specified as follows:

- | | |
|------------------------|-----------------------|
| (1) 63.11514 (a)(4) | (12) 63.11519(a) |
| (2) 63.11514 (b)(1-3) | (13) 63.11519(b)(1) |
| (3) 63.11514 (b)(5) | (14) 63.11519(b)(3-5) |
| (4) 63.11514 (c) | (15) 63.11519(c)(1-2) |
| (5) 63.11515 (a) | (16) 63.11519(c)(13) |
| (6) 63.11516(a)(2-3) | (17) 63.11519(c)(15) |
| (7) 63.11516(b) | (18) 63.11521 |
| (8) 63.11516(f)(2)(ii) | (19) 63.11522 |
| (9) 63.11516(f)(2)(v) | (20) 63.11523 |
| (10) 63.11516(f)(3-4) | (21) Table 1 |
| (11) 63.11517(a-b) | (22) Table 2 |

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

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

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

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

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), no later than four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile no later than two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

Quarterly Report

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

YEAR: _____

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

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

Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-29933-00161
Facility: Three (3) paint booths, EU #15, EU #20, and EU #22
Parameter: VOC Emissions
Limit: The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #20, and EU #22, shall be limited such that the VOC emissions shall not exceed 96.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

YEAR: _____

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

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

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

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Indiana Department of Environmental Management
Office of Air Quality
Attachment A: 40 CFR 63, Subpart XXXXXX

Source Description and Location
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Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, IN 46404
County:	Lake
SIC Code:	3441, 3449
Operation Permit No.:	T T089-29933-00161
Operation Permit Issuance Date:	July 11, 2011
Significant Permit Modification No.:	089-30910-00161
Permit Reviewer:	Anh Nguyen

e-CFR Data is current as of January 12, 2010

Title 40: Protection of Environment

[PART 63—NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES](#)

Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

Source: 73 FR 43000, July 23, 2008, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11514 Am I subject to this subpart?

(a) You are subject to this subpart if you own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of this section. Descriptions of these source categories are shown in Table 1 of this subpart. “Primarily engaged” is defined in §63.11522, “What definitions apply to this subpart?”

- (1) Electrical and Electronic Equipment Finishing Operations;
- (2) Fabricated Metal Products;
- (3) Fabricated Plate Work (Boiler Shops);
- (4) Fabricated Structural Metal Manufacturing;
- (5) Heating Equipment, except Electric;
- (6) Industrial Machinery and Equipment Finishing Operations;
- (7) Iron and Steel Forging;
- (8) Primary Metal Products Manufacturing; and
- (9) Valves and Pipe Fittings.

(b) The provisions of this subpart apply to each new and existing affected source listed and defined in paragraphs (b)(1) through (5) of this section if you use materials that contain or have the potential to emit metal fabrication or finishing metal HAP (MFHAP), defined to be the compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form with the exception of lead. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

(1) A dry abrasive blasting affected source is the collection of all equipment and activities necessary to perform dry abrasive blasting operations which use materials that contain MFHAP or that have the potential to emit MFHAP.

(2) A machining affected source is the collection of all equipment and activities necessary to perform machining operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or that have the potential to emit MFHAP.

(3) A dry grinding and dry polishing with machines affected source is the collection of all equipment and activities necessary to perform dry grinding and dry polishing with machines operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(4) A spray painting affected source is the collection of all equipment and activities necessary to perform spray-applied painting operations using paints which contain MFHAP. A spray painting affected source includes all equipment used to apply cleaning materials to a substrate to prepare it for paint application (surface preparation) or to remove dried paint; to apply a paint to a substrate (paint application) and to dry or cure the paint after application; or to clean paint operation equipment (equipment cleaning). Affected source(s) subject to the requirements of this paragraph are not subject to the miscellaneous surface coating provisions of subpart HHHHHH of this part, "National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources."

(5) A welding affected source is the collection of all equipment and activities necessary to perform welding operations which use materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or have the potential to emit MFHAP.

(c) An affected source is existing if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, before April 3, 2008.

(d) An affected source is new if you commenced construction or reconstruction of the affected source, as defined in §63.2, "General Provisions" to part 63, on or after April 3, 2008.

(e) This subpart does not apply to research or laboratory facilities, as defined in section 112(c)(7) of the Clean Air Act (CAA).

(f) This subpart does not apply to tool or equipment repair operations, facility maintenance, or quality control activities as defined in §63.11522, "What definitions apply to this subpart?"

(g) This subpart does not apply to operations performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), the National Aeronautics and Space Administration, or the National Nuclear Security Administration.

(h) This subpart does not apply to operations that produce military munitions, as defined in §63.11522, "What definitions apply to this subpart?", manufactured by or for the Armed Forces of the United States (including the Coast Guard and the National Guard of any such state), or equipment directly and exclusively used for the purposes of transporting military munitions.

(i) You are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided you are not otherwise required by law to obtain a permit under 40 CFR 70.3(a) or 40 CFR 71.3(a). Notwithstanding the previous sentence, you must continue to comply with the provisions of this subpart.

§ 63.11515 What are my compliance dates?

(a) If you own or operate an existing affected source, you must achieve compliance with the applicable provisions in this subpart by July 25, 2011.

(b) If you own or operate a new affected source, you must achieve compliance with the applicable provisions in this subpart by July 23, 2008, or upon startup of your affected source, whichever is later.

Standards and Compliance Requirements

§ 63.11516 What are my standards and management practices?

(a) *Dry abrasive blasting standards.* If you own or operate a new or existing dry abrasive blasting affected source, you must comply with the requirements in paragraphs (a)(1) through (3) of this section, as applicable, for each dry abrasive blasting operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when abrasive blasting operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) *Standards for dry abrasive blasting of objects performed in totally enclosed and unvented blast chambers.* If you own or operate a new or existing dry abrasive blasting affected source which consists of an abrasive blasting chamber that is totally enclosed and unvented, as defined in §63.11522, "What definitions apply to this subpart?", you must implement management practices to minimize emissions of MFHAP. These management practices are the practices specified in paragraph (a)(1)(i) and (ii) of this section.

(i) You must minimize dust generation during emptying of abrasive blasting enclosures; and

(ii) You must operate all equipment associated with dry abrasive blasting operations according to the manufacturer's instructions.

(2) *Standards for dry abrasive blasting of objects performed in vented enclosures.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which has a vent allowing any air or blast material to escape, you must comply with the requirements in paragraphs (a)(2)(i) and (ii) of this section. Dry abrasive blasting operations for which the items to be blasted exceed 8 feet (2.4 meters) in any dimension, may be performed subject to the requirements in paragraph (a)(3) of this section.

(i) You must capture emissions and vent them to a filtration control device. You must operate the filtration control device according to manufacturer's instructions, and you must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "What are my notification, recordkeeping, and reporting requirements?"

(ii) You must implement the management practices to minimize emissions of MFHAP as specified in paragraphs (a)(2)(ii)(A) through (C) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose dusty abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive materials; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions.

(3) *Standards for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension.* If you own or operate a new or existing dry abrasive blasting affected source which consists of a dry abrasive blasting operation which is performed on objects greater than 8 feet (2.4 meters) in any one dimension, you may implement management practices to minimize emissions of MFHAP as specified in paragraph (a)(3)(i) of this section instead of the practices required by paragraph (a)(2) of this section. You must demonstrate that management practices are being implemented by complying with the requirements in paragraphs (a)(3)(ii) through (iv) of this section.

(i) Management practices for dry abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension are specified in paragraphs (a)(3)(i)(A) through (E) of this section.

(A) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(B) You must enclose abrasive material storage areas and holding bins, seal chutes and conveyors that transport abrasive material; and

(C) You must operate all equipment associated with dry abrasive blasting operations according to manufacturer's instructions; and

(D) You must not re-use dry abrasive blasting media unless contaminants (i.e., any material other than the base metal, such as paint residue) have been removed by filtration or screening, and the abrasive material conforms to its original size; and

(E) Whenever practicable, you must switch from high particulate matter (PM)-emitting blast media (e.g., sand) to low PM-emitting blast media (e.g., crushed glass, specular hematite, steel shot, aluminum oxide), where PM is a surrogate for MFHAP.

(ii) You must perform visual determinations of fugitive emissions, as specified in §63.11517(b), "What are my monitoring requirements?", according to paragraphs (a)(3)(ii)(A) or (B) of this section, as applicable.

(A) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors, you must perform visual determinations of fugitive emissions at the fenceline or property border nearest to the outdoor dry abrasive blasting operation.

(B) For abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed indoors, you must perform visual determinations of fugitive emissions at the primary vent, stack, exit, or opening from the building containing the abrasive blasting operations.

(iii) You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), "What are my notification, recordkeeping, and reporting requirements?"

(iv) If visible fugitive emissions are detected, you must perform corrective actions until the visible fugitive emissions are eliminated, at which time you must comply with the requirements in paragraphs (a)(3)(iv)(A) and (B) of this section.

(A) You must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), "Monitoring Requirements."

(B) You must report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, with your annual certification and compliance report as required by §63.11519(b)(5), "Notification, recordkeeping, and reporting requirements."

(b) *Standards for machining.* If you own or operate a new or existing machining affected source, you must implement management practices to minimize emissions of MFHAP as specified in paragraph (b)(1) and (2) of this section for each machining operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when machining operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable; and

(2) You must operate all equipment associated with machining according to manufacturer's instructions.

(c) *Standards for dry grinding and dry polishing with machines.* If you own or operate a new or existing dry grinding and dry polishing with machines affected source, you must comply with the requirements of paragraphs (c)(1) and (2) of this section for each dry grinding and dry polishing with machines operation that uses materials that contain MFHAP, as defined in §63.11522, "What definitions apply to this subpart?", or has the potential to emit MFHAP. These requirements do not apply when dry grinding and dry polishing operations are being performed that do not use any materials containing MFHAP and do not have the potential to emit MFHAP.

(1) You must capture emissions and vent them to a filtration control device. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the filtration control devices, as specified by the requirements in §63.11519(c)(4), "Notification, recordkeeping, and reporting Requirements."

(2) You must implement management practices to minimize emissions of MFHAP as specified in paragraphs (c)(2)(i) and (ii) of this section.

(i) You must take measures necessary to minimize excess dust in the surrounding area to reduce MFHAP emissions, as practicable;

(ii) You must operate all equipment associated with the operation of dry grinding and dry polishing with machines, including the filtration control device, according to manufacturer's instructions.

(d) *Standards for control of MFHAP in spray painting.* If you own or operate a new or existing spray painting affected source, as defined in §63.11514 (b)(4), "Am I subject to this subpart?," you must implement the management practices in paragraphs (d)(1) through (9) of this section when a spray-applied paint that contains MFHAP is being applied. These requirements do not apply when spray-applied paints that do not contain MFHAP are being applied.

(1) *Standards for spray painting for MFHAP control.* All spray-applied painting of objects must meet the requirements of paragraphs (d)(1)(i) through (iii) of this section. These requirements do not apply to affected sources located at Fabricated Structural Metal Manufacturing facilities, as described in Table 1, "Description of Source Categories Affected by this Subpart," or affected sources that spray paint objects greater than 15 feet (4.57 meters), that are not spray painted in spray booths or spray rooms.

(i) Spray booths or spray rooms must have a full roof, at least two complete walls, and one or two complete side curtains or other barrier material so that all four sides are covered. The spray booths or spray rooms must be ventilated so that air is drawn into the booth and leaves only through the filter. The roof may contain narrow slots for connecting fabricated products to overhead cranes, and/or for cords or cables.

(ii) All spray booths or spray rooms must be fitted with a type of filter technology that is demonstrated to achieve at least 98 percent capture of MFHAP. The procedure used to demonstrate filter efficiency must be consistent with the American Society of Heating, Refrigerating, and Air-Conditioning Engineers (ASHRAE) Method 52.1, "Gravimetric and Dust-Spot Procedures for Testing Air-Cleaning Devices Used in General Ventilation for Removing Particulate Matter, June 4, 1992" (incorporated by reference, see §63.14). The test coating for measuring filter efficiency shall be a high-solids bake enamel delivered at a rate of at least 135 grams per minute from a conventional (non-High Volume Low Pressure) air-atomized spray gun operating at 40 psi air pressure; the air flow rate across the filter shall be 150 feet per minute. Owners and operators may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement and are not required to perform this measurement.

(iii) You must perform regular inspection and replacement of the filters in all spray booths or spray rooms according to manufacturer's instructions, and maintain documentation of these activities, as detailed in §63.11519(c)(5), "Notification, recordkeeping, and reporting requirements."

(iv) As an alternative compliance requirement, spray booths or spray rooms equipped with a water curtain, called "waterwash" or "waterspray" booths or spray rooms that are operated and maintained according to the manufacturer's specifications and that achieve at least 98 percent control of MFHAP, may be used in lieu of the spray booths or spray rooms requirements of paragraphs (d)(1)(i) through (iii) of this section.

(2) *Standards for spray painting application equipment of all objects painted for MFHAP control.* All paints applied via spray-applied painting must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated to achieve transfer efficiency comparable to one of these spray gun technologies for a comparable operation, and for which written approval has been obtained from the Administrator. The procedure used to demonstrate that spray gun transfer efficiency is equivalent to that of an HVLP spray gun must be equivalent to the California South Coast Air Quality Management District's "Spray Equipment Transfer Efficiency Test Procedure for Equipment User, May 24, 1989" and "Guidelines for Demonstrating Equivalency with District Approved Transfer Efficient Spray Guns, September 26, 2002", Revision 0 (incorporated by reference, see §63.14).

(3) *Spray system recordkeeping.* You must maintain documentation of the HVLP or other high transfer efficiency spray paint delivery methods, as detailed in §63.11519(c)(7), "Notification, recordkeeping, and reporting requirements."

(4) *Spray gun cleaning.* All cleaning of paint spray guns must be done with either non-HAP gun cleaning solvents, or in such a manner that an atomized mist of spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent. Spray gun cleaning may be done with, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of these non-atomizing methods may also be used.

(5) *Spray painting worker certification.* All workers performing painting must be certified that they have completed training in the proper spray application of paints and the proper setup and maintenance of spray equipment. The minimum requirements for training and certification are described in paragraph (d)(6) of this section. The spray application of paint is prohibited by persons who are not certified as having completed the training described in paragraph (d)(6) of this section. The requirements of this paragraph do not apply to the students of an accredited painting training program who are under the direct supervision of an instructor who meets the requirements of this paragraph. The requirements of this paragraph do not apply to operators of robotic or automated painting operations.

(6) *Spray painting training program content.* Each owner or operator of an affected spray painting affected source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply paints are trained in the proper application of paints as required by paragraph (d)(5) of this section. The training program must include, at a minimum, the items listed in paragraphs (d)(6)(i) through (iii) of this section.

(i) A list of all current personnel by name and job description who are required to be trained;

(ii) Hands-on, or in-house or external classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed in paragraphs (d)(6)(ii)(A) through (D) of this section.

(A) Spray gun equipment selection, set up, and operation, including measuring paint viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate.

(B) Spray technique for different types of paints to improve transfer efficiency and minimize paint usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke.

(C) Routine spray booth and filter maintenance, including filter selection and installation.

(D) Environmental compliance with the requirements of this subpart.

(iii) A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. Alternatively, owners and operators who can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required in paragraph (d)(6)(ii) of this section are not required to provide the initial training required by that paragraph to these painters.

(7) *Records of spray painting training.* You must maintain records of employee training certification for use of HVLP or other high transfer efficiency spray paint delivery methods as detailed in §63.11519(c)(8), "Notification, recordkeeping, and reporting requirements."

(8) *Spray painting training dates.* As required by paragraph (d)(5) of this section, all new and existing personnel at an affected spray painting affected source, including contract personnel, who spray apply paints must be trained by the dates specified in paragraphs (d)(8)(i) and (ii) of this section.

(i) If your source is a new source, all personnel must be trained and certified no later than January 20, 2009, 180 days after startup, or 180 days after hiring, whichever is later. Training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(ii) If your source is an existing source, all personnel must be trained and certified no later than July 25, 2011, or 180 days after hiring, whichever is later. Worker training that was completed within 5 years prior to the date training is required, and that meets the requirements specified in paragraph (d)(6)(ii) of this section, satisfies this requirement and is valid for a period not to exceed 5 years after the date the training is completed.

(9) *Duration of training validity.* Training and certification will be valid for a period not to exceed 5 years after the date the training is completed. All personnel must receive refresher training that meets the requirements of this section and be re-certified every 5 years.

(e) [Reserved]

(f) *Standards for welding.* If you own or operate a new or existing welding affected source, you must comply with the requirements in paragraphs (f)(1) and (2) of this section for each welding operation that uses materials that contain MFHAP, as defined in §63.11522, “What definitions apply to this subpart?”, or has the potential to emit MFHAP. If your welding affected source uses 2,000 pounds or more per year of welding rod containing one or more MFHAP (calculated on a rolling 12-month basis), you must demonstrate that management practices or fume control measures are being implemented by complying with the requirements in paragraphs (f)(3) through (8) of this section. The requirements in paragraphs (f)(1) through (8) of this section do not apply when welding operations are being performed that do not use any materials containing MFHAP or do not have the potential to emit MFHAP.

(1) You must operate all equipment, capture, and control devices associated with welding operations according to manufacturer's instructions. You must demonstrate compliance with this requirement by maintaining a record of the manufacturer's specifications for the capture and control devices, as specified by the requirements in §63.11519(c)(4), “Notification, recordkeeping, and reporting requirements.”

(2) You must implement one or more of the management practices specified in paragraphs (f)(2)(i) through (v) of this section to minimize emissions of MFHAP, as practicable, while maintaining the required welding quality through the application of sound engineering judgment.

(i) Use welding processes with reduced fume generation capabilities (e.g., gas metal arc welding (GMAW)—also called metal inert gas welding (MIG));

(ii) Use welding process variations (e.g., pulsed current GMAW), which can reduce fume generation rates;

(iii) Use welding filler metals, shielding gases, carrier gases, or other process materials which are capable of reduced welding fume generation;

(iv) Optimize welding process variables (e.g., electrode diameter, voltage, amperage, welding angle, shield gas flow rate, travel speed) to reduce the amount of welding fume generated; and

(v) Use a welding fume capture and control system, operated according to the manufacturer's specifications.

(3) *Tier 1 compliance requirements for welding.* You must perform visual determinations of welding fugitive emissions as specified in §63.11517(b), “Monitoring requirements,” at the primary vent, stack, exit, or opening from the building containing the welding operations. You must keep a record of all visual determinations of fugitive emissions along with any corrective action taken in accordance with the requirements in §63.11519(c)(2), “Notification, recordkeeping, and reporting requirements.”

(4) *Requirements upon initial detection of visible emissions from welding.* If visible fugitive emissions are detected during any visual determination required in paragraph (f)(3) of this section, you must comply with the requirements in paragraphs (f)(4)(i) and (ii) of this section.

(i) Perform corrective actions that include, but are not limited to, inspection of welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section. After completing such corrective actions, you must perform a follow-up inspection for visible fugitive emissions in accordance with §63.11517(a), “Monitoring Requirements,” at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) Report all instances where visible emissions are detected, along with any corrective action taken and the results of subsequent follow-up inspections for visible emissions, and submit with your annual certification and compliance report as required by §63.11519(b)(5), “Notification, recordkeeping, and reporting requirements.”

(5) *Tier 2 requirements upon subsequent detection of visible emissions.* If visible fugitive emissions are detected more than once during any consecutive 12 month period (notwithstanding the results of any follow-up inspections), you must comply with paragraphs (f)(5)(i) through (iv) of this section.

(i) Within 24 hours of the end of the visual determination of fugitive emissions in which visible fugitive emissions were detected, you must conduct a visual determination of emissions opacity, as specified in §63.11517(c), "Monitoring requirements," at the primary vent, stack, exit, or opening from the building containing the welding operations.

(ii) In lieu of the requirement of paragraph (f)(3) of this section to perform visual determinations of fugitive emissions with EPA Method 22, you must perform visual determinations of emissions opacity in accordance with §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iii) You must keep a record of each visual determination of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, in accordance with the requirements in §63.11519(c)(3), "Notification, recordkeeping, and reporting requirements."

(iv) You must report the results of all visual determinations of emissions opacity performed in accordance with paragraphs (f)(5)(i) or (ii) of this section, along with any subsequent corrective action taken, and submit with your annual certification and compliance report as required by §63.11519(b)(6), "Notification, recordkeeping, and reporting requirements."

(6) *Requirements for opacities less than or equal to 20 percent but greater than zero.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded is 20 percent or less but greater than zero, you must perform corrective actions, including inspection of all welding fume sources, and evaluation of the proper operation and effectiveness of the management practices or fume control measures implemented in accordance with paragraph (f)(2) of this section.

(7) *Tier 3 requirements for opacities exceeding 20 percent.* For each visual determination of emissions opacity performed in accordance with paragraph (f)(5) of this section for which the average of the six-minute average opacities recorded exceeds 20 percent, you must comply with the requirements in paragraphs (f)(7)(i) through (v) of this section.

(i) You must submit a report of exceedence of 20 percent opacity, along with your annual certification and compliance report, as specified in §63.11519(b)(8), "Notification, recordkeeping, and reporting requirements," and according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(ii) Within 30 days of the opacity exceedence, you must prepare and implement a Site-Specific Welding Emissions Management Plan, as specified in paragraph (f)(8) of this section. If you have already prepared a Site-Specific Welding Emissions Management Plan in accordance with this paragraph, you must prepare and implement a revised Site-Specific Welding Emissions Management Plan within 30 days.

(iii) During the preparation (or revision) of the Site-Specific Welding Emissions Management Plan, you must continue to perform visual determinations of emissions opacity, beginning on a daily schedule as specified in §63.11517(d), "Monitoring Requirements," using EPA Method 9, at the primary vent, stack, exit, or opening from the building containing the welding operations.

(iv) You must maintain records of daily visual determinations of emissions opacity performed in accordance with paragraph (f)(7)(iii) of this section, during preparation of the Site-Specific Welding Emissions Management Plan, in accordance with the requirements in §63.11519(b)(9), "Notification, recordkeeping, and reporting requirements."

(v) You must include these records in your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(8) *Site-Specific Welding Emissions Management Plan.* The Site-Specific Welding Emissions Management Plan must comply with the requirements in paragraphs (f)(8)(i) through (iii) of this section.

(i) Site-Specific Welding Emissions Management Plan must contain the information in paragraphs (f)(8)(i)(A) through (F) of this section.

(A) Company name and address;

(B) A list and description of all welding operations which currently comprise the welding affected source;

(C) A description of all management practices and/or fume control methods in place at the time of the opacity exceedance;

(D) A list and description of all management practices and/or fume control methods currently employed for the welding affected source;

(E) A description of additional management practices and/or fume control methods to be implemented pursuant to paragraph (f)(7)(ii) of this section, and the projected date of implementation; and

(F) Any revisions to a Site-Specific Welding Emissions Management Plan must contain copies of all previous plan entries, pursuant to paragraphs (f)(8)(i)(D) and (E) of this section.

(ii) The Site-Specific Welding Emissions Management Plan must be updated annually to contain current information, as required by paragraphs (f)(8)(i)(A) through (C) of this section, and submitted with your annual certification and compliance report, according to the requirements of §63.11519(b)(1), "Notification, recordkeeping, and reporting requirements."

(iii) You must maintain a copy of the current Site-Specific Welding Emissions Management Plan in your records in a readily-accessible location for inspector review, in accordance with the requirements in §63.11519(c)(12), "Notification, recordkeeping, and reporting requirements."

§ 63.11517 What are my monitoring requirements?

(a) *Visual determination of fugitive emissions, general.* Visual determination of fugitive emissions must be performed according to the procedures of EPA Method 22, of 40 CFR part 60, Appendix A-7. You must conduct the EPA Method 22 test while the affected source is operating under normal conditions. The duration of each EPA Method 22 test must be at least 15 minutes, and visible emissions will be considered to be present if they are detected for more than six minutes of the fifteen minute period.

(b) *Visual determination of fugitive emissions, graduated schedule.* Visual determinations of fugitive emissions must be performed in accordance with paragraph (a) of this section and according to the schedule in paragraphs (b)(1) through (4) of this section.

(1) *Daily Method 22 Testing.* Perform visual determination of fugitive emissions once per day, on each day the process is in operation, during operation of the process.

(2) *Weekly Method 22 Testing.* If no visible fugitive emissions are detected in consecutive daily EPA Method 22 tests, performed in accordance with paragraph (b)(1) of this section for 10 days of work day operation of the process, you may decrease the frequency of EPA Method 22 testing to once every five days of operation of the process (one calendar week). If visible fugitive emissions are detected during these tests, you must resume EPA Method 22 testing of that operation once per day during each day that the process is in operation, in accordance with paragraph (b)(1) of this section.

(3) *Monthly Method 22 Testing.* If no visible fugitive emissions are detected in four consecutive weekly EPA Method 22 tests performed in accordance with paragraph (b)(2) of this section, you may decrease the frequency of EPA Method 22 testing to once per 21 days of operation of the process (one calendar month). If visible fugitive emissions are detected during these tests, you must resume weekly EPA Method 22 in accordance with paragraph (b)(2) of this section.

(4) *Quarterly Method 22 Testing.* If no visible fugitive emissions are detected in three consecutive monthly EPA Method 22 tests performed in accordance with paragraph (b)(3) of this section, you may decrease the frequency of EPA Method 22 testing to once per 60 days of operation of the process (3 calendar months). If visible fugitive emissions are detected during these tests, you must resume monthly EPA Method 22 in accordance with paragraph (b)(3) of this section.

(c) *Visual determination of emissions opacity for welding Tier 2 or 3, general.* Visual determination of emissions opacity must be performed in accordance with the procedures of EPA Method 9, of 40 CFR part 60, Appendix A-4, and while the affected source is operating under normal conditions. The duration of the EPA Method 9 test shall be thirty minutes.

(d) *Visual determination of emissions opacity for welding Tier 2 or 3, graduated schedule.* You must perform visual determination of emissions opacity in accordance with paragraph (c) of this section and according to the schedule in paragraphs (d)(1) through (5) of this section.

(1) *Daily Method 9 testing for welding, Tier 2 or 3.* Perform visual determination of emissions opacity once per day during each day that the process is in operation.

(2) *Weekly Method 9 testing for welding, Tier 2 or 3.* If the average of the six minute opacities recorded during any of the daily consecutive EPA Method 9 tests performed in accordance with paragraph (d)(1) of this section does not exceed 20 percent for 10 days of operation of the process, you may decrease the frequency of EPA Method 9 testing to once per five days of consecutive work day operation. If opacity greater than 20 percent is detected during any of these tests, you must resume testing every day of operation of the process according to the requirements of paragraph (d)(1) of this section.

(3) *Monthly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(2) of this section does not exceed 20 percent for four consecutive weekly tests, you may decrease the frequency of EPA Method 9 testing to once per every 21 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any monthly test, you must resume testing every five days of operation of the process according to the requirements of paragraph (d)(2) of this section.

(4) *Quarterly Method 9 testing for welding Tier 2 or 3.* If the average of the six minute opacities recorded during any of the consecutive weekly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent for three consecutive monthly tests, you may decrease the frequency of EPA Method 9 testing to once per every 120 days of operation of the process. If visible emissions opacity greater than 20 percent is detected during any quarterly test, you must resume testing every 21 days (month) of operation of the process according to the requirements of paragraph (d)(3) of this section.

(5) *Return to Method 22 testing for welding, Tier 2 or 3.* If, after two consecutive months of testing, the average of the six minute opacities recorded during any of the monthly EPA Method 9 tests performed in accordance with paragraph (d)(3) of this section does not exceed 20 percent, you may resume EPA Method 22 testing as in paragraphs (b)(3) and (4) of this section. In lieu of this, you may elect to continue performing EPA Method 9 tests in accordance with paragraphs (d)(3) and (4) of this section.

§ 63.11518 [Reserved]

§ 63.11519 What are my notification, recordkeeping, and reporting requirements?

(a) *What notifications must I submit? —(1) Initial notification.* If you are the owner or operator of an area source in one of the nine metal fabrication and finishing source categories, as defined in §63.11514 “Am I subject to this subpart?,” you must submit the Initial Notification required by §63.9(b) “General Provisions,” for a new affected source no later than 120 days after initial startup or November 20, 2008, whichever is later. For an existing affected source, you must submit the Initial Notification no later than July 25, 2011. Your Initial Notification must provide the information specified in paragraphs (a)(1)(i) through (iv) of this section.

(i) The name, address, phone number and e-mail address of the owner and operator;

(ii) The address (physical location) of the affected source;

(iii) An identification of the relevant standard (i.e., this subpart); and

(iv) A brief description of the type of operation. For example, a brief characterization of the types of products (e.g., aerospace components, sports equipment, etc.), the number and type of processes, and the number of workers usually employed.

(2) *Notification of compliance status.* If you are the owner or operator of an existing affected source, you must submit a notification of compliance status on or before November 22, 2011. If you are the owner or operator of a new affected source, you must submit a notification of compliance status within 120 days after initial startup, or by November 20, 2008, whichever is later. You are required to submit the information specified in paragraphs (a)(2)(i) through (iv) of this section with your notification of compliance status:

(i) Your company's name and address;

(ii) A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart;

(iii) If you operate any spray painting affected sources, the information required by §63.11516(e)(3)(vi)(C), "Compliance demonstration," or §63.11516(e)(4)(ix)(C), "Compliance demonstration," as applicable; and

(iv) The date of the notification of compliance status.

(b) *What reports must I prepare or submit? –(1) Annual certification and compliance reports.* You must prepare and submit annual certification and compliance reports for each affected source according to the requirements of paragraphs (b)(2) through (7) of this section. The annual certification and compliance reporting requirements may be satisfied by reports required under other parts of the CAA, as specified in paragraph (b)(3) of this section.

(2) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), "General Provisions," you must prepare and submit each annual certification and compliance report according to the dates specified in paragraphs (b)(2)(i) through (iii) of this section. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(i) The first annual certification and compliance report must cover the first annual reporting period which begins the day after the compliance date and ends on December 31.

(ii) Each subsequent annual certification and compliance report must cover the subsequent semiannual reporting period from January 1 through December 31.

(iii) Each annual certification and compliance report must be prepared and submitted no later than January 31 and kept in a readily-accessible location for inspector review. If an exceedance has occurred during the year, each annual certification and compliance report must be submitted along with the exceedance reports, and postmarked or delivered no later than January 31.

(3) *Alternate dates.* For each affected source that is subject to permitting regulations pursuant to 40 CFR part 70 or 40 CFR part 71, "Title V."

(i) If the permitting authority has established dates for submitting annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," you may prepare or submit, if required, the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (b)(2)(iii) of this section.

(ii) If an affected source prepares or submits an annual certification and compliance report pursuant to this section along with, or as part of, the monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), "Title V," and the compliance report includes all required information concerning exceedences of any limitation in this subpart, its submission will be deemed to satisfy any obligation to report the same exceedences in the annual monitoring report. However, submission of an annual certification and compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.

(4) *General requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(4)(i) through (iii) of this section, and the information specified in paragraphs (b)(5) through (7) of this section that is applicable to each affected source.

(i) Company name and address;

(ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report; and

(iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period ending on December 31. Note that the information reported for the 12 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation.

(5) *Visual determination of fugitive emissions requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(5)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

- (i) The date of every visual determination of fugitive emissions which resulted in detection of visible emissions;
- (ii) A description of the corrective actions taken subsequent to the test; and
- (iii) The date and results of the follow-up visual determination of fugitive emissions performed after the corrective actions.

(6) *Visual determination of emissions opacity requirements.* The annual certification and compliance report must contain the information specified in paragraphs (b)(6)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

- (i) The date of every visual determination of emissions opacity;
- (ii) The average of the six-minute opacities measured by the test; and
- (iii) A description of any corrective action taken subsequent to the test.

(7) [Reserved]

(8) *Exceedences of 20 percent opacity for welding affected sources.* As required by §63.11516(f)(7)(i), "Requirements for opacities exceeding 20 percent," you must prepare an exceedence report whenever the average of the six-minute average opacities recorded during a visual determination of emissions opacity exceeds 20 percent. This report must be submitted along with your annual certification and compliance report according to the requirements in paragraph (b)(1) of this section, and must contain the information in paragraphs (b)(8)(iii)(A) and (B) of this section.

- (A) The date on which the exceedence occurred; and
- (B) The average of the six-minute average opacities recorded during the visual determination of emissions opacity.

(9) *Site-specific Welding Emissions Management Plan reporting.* You must submit a copy of the records of daily visual determinations of emissions recorded in accordance with §63.11516(f)(7)(iv), "Tier 3 requirements for opacities exceeding 20 percent," and a copy of your Site-Specific Welding Emissions Management Plan and any subsequent revisions to the plan pursuant to §63.11516(f)(8), "Site-specific Welding Emission Management Plan," along with your annual certification and compliance report, according to the requirements in paragraph (b)(1) of this section.

(c) *What records must I keep?* You must collect and keep records of the data and information specified in paragraphs (c)(1) through (13) of this section, according to the requirements in paragraph (c)(14) of this section.

(1) *General compliance and applicability records.* Maintain information specified in paragraphs (c)(1)(i) through (ii) of this section for each affected source.

- (i) Each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
- (ii) Records of the applicability determinations as in §63.11514(b)(1) through (5), "Am I subject to this subpart," listing equipment included in its affected source, as well as any changes to that and on what date they occurred, must be maintained for 5 years and be made available for inspector review at any time.

(2) *Visual determination of fugitive emissions records.* Maintain a record of the information specified in paragraphs (c)(2)(i) through (iii) of this section for each affected source which performs visual determination of fugitive emissions in accordance with §63.11517(a), "Monitoring requirements."

- (i) The date and results of every visual determination of fugitive emissions;

(ii) A description of any corrective action taken subsequent to the test; and

(iii) The date and results of any follow-up visual determination of fugitive emissions performed after the corrective actions.

(3) *Visual determination of emissions opacity records.* Maintain a record of the information specified in paragraphs (c)(3)(i) through (iii) of this section for each affected source which performs visual determination of emissions opacity in accordance with §63.11517(c), "Monitoring requirements."

(i) The date of every visual determination of emissions opacity; and

(ii) The average of the six-minute opacities measured by the test; and

(iii) A description of any corrective action taken subsequent to the test.

(4) Maintain a record of the manufacturer's specifications for the control devices used to comply with §63.11516, "What are my standards and management practices?"

(5) *Spray paint booth filter records.* Maintain a record of the filter efficiency demonstrations and spray paint booth filter maintenance activities, performed in accordance with §63.11516(d)(1)(ii) and (iii), "Requirements for spray painting objects in spray booths or spray rooms."

(6) Waterspray booth or water curtain efficiency tests. Maintain a record of the water curtain efficiency demonstrations performed in accordance with §63.11516(d)(1)(ii), "Requirements for spray painting objects in spray booths or spray rooms."

(7) *HVLP or other high transfer efficiency spray delivery system documentation records.* Maintain documentation of HVLP or other high transfer efficiency spray paint delivery systems, in compliance with §63.11516(d)(3), "Requirements for spray painting of all objects." This documentation must include the manufacturer's specifications for the equipment and any manufacturer's operation instructions. If you have obtained written approval for an alternative spray application system in accordance with §63.11516(d)(2), "Spray painting of all objects," you must maintain a record of that approval along with documentation of the demonstration of equivalency.

(8) *HVLP or other high transfer efficiency spray delivery system employee training documentation records.* Maintain certification that each worker performing spray painting operations has completed the training specified in §63.11516(d)(6), "Requirements for spray painting of all objects," with the date the initial training and the most recent refresher training was completed.

(9)–(10) [Reserved]

(11) *Visual determination of emissions opacity performed during the preparation (or revision) of the Site-Specific Welding Emissions Management Plan.* You must maintain a record of each visual determination of emissions opacity performed during the preparation (or revision) of a Site-Specific Welding Emissions Management Plan, in accordance with §63.11516(f)(7)(iii), "Requirements for opacities exceeding 20 percent."

(12) *Site-Specific Welding Emissions Management Plan.* If you have been required to prepare a plan in accordance with §63.11516(f)(7)(iii), "Site-Specific Welding Emissions Management Plan," you must maintain a copy of your current Site-Specific Welding Emissions Management Plan in your records and it must be readily available for inspector review.

(13) *Manufacturer's instructions.* If you comply with this subpart by operating any equipment according to manufacturer's instruction, you must keep these instructions readily available for inspector review.

(14) *Welding Rod usage.* If you operate a new or existing welding affected source which is not required to comply with the requirements of §63.11516(f)(3) through (8) because it uses less than 2,000 pounds per year of welding rod (on a rolling 12-month basis), you must maintain records demonstrating your welding rod usage on a rolling 12-month basis.

(15) Your records must be maintained according to the requirements in paragraphs (c)(14)(i) through (iii) of this section.

(i) Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1), "General Provisions." Where appropriate, the records may be maintained as electronic spreadsheets or as a database.

(ii) As specified in §63.10(b)(1), “General Provisions,” you must keep each record for 5 years following the date of each occurrence, measurement, corrective action, report, or record.

(iii) You must keep each record on-site for at least 2 years after the date of each occurrence, measurement, corrective action, report, or record according to §63.10(b)(1), “General Provisions.” You may keep the records off-site for the remaining 3 years.

§ 63.11520 [Reserved]

Other Requirements and Information

§ 63.11521 Who implements and enforces this subpart?

(a) This subpart can be implemented and enforced by EPA or a delegated authority such as your state, local, or tribal agency. If the EPA Administrator has delegated authority to your state, local, or tribal agency, then that agency, in addition to EPA, has the authority to implement and enforce this subpart. You should contact your EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to your state, local, or tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a state, local, or tribal agency under 40 CFR part 63, subpart E, the authorities contained in paragraph (c) of this section are retained by the EPA Administrator and are not transferred to the state, local, or tribal agency.

(c) The authorities that cannot be delegated to state, local, or tribal agencies are specified in paragraphs (c)(1) through (5) of this section.

(1) Approval of an alternative non-opacity emissions standard under §63.6(g), of the General Provisions of this part.

(2) Approval of an alternative opacity emissions standard under §63.6(h)(9), of the General Provisions of this part.

(3) Approval of a major change to test methods under §63.7(e)(2)(ii) and (f), of the General Provisions of this part. A “major change to test method” is defined in §63.90.

(4) Approval of a major change to monitoring under §63.8(f), of the General Provisions of this part. A “major change to monitoring” under is defined in §63.90.

(5) Approval of a major change to recordkeeping and reporting under §63.10(f), of the General Provisions of this part. A “major change to recordkeeping/reporting” is defined in §63.90.

§ 63.11522 What definitions apply to this subpart?

The terms used in this subpart are defined in the CAA; and in this section as follows:

Adequate emission capture methods are hoods, enclosures, or any other duct intake devices with ductwork, dampers, manifolds, plenums, or fans designed to draw greater than 85 percent of the airborne dust generated from the process into the control device.

Capture system means the collection of components used to capture gases and fumes released from one or more emissions points and then convey the captured gas stream to a control device or to the atmosphere. A capture system may include, but is not limited to, the following components as applicable to a given capture system design: duct intake devices, hoods, enclosures, ductwork, dampers, manifolds, plenums, and fans.

Cartridge collector means a type of control device that uses perforated metal cartridges containing a pleated paper or non-woven fibrous filter media to remove PM from a gas stream by sieving and other mechanisms. Cartridge collectors can be designed with single use cartridges, which are removed and disposed after reaching capacity, or continuous use cartridges, which typically are cleaned by means of a pulse-jet mechanism.

Confined abrasive blasting enclosure means an enclosure that includes a roof and at least two complete walls, with side curtains and ventilation as needed to insure that no air or PM exits the enclosure while dry abrasive blasting is performed. Apertures or slots may

be present in the roof or walls to allow for mechanized transport of the blasted objects with overhead cranes, or cable and cord entry into the dry abrasive blasting chamber.

Control device means equipment installed on a process vent or exhaust system that reduces the quantity of a pollutant that is emitted to the air.

Dry abrasive blasting means cleaning, polishing, conditioning, removing or preparing a surface by propelling a stream of abrasive material with compressed air against the surface. Hydroblasting, wet abrasive blasting, or other abrasive blasting operations which employ liquids to reduce emissions are not dry abrasive blasting.

Dry grinding and dry polishing with machines means grinding or polishing without the use of lubricating oils or fluids in fixed or stationary machines. Hand grinding, hand polishing, and bench top dry grinding and dry polishing are not included under this definition.

Fabric filter means a type of control device used for collecting PM by filtering a process exhaust stream through a filter or filter media; a fabric filter is also known as a baghouse.

Facility maintenance means operations performed as part of the routine repair or renovation of process equipment, machinery, control equipment, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity. Facility maintenance also includes operations associated with the installation of new equipment or structures, and any processes as part of janitorial activities. Facility maintenance includes operations on stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Facility maintenance also includes operations performed on mobile equipment, such as fork trucks, that are used in a manufacturing facility and which are maintained in that same facility. Facility maintenance does not include spray-applied coating of motor vehicles, mobile equipment, or items that routinely leave and return to the facility, such as delivery trucks, rental equipment, or containers used to transport, deliver, distribute, or dispense commercial products to customers, such as compressed gas canisters.

Filtration control device means a control device that utilizes a filter to reduce the emissions of MFHAP and other PM.

Grinding means a process performed on a workpiece to remove undesirable material from the surface or to remove burrs or sharp edges. Grinding is done using belts, disks, or wheels consisting of or covered with various abrasives.

Machining means dry metal turning, milling, drilling, boring, tapping, planing, broaching, sawing, cutting, shaving, shearing, threading, reaming, shaping, slotting, hobbing, and chamfering with machines. Shearing operations cut materials into a desired shape and size, while forming operations bend or conform materials into specific shapes. Cutting and shearing operations include punching, piercing, blanking, cutoff, parting, shearing and trimming. Forming operations include bending, forming, extruding, drawing, rolling, spinning, coining, and forging the metal. Processes specifically excluded are hand-held devices and any process employing fluids for lubrication or cooling.

Material containing MFHAP means a material containing one or more MFHAP. Any material that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material, is considered to be a material containing MFHAP.

Metal fabrication and finishing HAP (MFHAP) means any compound of the following metals: Cadmium, chromium, lead, manganese, or nickel, or any of these metals in the elemental form, with the exception of lead.

Metal fabrication and finishing source categories are limited to the nine metal fabrication and finishing source categories with the activities described in Table 1, "Description of Source Categories Affected by this Subpart." Metal fabrication or finishing operations means dry abrasive blasting, machining, spray painting, or welding in any one of the nine metal fabrication and finishing area source categories listed in Table 1, "Description of Source Categories Affected by this Subpart."

Military munitions means all ammunition products and components produced or used by or for the U.S. Department of Defense (DoD) or for the U.S. Armed Services for national defense and security, including military munitions under the control of the DoD, the U.S. Coast Guard, the National Nuclear Security Administration (NNSA), U.S. Department of Energy (DOE), and National Guard personnel. The term military munitions includes: Confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DoD components, including bulk explosives and chemical warfare agents, chemical

munitions, biological weapons, rockets, guided and ballistic missiles, bombs, warheads, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, nonnuclear components of nuclear weapons, wholly inert ammunition products, and all devices and components of any items listed in this definition.

Paint means a material applied to a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, coatings, sealants, liquid plastic coatings, caulks, inks, adhesives, and maskants. Decorative, protective, or functional materials that consist only of protective oils for metal, acids, bases, or any combination of these substances, or paper film or plastic film which may be pre-coated with an adhesive by the film manufacturer, are not considered paints for the purposes of this subpart.

Polishing with machines means an operation which removes fine excess metal from a surface to prepare the surface for more refined finishing procedures prior to plating or other processes. Polishing may also be employed to remove burrs on castings or stampings. Polishing is performed using hard-faced wheels constructed of muslin, canvas, felt or leather, and typically employs natural or artificial abrasives. Polishing performed by hand without machines or in bench top operations are not considered polishing with machines for the purposes of this subpart.

Primarily engaged means the manufacturing, fabricating, or forging of one or more products listed in one of the nine metal fabrication and finishing source category descriptions in Table 1, "Description of Source Categories Affected by this Subpart," where this production represents at least 50 percent of the production at a facility, and where production quantities are established by the volume, linear foot, square foot, or other value suited to the specific industry. The period used to determine production should be the previous continuous 12 months of operation. Facilities must document and retain their rationale for the determination that their facility is not "primarily engaged" pursuant to §63.10(b)(3) of the General Provisions.

Quality control activities means operations that meet all of the following criteria:

- (1) The activities are intended to detect and correct defects in the final product by selecting a limited number of samples from the operation, and comparing the samples against specific performance criteria.
- (2) The activities do not include the production of an intermediate or final product for sale or exchange for commercial profit; for example, parts that are not sold and do not leave the facility.
- (3) The activities are not a normal part of the operation;
- (4) The activities do not involve fabrication of tools, equipment, machinery, and structures that comprise the infrastructure of the facility and that are necessary for the facility to function in its intended capacity; that is, the activities are not facility maintenance.

Responsible official means responsible official as defined in 40 CFR 70.2.

Spray-applied painting means application of paints using a hand-held device that creates an atomized mist of paint and deposits the paint on a substrate. For the purposes of this subpart, spray-applied painting does not include the following materials or activities:

- (1) Paints applied from a hand-held device with a paint cup capacity that is less than 3.0 fluid ounces (89 cubic centimeters).
- (2) Surface coating application using powder coating, hand-held, non-refillable aerosol containers, or non-atomizing application technology, including, but not limited to, paint brushes, rollers, hand wiping, flow coating, dip coating, electrodeposition coating, web coating, coil coating, touch-up markers, or marking pens.
- (3) Painting operations that normally require the use of an airbrush or an extension on the spray gun to properly reach limited access spaces; the application of paints that contain fillers that adversely affect atomization with HVLP spray guns, and the application of paints that normally have a dried film thickness of less than 0.0013 centimeter (0.0005 in.).
- (4) Thermal spray operations (also known as metallizing, flame spray, plasma arc spray, and electric arc spray, among other names) in which solid metallic or non-metallic material is heated to a molten or semi-molten state and propelled to the work piece or substrate by compressed air or other gas, where a bond is produced upon impact.

Spray booth or spray room means an enclosure with four sides and a roof where spray paint is prevented from leaving the booth during spraying by the enclosure. The roof of the spray booth or spray room may contain narrow slots for connecting the parts and products to overhead cranes, or for cord or cable entry into the spray booth or spray room.

Tool or equipment repair means equipment and devices used to repair or maintain process equipment or to prepare molds, dies, or other changeable elements of process equipment.

Totally enclosed and unvented means enclosed so that no air enters or leaves during operation.

Totally enclosed and unvented dry abrasive blasting chamber means a dry abrasive blasting enclosure which has no vents to the atmosphere, thus no emissions. A typical example of this sort of abrasive blasting enclosure is a small "glove box" enclosure, where the worker places their hands in openings or gloves that extend into the box and enable the worker to hold the objects as they are being blasted without allowing air and blast material to escape the box.

Vented dry abrasive blasting means dry abrasive blasting where the blast material is moved by air flow from within the chamber to outside the chamber into the atmosphere or into a control device.

Welding means a process which joins two metal parts by melting the parts at the joint and filling the space with molten metal.

Welding rod containing MFHAP means a welding rod that contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal), or that contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the welding rod.

§ 63.11523 What General Provisions apply to this subpart?

The provisions in 40 CFR part 63, subpart A, applicable to sources subject to §63.11514(a) are specified in Table 2 of this subpart.

Table 1 to Subpart XXXXXX of Part 63—Description of Source Categories Affected by This Subpart

Metal fabrication and finishing source category	Description
Electrical and Electronic Equipment Finishing Operations	Establishments primarily engaged in manufacturing motors and generators; and electrical machinery, equipment, and supplies, not elsewhere classified. The electrical machinery equipment and supplies industry sector of this source category includes establishments primarily engaged in high energy particle acceleration systems and equipment, electronic simulators, appliance and extension cords, bells and chimes, insect traps, and other electrical equipment and supplies not elsewhere classified. The motors and generators sector of this source category includes establishments primarily engaged in manufacturing electric motors (except engine starting motors) and power generators; motor generator sets; railway motors and control equipment; and motors, generators and control equipment for gasoline, electric, and oil-electric buses and trucks.
Fabricated Metal Products	Establishments primarily engaged in manufacturing fabricated metal products, such as fire or burglary resistive steel safes and vaults and similar fire or burglary resistive products; and collapsible tubes of thin flexible metal. Also, establishments primarily engaged in manufacturing powder metallurgy products, metal boxes; metal ladders; metal household articles, such as ice cream freezers and ironing boards; and other fabricated metal products not elsewhere classified.
Fabricated Plate Work (Boiler Shops)	Establishments primarily engaged in manufacturing power marine boilers, pressure and nonpressure tanks, processing and storage vessels, heat exchangers, weldments and similar products.
Fabricated Structural Metal Manufacturing	Establishments primarily engaged in fabricating iron and steel or other metal for structural purposes, such as bridges, buildings, and sections for ships, boats, and barges.
Heating Equipment, except Electric	Establishments primarily engaged in manufacturing heating equipment, except electric and warm air furnaces, including gas, oil, and stoker coal fired equipment for the automatic utilization of gaseous, liquid, and solid fuels. Products produced in this source category include low-pressure heating (steam or hot water) boilers, fireplace inserts, domestic (steam or hot water) furnaces, domestic gas burners, gas room heaters, gas infrared heating units, combination gas-oil burners, oil or gas swimming pool heaters, heating apparatus (except electric or warm air), kerosene space heaters, gas fireplace logs, domestic and industrial oil burners, radiators (except electric), galvanized iron nonferrous metal range boilers, room heaters (except electric), coke and gas burning salamanders, liquid or gas solar energy collectors, solar heaters, space heaters (except electric), mechanical (domestic and industrial) stokers, wood and coal-burning stoves, domestic unit heaters (except electric), and wall heaters (except electric).
Industrial Machinery and Equipment Finishing Operations	Establishments primarily engaged in construction machinery manufacturing; oil and gas field machinery manufacturing; and pumps and pumping equipment manufacturing. The construction machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing heavy machinery and equipment of types used primarily by the construction industries, such as bulldozers; concrete mixers; cranes, except industrial plant overhead and truck-type cranes; dredging machinery; pavers; and power shovels. Also establishments primarily engaged in manufacturing forestry equipment and certain specialized equipment, not elsewhere classified, similar to that used by the construction industries, such as elevating platforms, ship cranes, and capstans, aerial work platforms, and automobile wrecker hoists. The oil and gas field machinery manufacturing industry sector of this source category includes establishments primarily engaged in manufacturing machinery and equipment for use in oil and gas fields or for drilling water wells, including portable drilling rigs. The pumps and pumping equipment manufacturing sector of this source category includes establishments primarily engaged in manufacturing pumps and pumping equipment for general industrial, commercial, or household use, except fluid power pumps and motors. This category includes establishments primarily engaged in manufacturing domestic water and sump pumps.

Metal fabrication and finishing source category	Description
Iron and Steel Forging	Establishments primarily engaged in the forging manufacturing process, where purchased iron and steel metal is pressed, pounded or squeezed under great pressure into high strength parts known as forgings. The forging process is different from the casting and foundry processes, as metal used to make forged parts is never melted and poured.
Primary Metals Products Manufacturing	Establishments primarily engaged in manufacturing products such as fabricated wire products (except springs) made from purchased wire. These facilities also manufacture steel balls; nonferrous metal brads and nails; nonferrous metal spikes, staples, and tacks; and other primary metals products not elsewhere classified.
Valves and Pipe Fittings	Establishments primarily engaged in manufacturing metal valves and pipe fittings; flanges; unions, with the exception of purchased pipes; and other valves and pipe fittings not elsewhere classified.

Table 2—to Subpart XXXXXX of Part 63—Applicability of General Provisions to Metal Fabrication or Finishing Area Sources

Instructions for Table 2 —As required in §63.11523, “General Provisions Requirements,” you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.5	Construction/reconstruction.
63.6(a), (b)(1)–(b)(5), (c)(1), (c)(2), (c)(5), (g), (i), (j)	Compliance with standards and maintenance requirements.
63.9(a)–(d)	Notification requirements.
63.10(a), (b) except for (b)(2), (d)(1), (d)(4)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.
63.16	Performance track provisions.

¹§63.11514(g), “Am I subject to this subpart?” exempts affected sources from the obligation to obtain title V operating permits.

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

**Technical Support Document (TSD) for a Part 70 Significant Source and
Permit Modification**

Source Description and Location

Source Name:	Industrial Steel Construction, Inc.
Source Location:	86 North Bridge Street, Gary, Indiana 46404
County:	Lake
SIC Code:	3441 (Fabricated Structural Metal) and 3449 (Miscellaneous Structural Metal Work)
Operation Permit No.:	T 089-29933-00161
Operation Permit Issuance Date:	July 11 th , 2011
Significant Source Modification No.:	089-32748-00161
Significant Permit Modification No.:	089-32762-00161
Permit Reviewer:	Brian Williams

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. 089-29933-00161 on July 11th, 2011. The source has since received the following approval:

- (a) Significant Permit Modification No. 089-30910-00161, issued on January 17th, 2012.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard.
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Unclassifiable or attainment effective February 6, 2012, for PM2.5.

- (a) Ozone Standards
U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012 the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective, August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against US EPA in the US Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially

liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. 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. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) **PM_{2.5}**
 Lake County has been classified as attainment for PM_{2.5}. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011 the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective, June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Lake 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.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	248
PM ₁₀	248
PM _{2.5}	2,163
SO ₂	negligible
VOC	Greater than 100, but <250
CO	8.0
NO _x	10.0
GHGs as CO ₂ e	11,993
HAPs	
Hexane	6.60
Total	21.0

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because VOC, a nonattainment regulated pollutant, is emitted at a rate of 100 tons per year or more.

- (c) These emissions with the exception of greenhouse gases are based upon TSD to Part 70 Operating Permit Renewal No. 089-29933-00161, issued on July 11th, 2011. See Appendix A of this Technical Support Document for greenhouse gas emission calculations.
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Industrial Steel Construction, Inc. on January 17, 2013, relating to the construction and operation of a new mechanical blaster, equipped with a baghouse. The new blaster will be used for cleaning scale from fabricated metal.

The following is a list of the proposed emission unit and pollution control device:

Bay #8 West

- (a) One (1) mechanical blaster #6, identified as EU #23, approved for construction in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot.

In order to incorporate this new emission unit into the permit and remain a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), Industrial Steel Construction has requested to decrease the PM and PM10 emission limits for mechanical blasters #1 and #5. In addition, the source has requested to limit the source-wide PM2.5 emissions to less than 250 tons per year and VOC emissions to less than 100 tons per year. As a result, this source will now be a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset).

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	155.88
PM ₁₀	155.88
PM _{2.5}	155.88
SO ₂	0
VOC	0
CO	0
NO _x	0
GHGs as CO ₂ e	0
Single HAPs	<10>
Total HAPs	<25>

(a) Significant Source Modification

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit PM, PM₁₀, and PM_{2.5} is greater than twenty-five (25) tons per year before control, each.

(b) Significant Permit Modification

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification involves significant changes in permit terms or conditions (such as a case by case determination of emission limitations and significant changes in existing monitoring Part 70 permit terms and conditions).

Permit Level Determination – PSD

The table below summarizes the potential to emit of the entire source (reflecting adjustment of existing limits), with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, 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 to accommodate the Proposed Modification (tons/year)									
	PM	PM ₁₀ *	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Mechanical Blaster EU #1	41.6 7.67	41.6 7.67	587 7.67	0	0	0	0	0	0	0
Mechanical Blaster EU #2	2.58	2.58	128 2.58	0	0	0	0	0	0	0
Blaster #3 EU#18	2.54	2.54	126 2.54	0	0	0	0	0	0	0
Mech. Blaster/Blowoff EU#19	5.48	5.48	273 5.48	0	0	0	0	0	0	0
Mechanical Blaster 5 EU# 21	41.3 8.76	41.3 8.76	631 8.76	0	0	0	0	0	0	0

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Modification (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Mechanical Blaster 6 EU#23	6.57	6.57	6.57	0	0	0	0	0	0	0
Electric Arc Stick Welding EU#9	11.98	11.98	11.98	0	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30.39	30.39	30.39	0	0	0	0	0	0	0
Slab Grinders EU#11	98.60	98.60	302 98.60	0	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44.39	44.39	44.39	0	0	0	0	0	0.24	0.22 Manganese
Submerged Arc Welding EU#17	7.95	7.95	7.95	0	0	0	0	0	2.43	2.43 Manganese
Part Washers EU#12	0	0	0	0	0	2.43	0	0	0	0
Paint Booth EU#15	2.00	2.00	2.00	0	0	19.50	0	0	18.20	6.41 Hexane
Paint Booth EU#20	2.7	2.7	2.7	0	0	30.24	0	0		
Paint Booth EU#22	16.06	16.06	16.06	0	0	< 197	0	0		
Paint Booth EU#15	2.00	2.00	2.00	0	0	96.02	0	0	18.20	6.41 Hexane
Paint Booth EU#20	1.63	1.63	1.63	0	0		0	0		
Paint Booth EU#22	16.06	16.06	16.06	0	0		0	0		
Combustion Units	0.19	0.75	0.75	0.06	9.93	0.55	8.34	11,993	0.19	0.18 Hexane
Total PTE of Entire Source	247.9 246.77	247.9 247.34	2.163 247.34	0.06	9.93	<250 99.00	8.34	11,993	<25.0	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds	250	250	250	250	NA	NA	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA	NA

*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".

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source and permit modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Modification (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Mechanical Blaster EU #1	7.67	7.67	7.67	0	0	0	0	0	0	0
Mechanical Blaster EU #2	2.58	2.58	2.58	0	0	0	0	0	0	0
Blaster #3 EU#18	2.54	2.54	2.54	0	0	0	0	0	0	0
Mech. Blaster/Blowoff EU#19	5.48	5.48	5.48	0	0	0	0	0	0	0
Mechanical Blaster 5 EU# 21	8.76	8.76	8.76	0	0	0	0	0	0	0
Mechanical Blaster 6 EU#23	6.57	6.57	6.57	0	0	0	0	0	0	0
Electric Arc Stick Welding EU#9	11.98	11.98	11.98	0	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30.39	30.39	30.39	0	0	0	0	0	0	0
Slab Grinders EU#11	98.60	98.60	98.60	0	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44.39	44.39	44.39	0	0	0	0	0	0.24	0.22 Manganes e
Submerged Arc Welding EU#17	7.95	7.95	7.95	0	0	0	0	0	2.43	2.43 Manganes e
Part Washers EU#12	0	0	0	0	0	2.43	0	0	0	0
Paint Booth EU#15	2.00	2.00	2.00	0	0	96.02	0	0	18.20	6.41 Hexane
Paint Booth EU#20	1.63	1.63	1.63	0	0		0	0		
Paint Booth EU#22	16.06	16.06	16.06	0	0		0	0		
Combustion Units	0.19	0.75	0.75	0.06	9.93	0.55	8.34	11,993	0.19	0.18 Hexane
Total PTE of Entire Source	246.77	247.34	247.34	0.06	9.93	99.00	8.34	11,993	<25.0	<10
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source/ Emission Offset/ Nonattainment NSR Major Source Thresholds	250	250	250	250	100	100	250	100,000	NA	NA

*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".

This modification to an existing PSD major stationary source will change the PSD major status of the entire source, because the source has agreed to limit the potential to emit of all attainment regulated pollutants from the entire source to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (1) The PM, PM10, and PM2.5 emissions from the following units shall not exceed the emission limits listed in the table below:

Unit Description	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr) ⁴
Mechanical Blaster #1 ¹	Baghouse #1	1.75	1.75	1.75
Mechanical Blaster #4 ²	Baghouse #2	0.59	0.59	0.59
Mechanical Blaster #3 ²	Baghouse #18	0.58	0.58	0.58
Mechanical Blaster #5 ¹	Baghouse #21	2.00	2.00	2.00
Mechanical Blaster #6 ³	Baghouse #23	1.50	1.50	1.50
Mechanical Blaster/Blowoff EU#19 ²	Baghouse #19	1.25	1.25	1.25

¹ Due to this modification the source requested to decrease the PM and PM10 emission limit for mechanical blaster #1 from 2.68 pounds per hour to 1.75 pounds per hour and the PM and PM10 emission limit for mechanical blaster #5 from 2.57 pounds per hour to 2.00 pounds per hour. This is a Title 1 change.

² These existing PM and PM10 emission limits did not require revision due to this modification

³ These are new emission limits due to this modification.

⁴ Due to this modification the source requested to limit PM2.5 emission from the entire source to less than 250 tons per year. This is a Title 1 change.

- (2) The amount of steel slab from the three (3) slab grinders, identified as EU #11 to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month.

Note: This is an existing limit and did not require revision due to this modification.

- (3) The PM emissions shall not exceed 0.0493 percent of steel slabs. Compliance with these limits will limit the PM emissions from the steel slab to be less than 98.6 tons per year.

Note: This is an existing limit and did not require revision due to this modification.

- (4) The PM10 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with these limits will limit the PM10 emissions from the steel slab to be less than 98.6 tons per year.

Note: This is an existing limit and did not require revision due to this modification.

- (5) The PM2.5 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with these limits will limit the PM2.5 emissions from the steel slab to be less than 98.6 tons per year.

Note: This is a new emission limit because the source has requested to limit PM2.5 emission from the entire source to less than 250 tons per year. This is a Title 1 change.

Compliance with these limits, combined with the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

This modification to an existing PSD major stationary source will change the PSD major status of the entire source, because the source has agreed to limit the potential to emit of all attainment regulated pollutants from the entire source to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

This modification to an existing Emission Offset major stationary source will change the Emission Offset major status of the entire source, because the source has agreed to limit the potential to emit of all nonattainment regulated pollutants from the entire source to less than the Emission Offset major source threshold levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the source shall comply with the following:

- (1) The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #20, and EU #22, shall be limited such that the VOC emissions shall not exceed 96.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Note: In order to render 326 IAC 2-2 (PSD) not applicable, the VOC input to paint booth EU #22 was previously limited to 197 tons per year. The VOC emissions from paint booths EU #15 and EU #20 were previously unlimited. Lake County is now nonattainment for the eight (8) hour ozone standard. Therefore, the source has requested to limit the combined VOC emissions from the three (3) paint booths, in order to render 326 IAC 2-3 not applicable. This will allow the source flexibility to determine how to allocate the VOC usage across the three (3) paint booths. This is a Title 1 change.

Compliance with this limit will be determined using the following equation:

$$\text{Total VOC Emissions} = [(\text{VOC Input EU \#15})] + [(\text{VOC Input EU \#20}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{VOC Input EU \#22})]$$

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-3 (Emission Offset) not applicable.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

NSPS:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

NESHAP:

- (b) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63.11514, Subpart XXXXXX), because this source is primarily engaged in operations of manufacturing fabricated metal products (SIC code 3499), which is one of the nine source categories listed in 40 CFR 63.11514. The new mechanical blaster #6 is subject to the requirements of this NESHAP, since it is a dry abrasive blasting operation that uses materials that contain metal fabrication and finishing HAP (MFHAP) or that have the potential to emit MFHAP. MFHAP compounds include compounds of cadmium, chromium, lead, manganese, and nickel. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material.

The mechanical blaster #6 is subject the following applicable portions of the NESHAP:

- (1) 40 CFR 63.11514(a)(4), (b)(1), and (d)
- (2) 40 CFR 63.11515(b)
- (3) 40 CFR 63.11516(a)(2 and 3)
- (4) 40 CFR 63.11517(a) and (b)
- (5) 40 CFR 63.11519(a), (b)(1 through 5), (c)(1, 2, 13, and 15)
- (6) 40 CFR 63.11521
- (7) 40 CFR 63.11522
- (8) 40 CFR 63.11523
- (9) Table 1
- (10) Table 2

There are no testing requirements applicable to this source.

The requirements of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the units except as otherwise specified in 40 CFR 63, Subpart XXXXXX.

- (c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
- (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

CAM Applicability Analysis							
Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (ton/yr)	Controlled PTE (ton/yr)	Part 70 Major Source Threshold (ton/yr)	CAM Applicable (Y/N)	Large Unit (Y/N)
Mechanical Blaster #6 - PM	Baghouse	Y	155.88	4.51	100	Y	N
Mechanical Blaster #6 - PM10	Baghouse	Y	155.88	4.51	100	Y	N
Mechanical Blaster #6 - PM2.5	Baghouse	Y	155.88	4.51	100	Y	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are applicable to the mechanical blaster #6 for PM, PM10, and PM2.5 upon issuance of the Title V Renewal. A CAM plan must be submitted as part of the next Renewal application.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.

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

The operation of this source will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations For Manufacturing Processes)

The requirements of 326 IAC 6-3-2 are not applicable to mechanical blaster #6 because it is subject to a more stringent particulate matter limit under 326 IAC 6.8 (Particulate Matter Limitations For Lake County).

326 IAC 6.8 (Particulate Matter Limitations For Lake County)

- (a) This source is located in Lake County, is not specifically listed in 326 IAC 6.8-2, and has potential to emit greater than one hundred (100) tons of particulate matter per year. Therefore, pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from mechanical blaster #6 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

The baghouse shall be in operation at all times when mechanical blaster #6 is in operation, in order to comply with this limit.

- (b) The existing paint booths, identified as EU #15, EU #20, and EU #22 are currently subject to the particulate matter emission limit in 326 IAC 6.8-1-2(a). However, on March 21, 2012, 326 IAC 6.8-1-2 was revised to include new requirements for surface coating processes.

Pursuant to 326 IAC 6.8-1-2(h), the paint booths, identified as EU #15, EU #20, and EU #22, shall each be controlled by particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.

- (i) The paint booth, identified as EU #20 is equipped with dry filters, therefore; this paint booth can comply with 326 IAC 6.8-1-2(h).

- (ii) The paint booths, identified as EU #15 and EU #22, paint large steel bridge girders in an enclosed building. Due to the size of the parts being coated each booth is uncontrolled.

Pursuant to 326 IAC 6.8-1-2(h), the Permittee shall use the following work practices as an equivalent control device:

- (1) Conduct all spray coating operations within an enclosed building;
- (2) Close man doors, overhead doors and powered vents located within 100 feet of the spray equipment, and keep them closed during spray operations;
- (3) Collect dry-fall paint on floor surfaces; and
- (4) Collect and dispose dry-fall paint from floor surfaces to prevent re-entrainment to exhaust air.

Note: These are new requirements due to a change in applicability.

326 IAC 8-2-9 (Miscellaneous metal and plastic parts coating operation)

The three (3) paint booths, identified as EU #15, EU #20, and EU #22 are currently subject to 326 IAC 8-2-9. However, on October 20, 2010, this rule was revised. As a result, IDEM is reevaluating the applicability of 326 IAC 8-2-9.

(a) EU #15

Pursuant to 326 IAC 8-2-1(a)(5), the paint booth, identified as EU #15 is still subject to 326 IAC 8-2-9 because it is located in Lake County, has actual before control VOC emissions greater than fifteen (15) pounds per day and it coats metal parts.

Pursuant to 326 IAC 8-2-9(a)(2)(F), sources located in Lake County shall comply with 326 IAC 8-2-9(d) and (f) for the metal surface coating of fabricated metal products.

- (1) Pursuant to 326 IAC 8-2-9(d)(1)(A), on or after April 1, 2011, the owner or operator engaged in the surface coating of miscellaneous metal or plastic parts and products in which the total actual VOC emissions from all miscellaneous metal or plastic parts or products coating operations, including related cleaning activities, are equal to or exceed fifteen (15) pounds per day, before add-on controls, located in Lake County or Porter County, shall comply with the VOC limits based on low VOC coatings as follows:
 - (A) For extreme performance coatings the volatile organic compound (VOC) content of the as applied coating delivered to the applicator at the paint booth and of the cleanup solvents shall be less than 3.5 pounds of VOC per gallon of coating, excluding water.

Currently, all coatings used in paint booth EU #15 are in compliance with this rule. The source continues to require the flexibility to use a wide variety of paints containing various concentrations of VOCs in order to meet customer specifications. Therefore, pursuant to 326 IAC 8-1-2(a)(7), the source has requested to continue to be able to use daily volume weighted averaging to show compliance when using non compliant coatings.

When non compliant coatings are used the daily volume weighted average shall be determined using the following equation:

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

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied;

and U is the usage rate of the coating in gallons per day.

- (2) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application in EU #15:

Electrostatic equipment

High volume low-pressure (HVLP) spray equipment

Flow coating

Roller coating

Dip coating, including electrodeposition

Airless spray

Air-assisted airless spray

Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

This booth currently uses airless spray equipment.

- (b) EU #22

Pursuant to 326 IAC 8-2-1(a)(5), the paint booth, identified as EU #22 is still subject to 326 IAC 8-2-9 because it is located in Lake County, has actual before control VOC emissions greater than fifteen (15) pounds per day and it coats metal parts.

Pursuant to 326 IAC 8-2-9(a)(2)(F), sources located in Lake County shall comply with 326 IAC 8-2-9(d) and (f) for the metal surface coating of fabricated metal products.

- (1) Pursuant to 326 IAC 8-2-9(d)(1)(A), on or after April 1, 2011, the owner or operator engaged in the surface coating of miscellaneous metal or plastic parts and products in which the total actual VOC emissions from all miscellaneous metal or plastic parts or products coating operations, including related cleaning activities, are equal to or exceed fifteen (15) pounds per day, before add-on controls, located in Lake County or Porter County, shall comply with the VOC limits based on low VOC coatings as follows:

- (A) For extreme performance coatings the volatile organic compound (VOC) content of the as applied coating delivered to the applicator at the paint booth and of the cleanup solvents shall be less than 3.5 pounds of VOC per gallon of coating, excluding water.

Currently, all coatings used in paint booth EU #22 are in compliance with this rule. The source continues to require the flexibility to use a wide variety of paints containing various concentrations of VOCs in order to meet customer specifications. Therefore, pursuant to 326 IAC 8-1-2(a)(7), the source has requested to continue to be able to use daily volume weighted averaging to show compliance when using non compliant coatings.

When non compliant coatings are used the daily volume weighted average shall be determined using the following equation:

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

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied;

and U is the usage rate of the coating in gallons per day.

Note: Paint booths EU #15 and EU #22 are separate facilities under 326 IAC 8-2. Therefore, the source can only use daily averaging for coatings used within a facility. A source cannot include in a daily average coatings used in another facility.

- (2) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application in EU #22:

Electrostatic equipment

High volume low-pressure (HVLP) spray equipment

Flow coating

Roller coating

Dip coating, including electrodeposition

Airless spray

Air-assisted airless spray

Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

This booth currently uses airless spray equipment.

- (c) EU #20

Pursuant to 326 IAC 8-2-1(a)(5), the paint booth, identified as EU #20 is still subject to 326 IAC 8-2-9 because it is located in Lake County, has actual before control VOC emissions greater than fifteen (15) pounds per day and it coats metal parts.

Pursuant to 326 IAC 8-2-9(a)(2)(F), sources located in Lake County shall comply with 326 IAC 8-2-9(d) and (f) for the metal surface coating of fabricated metal products.

- (1) Pursuant to 326 IAC 8-2-9(d)(1)(B), on or after April 1, 2011, the owner or operator engaged in the surface coating of miscellaneous metal or plastic parts and products in which the total actual VOC emissions from all miscellaneous metal or plastic parts or products coating operations, including related cleaning activities, are equal to or exceed fifteen (15) pounds per day, before add-on controls, located in Lake County or Porter County, shall comply with the VOC limits based on low VOC coatings and add-on controls (VOC per volume solids), except for motor vehicle materials, as follows:

- (A) For extreme performance coatings the volatile organic compound (VOC) content of the as applied coating delivered to the applicator at the paint booth and of the cleanup solvents shall be less than 6.67 pounds of VOC per gallon of coating solids, excluding water.

Based on the calculations in TSD Appendix A, the coating used in EU #20 has an as applied VOC content of 21.60 pounds per gallon of coating solids, excluding water. This exceeds the allowable VOC content in 326 IAC 8-2-9(d)(1)(B) for extreme performance coatings. Therefore, the source cannot use this option to comply with 326 IAC 8-2-9.

- (2) EU #20 will achieve compliance with 326 IAC 8-2-9(d)(1)(B) using an add-on control device under 326 IAC 8-2-9(d)(3). Therefore, EU #20 is not subject to the requirements of 326 IAC 8-2-9(d)(2).
- (3) Pursuant to 326 IAC 8-2-9(d)(3), an owner or operator that does not use low VOC coatings and application methods specified under 326 IAC 8-2-9(d)(2) must achieve compliance with this subsection by using a capture and control device that achieves a minimum overall VOC control efficiency of ninety percent (90%).

Due to this re-evaluation of the applicable requirements of 326 IAC 8-2-9, the overall control efficiency needed for compliance increased from equal to or greater than sixty nine percent (69%) to an overall control efficiency of equal to or greater than ninety percent (90%).

- (d) EU #s 15, 22, and 20
Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
 - (i) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.
 - (iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.
 - (iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.
 - (v) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Based on IDEM's review it does not appear that the coatings qualify as high performance architectural coatings or prefabricated architectural coatings. Pursuant to 40 CFR Part 59, Subpart D – National Volatile Organic Compound Emission Standards for Architectural Coatings, architectural coating is defined as follows:

“A coating recommended for field application to stationary structures and their appurtenances, to portable buildings, to pavements, or to curbs. This definition excludes adhesives and coatings recommended by the manufacturer or importer solely for shop applications or solely for application to non-stationary structures, such as airplanes, ships, boats, and railcars.”

The product sheet for Interplate 997 Nippe Ceramo SW, which is used in paint booth EU #20 states that it is intended to be used as a shop primer for the protection of steel during fabrication and assembly. Therefore, it does not appear to meet the definition of an architectural coating because it is not recommended for use during field application. As a result, IDEM believes the coatings used fit under the extreme performance coating category and will revise the permit accordingly.

326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)

This source currently has a degreasing operation, identified as EU #12, which is subject to 326 IAC 8-3-2. On January 30, 2013, 326 IAC 8-3-2 was revised. As a result, IDEM is reevaluating the applicability of 326 IAC 8-3-2. The cold cleaner degreasing operation was constructed after July 1, 1990 and is not equipped with a remote solvent reservoir. Therefore, this operation is subject to the requirements of 326 IAC 8-3-2.

- (a) Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

Note: These are new requirements due to a change in applicability.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

The degreasing operation, identified as EU #12, is currently subject to 326 IAC 8-3-5. However, on January 30, 2013, this rule was repealed. Therefore, the degreasing operation is no longer subject to this rule and the requirements of this rule will be removed from the permit.

326 IAC 8-3-8 (Material Requirements for cold cleaner degreasers)

326 IAC 8-3-8 applies to any person who sells, offers for sale, uses, or manufacturers solvent for use in cold cleaner degreasers before January 1, 2015, in Clark, Floyd, Lake or Porter Counties or on and after January 1, 2015, anywhere in the state. This source is located in a Lake County and uses solvent in cold cleaner degreasers. Therefore, the degreasing operation, identified as EU #12 is subject to the requirements of 326 IAC 8-3-8.

(a) Material requirements are as follows:

(1) No person shall operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Record keeping requirements are as follows:

(1) All persons subject to the requirements of subsection (a)(1) shall maintain each of the following records for each purchase:

(A) The name and address of the solvent supplier.

(B) The date of purchase (or invoice/bill date of contract servicer indicating service date).

(C) The type of solvent purchased.

(D) The total volume of the solvent purchased.

(E) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

(c) All records required by subsection (b) shall be:

(1) retained on-site or accessible electronically from the site for the most recent three (3) year period; and

(2) reasonably accessible for an additional two (2) year period.

Note: These are new requirements.

Compliance Determination and Monitoring Requirements

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

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

- (a) The compliance determination and monitoring requirements applicable to this modification are as follows:

Emission Unit/Control	Operating Parameters	Frequency
Mechanical Blaster #6 / Baghouse #23	Pressure Drop	Once per day
Paint Booth EU #15 / Uncontrolled	Overspray Observations	Weekly
Paint Booth EU #22 / Uncontrolled	Overspray Observations	Weekly

These compliance monitoring requirements are necessary to ensure compliance with 326 IAC 2-2 (PSD) and 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County). This is a Title 1 change. The emissions from paint booths EU #15 and EU#22 exhaust to general ventilation in buildings that do not have ceiling stacks or vents. Therefore, the source is not required to perform rooftop and nearby ground overspray observations.

- (b) The testing requirements applicable to this modification are as follows:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
Mechanical Blasters (EU #1, EU#2, EU #18, and EU #21))	Baghouse #1, #2, #18, and #21	PM, PM10, & PM2.5	No later than five (5) years from the most recent valid compliance determination	Once every five (5) years*
Mechanical Blaster #6 (EU #23)	Baghouse #23	PM, PM10, & PM2.5	Not later than 60 days after achieving maximum capacity, but no later than 180 days after initial startup	Once every five (5) years
Mechanical Blaster/Blowoff (EU #19)	Baghouse #19	PM, PM10, & PM2.5	No later than five (5) years from the most recent valid compliance determination	Once every five (5) years

*The current permit only requires the source to test one of the blasters (EU #1, #2, #18, or #21) once every five (5) years. However, the baghouses associated with these processes must each achieve an overall control efficiency of approximately 98 percent to comply with the PSD minor limit for PM, PM10, and PM2.5. Therefore, due to this modification these tests shall be repeated on a different blaster and associated control device at least once every five (5) years from the date of the most recent valid compliance demonstration to ensure the baghouses are functioning correctly and still in compliance with 326 IAC 2-2 (PSD) minor limits and 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County). The blaster tested shall be the blaster in which the longest amount of time has elapsed since its previous test. This is a Title 1 change.

The source must also perform PM, PM10, and PM2.5 testing on the new mechanical blaster to demonstrate compliance with 326 IAC 2-2 (PSD) and 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County). Finally, due to this modification the source must perform PM2.5 testing in addition to PM and PM10 testing for the mechanical blaster/blowoff (EU #19). This is a Title 1 change.

Proposed Changes

- (a) The changes listed below have been made to Part 70 Operating Permit No. 089-29933-00161. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:
- (1) Sections A.2 and D.1 have been revised to include descriptive information for the new mechanical blaster.
 - (2) The PSD minor limits in Condition D.1.1 have been revised due to the addition of the new mechanical blaster. In addition, the source has accepted PM2.5 emission limits since Lake County is now attainment for the PM2.5 standard.
 - (3) Conditions D.1.2 and D.1.3 have been revised to include the new mechanical blaster.
 - (4) Due to this modification the existing testing requirements in Condition D.1.4 have been revised to include new testing requirements for the six (6) blasters (see Compliance Determination and Monitoring Requirements Section above for more details).
 - (5) Conditions D.1.5 and D.1.6 have been revised to include the new mechanical blaster. IDEM, OAQ, has also decided to clarify Condition D.1.7 - Parametric Monitoring.
 - (6) Condition D.1.9 has been revised to include record keeping requirements to demonstrate compliance with the ground steel slab throughput limit for the slab grinders in Condition D.1.1. In addition, Condition D.1.9 has been revised to include the new mechanical blaster.
 - (7) Condition D.1.10 has been revised to reference the correct limit in Condition D.1.1.
 - (8) 326 IAC 8-2-9 was revised on October 20, 2010 and the revised rules became effective April 1, 2011. As a result, there are newly applicable requirements for miscellaneous metal coating operations in Lake County. Therefore, Condition D.2.1 has been revised to reflect the new requirements.

- (9) Effective August 9, 2012, Lake County is nonattainment for the eight (8) hour ozone standard. Prior to this modification the VOC emissions from this source were limited to less than two hundred fifty (250) ton per year in order to render 326 IAC 2-2 (PSD) not applicable. Pursuant to 326 IAC 2-3 (Emission Offset), the VOC emissions must be limited to less than one hundred (100) tons per year in order to remain a minor source. The source has requested to limit the VOC emissions from the three (3) paint booths, identified as EU #15, EU #20, and EU #22 to less than Emission Offset major source thresholds. Therefore, Condition D.2.2 has been revised to delete the existing VOC emission limit and include a new VOC emission limit for all three (3) paint booths.
- (10) Effective March 21, 2012, 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County) was revised to include new requirements for surface coating processes. Therefore, Condition D.2.3 was revised to incorporate the new requirements.
- (11) Condition D.2.5 was revised to clarify the source must operate the thermal oxidizer in order to comply with 326 IAC 8-2-9 and 326 IAC 2-3.
- (12) Condition D.2.6 - Volatile Organic Compounds (VOC) was deleted from the permit since the paint booth, identified as EU #20 is no longer required to determine compliance with 326 IAC 8-2-9 pursuant to 326 IAC 8-1-2(b).
- (13) Condition D.2.6 (formerly Condition D.2.7) has been revised to include new compliance determination equations for 326 IAC 8-2-9 and 326 IAC 2-3.
- (14) A new particulate matter compliance determination requirement has been included in Condition D.2.7 in order to ensure compliance with 326 IAC 6.8-1-2.
- (15) Conditions D.2.8 and D.2.9 (formerly Condition D.2.10) have been revised to reflect the revisions to Conditions D.2.1 and D.2.2.
- (16) Condition D.2.10 (formerly Condition D.2.11) has been revised to include newly applicable compliance monitoring requirements for the paint booths, identified as EU #15 and EU #22.
- (17) Condition D.2.11 (formerly Condition D.2.12) has been revised to include new record keeping requirements in order to document the compliance status with the new VOC emission limit in Condition D.2.2.
- (18) The existing PSD minor limits in Condition D.3.1 have been revised to include a new PM_{2.5} emission limit. In addition, IDEM has itemized the limits since PM, PM₁₀, and PM_{2.5} are separate pollutants.
- (19) Condition D.3.5 - Testing Requirements has been revised to include PM_{2.5} emission testing.
- (20) Condition E.1.2 - NESHAP for Nine Metal Fabrication and Finishing Source Categories has been revised to include additional applicable requirements.
- (21) The existing VOC Quarterly Report has been revised to reflect the new VOC emission limit in Condition D.2.2.

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

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

...

Bay #8 West

- (n) **One (1) mechanical blaster #6, identified as EU #23, approved for construction in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot.**

...

SECTION D.1

FACILITY OPERATION CONDITIONS

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

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Bay #8 West

- (n) **One (1) mechanical blaster #6, identified as EU #23, approved for construction in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot.**

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

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

The Permittee shall comply with the following requirements:

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

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following requirements:

- (a) The PM, PM₁₀, and PM_{2.5} emissions from the following processes shall not exceed the emission limits listed in the table below:

Process	Baghouse ID	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)	PM2.5 Emission Limit (lbs/hr)
Mechanical Blaster #1 (EU #1)	Baghouse #1	1.75	1.75	1.75
Mechanical Blaster #4 (EU#2)	Baghouse #2	0.59	0.59	0.59
Mechanical Blaster #3 (EU #18)	Baghouse #18	0.58	0.58	0.58
Mechanical Blaster #5 (EU #21)	Baghouse #21	2.00	2.00	2.00
Mechanical Blaster #6 (EU #23)	Baghouse #23	1.50	1.50	1.50

- (b) The amount of steel slab from the three (3) slab grinders, identified as EU #11 to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month.
- (c) The PM emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM emissions from the steel slab to be less than 98.6 tons per year.
- (d) The PM10 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM10 emissions from the steel slab to be less than 98.6 tons per year.
- (e) The PM2.5 emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM2.5 emissions from the steel slab to be less than 98.6 tons per year.

Compliance with these limits combined with Condition D.3.1 and the potential to emit PM, PM10, and PM2.5 from all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

The particulate matter (PM) emissions from the emission units, identified as EU #1, EU #2, EU #9, EU #11, EU #13 EU #18, EU #21, and EU #17, and EU #23 shall not exceed 0.03 grains per dry standard cubic foot, each.

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

A Preventive Maintenance Plan is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #17, EU#18, and EU #21, and EU #23, and its control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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Compliance Determination Requirements

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

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

- (a) **No later than five (5) years after the most recent valid compliance demonstration, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on one of the mechanical blasters, EU #1 (blaster #1), EU #2 (blaster #4), EU #18 (blaster #3), or EU #21 (blaster #5) to verify compliance with Conditions D.1.1 and D.1.2, utilizing methods as approved by the Commissioner. These tests shall be repeated on a different blaster and control device at least once every five (5) years from the date of the most recent valid compliance demonstration. The blaster tested shall be the blaster in which the longest amount of time has elapsed since its previous test. 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.**
- (b) **In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on EU #23 (blaster #6) no later than sixty (60) days after achieving maximum capacity but not later than one hundred eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.**

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

D.1.5 Particulate Matter (PM)

- (a) ~~In order to comply with Conditions D.1.1 and D.1.2, the baghouses for PM and PM₁₀ control shall be in operation and control emissions from the EU #1, EU #2, EU #18, and EU #21, and EU #23 (blasters #1, #4, #3, and #5, and #6) at all times that the blasting processes are in operation.~~

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

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D.1.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the blasting processes, at least once per day when the blasting processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses for blasters EU #1 (No. 1 Blaster #1), **EU #2 (blaster #4), EU #18 (blaster #3), EU #21 (blaster #5), EU #23 (blaster #6)** is outside the normal range of 2.0 and 6.0 inches of water, for blaster EU#2 (No. 4 Blaster) is outside the normal range of 1.0 and 8.0 inches of water and the normal range of 1.0 and 5.0 inches of water for blasters #3 and #5 (EU#18 & EU#21) or a range established during the latest stack tests, the Permittee shall take reasonable response. **The normal range for EU #1 (blaster #1) is a pressure drop range between 2.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined**

during the latest stack test. The normal range for EU #2 (blaster #4) and EU #23 (blaster #6) is a pressure drop range between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. The normal range for EU #18 (blaster #3) and EU #21 (blaster #5) is a pressure drop range between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

D.1.9 Record Keeping Requirements

- (a) **To document the compliance status with Condition D.1.1(b) - PSD Minor Limits, the Permittee shall keep monthly records of the amount of steel slab ground by the three (3) slab grinders.**
- (ab) To document the compliance status with Condition D.1.6 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of the four (4) blaster, EU#11 and the two (2) DB torch smoke eliminator stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (bc) To document the compliance status with Condition D.1.7– Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses for units EU#1, EU#2, EU#18, and EU#21, and EU#23. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading, (e.g. the process did not operate that day).
- (ed) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the record keeping required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1(eb) shall be submitted using the reporting forms located at the end of this permit, or their equivalent not later than thirty (30) days following the end of each calendar quarter being reported. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34 35). Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition.

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D.2.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-1-2] [326 IAC 8-2-9]

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

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

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

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

Where:

A is the volume weighted average in pounds VOC per gallon less water as applied;

C is the VOC content of the coating in pounds VOC per gallon less water as applied; and

U is the usage rate of the coating in gallons per day.

Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #15 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.
- (b) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #22 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.
- (c) Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating Operations), one (1) or a combination of the following equipment shall be used for coating application in the two (2) paint booths, identified as EU #15 and EU #22:
 - Electrostatic equipment
 - High volume low-pressure (HVLP) spray equipment
 - Flow coating
 - Roller coating
 - Dip coating, including electrodeposition
 - Airless spray
 - Air-assisted airless spray
 - Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying
- (d) Pursuant to 326 IAC 8-2-9(d)(3), the thermal oxidizer for the paint booth, identified as EU #20 shall achieve an overall VOC control efficiency of equal to or greater than ninety percent (90%).
- (e) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:
 - (1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.
 - (2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

- (3) **Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.**
- (4) **Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.**
- (5) **Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.**

~~D.2.2 PSD Minor Limits [326 IAC 2-2]~~

~~The Permittee shall comply with the following requirements:~~

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

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

D.2.2 Emission Offset Minor Limits [326 IAC 2-3]

The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #20, and EU #22, shall be limited such that the VOC emissions shall not exceed 96.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit of VOC to less than 100 tons per 12 consecutive month period, each, and shall render 326 IAC 2-3 (Emission Offset) not applicable.

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

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

- (a) **Pursuant to 326 IAC 6.8-1-2(h), particulate from the paint booths, identified as EU #15 and EU #22, shall be controlled by dry particulate filters, waterwash, or an equivalent control device. The Permittee shall use the following work practices as an equivalent control device:**
 - (1) **Conduct all spray coating operations within an enclosed building;**
 - (2) **Close man doors, overhead doors and powered vents located within 100 feet of the spray equipment, and keep them closed during spray operations;**
 - (3) **Collect dry-fall paint on floor surfaces; and**
 - (4) **Collect and dispose dry-fall paint from floor surfaces to prevent re-entrainment to exhaust air.**
- (b) **Pursuant to 326 IAC 6.8-1-2(h), particulate from the paint booth, identified as EU #20, shall be controlled by dry particulate filters, waterwash, or an equivalent control device, and the Permittee shall operate each control device in accordance with manufacturer's specifications.**

Compliance Determination Requirements

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

~~Pursuant to 326 IAC 8-1-2(a) and~~ **In order** to comply with Conditions D.2.1(ad) and D.2.2, the Permittee shall operate the thermal oxidizer at all times that the paint booth, **identified as EU #20** is in operation.

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

For paint booth, identified as EU #20:

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

~~The equivalency was determined by the following equation:~~

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

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

~~Where:~~

~~L = Applicable emission limit from 326 IAC 8 in pounds of VOC per gallon of coating less water;~~

~~D = Density of VOC in coating in pounds per gallon of VOC (lbs/gal) as applied; and~~

~~E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.~~

~~The emission limit in 326 IAC 8-2-8 is 3.5 pounds of VOC per gallon of coating, less water.~~

~~The maximum coating density used in the formula for the paint booth, identified as EU #20~~

~~is 7.36 lbs/gal as cited in 326 IAC 8-1-2. Therefore, the VOC limitation in terms of lbs VOC/gal coating solid shall be limited to less than 6.67 lbs VOC/gal coating solids.~~

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

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

$$= \frac{21.6 - 6.67}{21.6} \times 100$$

$$= 69\%$$

Where:

~~V = The actual VOC content of the coating or, if multiple coatings are used, the daily weighted average VOC content of all coatings, as applied to the subject coating line as determined by the applicable test methods and procedures specified in 326 IAC 8-1-4 in units of pounds of VOC per gallon of coating solids as applied.~~

~~E = Equivalent emission limit in pounds of VOC per gallon of coating solids as applied.~~

~~O = Equivalent overall efficiency of the control device as a percentage.~~

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

D.2.76 Volatile Organic Compounds (VOCs) [326 IAC 8-1-4(a)(3)][326 IAC 8-1-2(a)]

(a) Compliance with the VOC limitations contained in Conditions D.2.1 and D.2.2 shall be

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

- (b) **When using non-compliant coatings, compliance with the VOC content limit in Conditions D.2.1(a) and D.2.1(b) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis for the two paint booths, identified as EU #15 and EU #22.**

The daily volume weighted average for each paint booth shall be determined by the following equation:

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

Where:

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

- (c) **Compliance with Condition D.2.2 shall be determined no later than 30 days after the end of each month. For a particular month, this shall be based on the total volatile organic compounds emitted for that month added to the previous eleven (11)-month total VOC emitted so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period. The VOC emissions for a month can be arrived at using the following equation:**

$$\text{Total VOC Emissions} = [(\text{VOC Input EU \#15}) + [(\text{VOC Input EU \#20}) * ((100 - \% \text{ overall control efficiency from the most recent valid stack test})/100)] + [(\text{VOC Input EU \#22})]$$

D.2.7 Particulate Matter (PM) Control

The dry filter for particulate matter (PM) control shall be in operation and control emissions from the paint booth, identified as EU #20, at all times that the paint booth is in operation.

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

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

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

D.2.9 Regenerative Thermal Oxidizer Temperature

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

D.2.109 Parametric Monitoring [40 CFR 64]

...

- (b) The Permittee shall determine the 3-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in **Condition D.2.1(d)**, ~~as approved by IDEM.~~

...
D.2.140 Monitoring

- ...
- (c) **Weekly observations shall be made of the overspray from the paint booths, identified as EU #15 and EU #22 while these booths are in operation. If abnormal emissions are observed, the Permittee shall take reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.**

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

D.2.121 Record Keeping Requirements

- (a) To document compliance with Conditions **D.2.1 and D.2.2**, the Permittee shall maintain records in accordance with (1) through (~~5~~6) below. Records maintained for (1) through (~~5~~6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content and usage limits, and the VOC emission limits established in Conditions **D.2.1 and D.2.2**.
- ...
- (2) The amount of coating material and solvent less water used on a daily **and monthly** basis.
- ...
- (6) **The total weight of VOC emitted for each compliance period.**
- ...
- (b) To document compliance with Conditions ~~D.2.409~~, the Permittee shall maintain:
- (1) Continuous temperature records and 3 hour average temperature records.
- (2) The fan amperage reading.
- (c) To document the compliance status with Condition **D.2.140**, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections. The Permittee shall include in its record when an inspection is not taken and the reason for the lack of inspection (e.g. the process did not operate that day).

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D.2.132 Reporting Requirements

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

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

~~The PM and PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU#19, shall each not exceed 1.25 pounds per hour. In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following requirements:~~

- (a) **The PM emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.**
- (b) **The PM₁₀ emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.**
- (c) **The PM_{2.5} emissions from the mechanical blaster/blowoff, identified as EU #19 shall not exceed 1.25 pounds per hour.**

Compliance with these limits in combination with Condition D.1.1 and potential PM/PM₁₀ emissions from other emission units will limit the source wide PM and PM₁₀ emissions to less than two hundred fifty (250) tons of per twelve (12) consecutive month period and render the requirements of 326 IAC 2-2 (PSD) not applicable to this source. **Compliance with these limits combined with Condition D.1.1 and the potential to emit PM, PM₁₀, and PM_{2.5} from**

all other emission units at this source, shall limit the source-wide total potential to emit of PM, PM10, and PM2.5 to less than 250 tons per 12 consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

...
Compliance Determination Requirements

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

~~In order to determine compliance with Condition D.3.1, the Permittee shall perform PM and PM₁₀ testing on EU #19 utilizing methods as approved by the Commissioner once every five (5) years from the date of the most recent valid compliance determination. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.~~ **No later than five (5) years after the most recent valid compliance demonstration, the Permittee shall perform PM, PM₁₀, and PM_{2.5} testing on EU #19 (mechanical blaster/blowoff) to verify compliance with Conditions D.3.1 and D.3.2, utilizing methods as approved by the Commissioner. These tests 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. PM₁₀ and PM_{2.5} includes filterable and condensable PM.**

...
National Emission Standards for Hazardous Air Pollutants [326 IAC 2-7-5(1)]

E.1.2 National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX]

- ...
(18) 63.11521
(19) 63.11522
(20) 63.11523
(21) Table 1
(22) Table 2

...
Quarterly Report

...
Mailing Address: ~~86 North Bridge Street, Gary, Indiana 46404~~

...
Facility: ~~One (1)~~ **Three (3)** paint booths, **EU #15, EU #20, and EU #22**
Parameter: ~~VOC usage, including coatings, dilution solvents delivered to the applicators, and cleaning solvents~~ **Emissions**
Limit: ~~Less than 197 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.~~ **The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #20, and EU #22, shall be limited such that the VOC emissions shall not exceed 96.02 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**

~~Attach a signed certification to complete this report.~~

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
- (1) Effective June 28, 2011 and August 1, 2012, Lake County is attainment for the PM2.5 standard and nonattainment for the ozone standard. Therefore, Section A.1 - General Information has been revised to reflect this. This section has also been revised to reflect that this source is a minor source under emission offset rules.
 - (2) On October 27, 2010, the Indiana Air Pollution Control Board issued revisions to 326 IAC 2. These revisions resulted in changes to the rule citations listed in the permit. These changes are not changes to the underlining provisions. The change is only to cite of these rules in Section A - General Information, Section A - Emission Units and Pollution Control Equipment Summary, Section A - Specifically Regulated Insignificant Activities, Section B - Preventative Maintenance Plan, Section B - Emergency Provisions, Section B - Operational Flexibility, and Section C - Risk Management Plan.
 - (3) The descriptive information in Sections A.3 and D.4 for the degreasing operation has been revised to reflect a change in rule applicability.
 - (4) On November 3, 2011, the Indiana Air Pollution Control Board issued a revision to 326 IAC 2. The revision resulted in a change to the rule citation of the "responsible official" definition.
 - (5) The Northwest Regional Office has changed locations. The Regional Office telephone numbers have been updated in Section B - Emergency Provisions.
 - (6) IDEM, OAQ has decided to clarify the Permittee's responsibility under CAM.
 - (7) IDEM, OAQ has clarified the interaction of the Quarterly Deviation and Compliance Monitoring Report and the Emergency Provisions.
 - (8) IDEM, OAQ has clarified the Permittee's responsibility with regards to record keeping. Sections C.16 - Record Keeping Requirements and C.17 - General Reporting Requirements have also been revised to reflect that the source is no longer a major source under 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset).
 - (9) IDEM, OAQ has revised the Emergency Occurrence Report to be consistent with Section B - Emergency Provisions.
 - (10) IDEM, OAQ has deleted Condition D.2.9 - Regenerative Thermal Oxidizer Temperature because the requirements of this condition overlap with Condition D.2.1(d) and Condition D.2.10 (now Condition D.2.9) (see above for changes).
 - (11) IDEM, OAQ is revising Condition D.2.9(b) to increase clarity. The Permittee should begin monitoring against the new set point or range as soon as the valid compliant results are available (see above for changes to D.2.9(b)).
 - (12) IDEM, OAQ, has also decided to clarify Condition D.3.7 - Parametric Monitoring.
 - (13) IDEM has reevaluated the applicability of 326 IAC 8-3 (Organic Solvent Degreasing Operations) for the existing degreasing operations in Section D.4. In addition, IDEM has updated Section D.4 to include additional insignificant activities.
 - (14) Condition E.1.2 incorrectly references 326 IAC 20-29 (Hydrochloric Acid Steel

Pickling and Regeneration Plants). Therefore, IDEM has revised this condition to remove this reference.

...

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(154)][326 IAC 2-7-1(22)]

...

Source Location Status: ~~Attainment~~ **Nonattainment** for 8-hour ozone standard
~~Nonattainment for PM2.5 standard~~
Source Status: Attainment for all other criteria pollutants
Part 70 Operating Permit Program
Minor Source, under PSD **Rules and Emission Offset Rules**
~~Major Source, under Nonattainment NSR Rules~~
Minor Source, Section 112 of the Clean Air Act
Not 1 of 28 Source Categories

...

A.2 Emission Units and Pollution Control Equipment Summary
[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(154)]

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

...

A.3 Specifically Regulated Insignificant Activities
[326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(154)]

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

...

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total. [326 IAC 8-3-2] [326 IAC 8-3-58]

...

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

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

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(3435), and

...

(c) A "responsible official" is defined at 326 IAC 2-7-1(3435).

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

...

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (132)][326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

...

(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:

...

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The

PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...
B.11 Emergency Provisions [326 IAC 2-7-16]

...
(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

...
(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northwest Regional Office no later than four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

...
Northwest Regional Office phone: (219) ~~757-0265~~ **464-0233**; fax: (219) ~~757-0267~~ **464-0553**.

...
(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

...
The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...
(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(98) be revised in response to an emergency.

...
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...
B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

... Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), or (c), or (e) without a prior permit revision, if each of the following conditions is met:

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), or (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), and (c)(1), and (e)(2).

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(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:

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

C.7 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:

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)][40 CFR 64] [326 IAC 3-8]

(a) 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:

...

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

- (b) **For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.**
- (c) **For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.**

...

C.12 Risk Management Plan [326 IAC 2-7-5(121)] [40 CFR 68]

...

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6] **[40 CFR 64] [326 IAC 3-8]**

...

- (I) Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:
- (II)
 - (a) ***CAM Response to excursions or exceedances.***
 - (1) **Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**
 - (2) **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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.**
- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a QIP. The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.**
- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).**
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.**
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(a)(2) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:**

 - (1) Failed to address the cause of the control device performance problems; or**
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.**
- (h) *CAM recordkeeping requirements.***

 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(a)(2) of this condition and any activities undertaken to implement a quality**

improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

- (2) **Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.**

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

...

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

...

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

...

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2] [326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. **Support information includes the following:**

- (AA) **All calibration and maintenance records.**
- (BB) **All original strip chart recordings for continuous monitoring instrumentation.**
- (CC) **Copies of all reports required by the Part 70 permit.**

Records of required monitoring information include the following:

- (AA) **The date, place, as defined in this permit, and time of sampling or measurements.**
- (BB) **The dates analyses were performed.**
- (CC) **The company or entity that performed the analyses.**
- (DD) **The analytical techniques or methods used.**
- (EE) **The results of such analyses.**
- (FF) **The operating conditions as existing at the time of sampling or measurement.**

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.

...

- ~~(c) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:~~

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

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] **[40 CFR 64] [326 IAC 3-8]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph.** Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

On and after the date by which the Permittee must use monitoring that meets the

requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;**
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and**
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.**

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

...

~~(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C—General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:~~

- ~~(1) The annual emissions, in tons per year, from the project identified in (e)(1) in Section C—General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C—General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and~~
- ~~(2) The emissions differ from the preconstruction projection as documented and maintained under Section C—General Record Keeping Requirements (c)(1)(C)(ii).~~

~~(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:~~

- ~~(1) The name, address, and telephone number of the major stationary source.~~
- ~~(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C—General Record Keeping Requirements.~~
- ~~(3) The emissions calculated under the actual-to-projected-actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).~~
- ~~(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.~~

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue

MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2254

~~(g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17-1.~~

...
SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]:
...

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

...
SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]:
...

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

...
...
D.2.132 Reporting Requirements

A quarterly summary of the monthly VOC emissions to document the compliance status with Condition D.2.2 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(3435).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]:
...

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(132)]

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

...
D.3.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the mechanical blaster/blowoff process, at least once per day when the mechanical blaster/ blowoff process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse for mechanical blaster/blowoff is outside the normal range of 1.5 to 6.5 inches of water or a range established during the latest stack tests. ~~The Permittee shall take reasonable response.~~ **The normal range for EU #19 (mechanical blaster/blowoff) is a**

pressure drop range between 1.5 and 6.5 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C-Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(154)]: - Insignificant Activities	
...	
(b)	Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total.[326 IAC 8-3-2] [326 IAC 8-3-58]
(c)	The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]
(ed)	Any of the following structural steel and bridge fabrication activities:
...	
(d)	Any unit emitting less than five (5) pounds per hour or twenty-five (25) pounds per day of particulate matter: Hand grinding.[326 IAC 6.8-1-42]
...	

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

... D.4.2 Volatile Organic Compounds (VOCs) [326 IAC 8-3-2]

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

- ~~(a) Equip the cleaner with a cover;~~
 - ~~(b) Equip the cleaner with a facility for draining cleaned parts;~~
 - ~~(c) Close the degreaser cover whenever parts are not being handled in the cleaner;~~
 - ~~(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;~~
 - ~~(e) Provide a permanent, conspicuous label summarizing the operation requirements;~~
 - ~~(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.~~
- (a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall ensure the following control equipment and operating requirements are met for the four (4) parts washers, identified as EU #12:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.

- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.**
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).**
 - (6) Store waste solvent only in closed containers.**
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.**
- (b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met the four (4) parts washers, identified as EU #12:**
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):**
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.**
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.**
 - (C) A refrigerated chiller.**
 - (D) Carbon adsorption.**
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.**
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.**
 - (3) If used, solvent spray:**
 - (A) must be a solid, fluid stream; and**
 - (B) shall be applied at a pressure that does not cause excessive splashing.**

~~D.4.3 Volatile Organic Compounds (VOCs) [326 IAC 8-3-5]~~

- ~~(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:~~
- ~~(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:~~
 - ~~(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));~~

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

D.4.3 Volatile Organic Compounds (VOC) [326 8-3-8]

Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

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

D.4.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.3, the Permittee shall maintain each of the following records for each purpose:**

- (1) **The name and address of the solvent supplier.**
 - (2) **The date of purchase (or invoice/bill date of contract servicer indicating service date).**
 - (3) **The type of solvent purchased.**
 - (4) **The total volume of the solvent purchased.**
 - (5) **The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).**
 - (6) **All records required by Condition D.4.4(a)(1) through (5) shall be:**
 - (A) **retained on-site or accessible electronically from the site for the most recent three (3) year period; and**
 - (B) **reasonably accessible for an additional two (2) year period.**
- (b) **Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required to be maintained by this condition.**

...
SECTION E.1 EMISSION UNIT OPERATION CONDITIONS

Emission Units Description [326 IAC 2-7-5(154)]: - The Source
...

...
E.1.2 National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories [40 CFR 63, Subpart XXXXXX]

Pursuant to 40 CFR 63, Subpart XXXXXX} (**included as Attachment A of this permit**), the Permittee shall comply with the provisions of the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories because it is operating in an area source that is primarily engaged in the operations of Fabric Structural Metal Manufacturing; ~~which are incorporated by reference as 326 IAC 20-29~~ for the source's emission **units** as specified as follows:

...
Quarterly Report

...
~~Mailing Address: 86 North Bridge Street, Gary, Indiana 46404~~

...
The Quarterly Deviation and Compliance Monitoring Report

This report shall be submitted quarterly based on a calendar year. **Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C-General Reporting.** Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

...
Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-32748-00161 and Significant Permit Modification No. 089-32762-00161. The staff recommends to the Commissioner that this Part 70 Significant Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Brian Williams at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCM 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5375 or toll free at 1-800-451-6027 extension 4-5375.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emissions Calculations
Emission Summary**

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

Uncontrolled Potential Emissions (tons/year)										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Hexane	Total HAPs
Mechanical Blaster EU #1	586.79	586.79	586.79	0	0	0	0	0	0	0
Mechanical Blaster 4 EU #2	128.36	128.36	128.36	0	0	0	0	0	0	0
Blaster 3 EU#18	126.14	126.14	126.14	0	0	0	0	0	0	0
Mech. Blaster/Blowoff EU # 19	272.67	272.67	272.67	0	0	0	0	0	0	0
Mechanical Blaster 5 EU #21	630.72	630.72	630.72	0	0	0	0	0	0	0
Mechanical Blaster 6 EU#23	155.88	155.88	155.88	0	0	0	0	0	0	0
Electric Arc Stick welding EU# 9	11.98	11.98	11.98	0	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30.39	30.39	30.39	0	0	0	0	0	0	0
Slab Grinders EU#11	302.31	302.31	302.31	0	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44.39	44.39	44.39	0	0	0	0	0	0	0.24
Submerged Arc welding EU#17	7.95	7.95	7.95	0	0	0	0	0	0	2.43
Part Washers EU# 12	0	0	0	0	0	2.43	0	0	0	0
Paint Booth EU#15	2.00	2.00	2.00	0	0	19.50	0	0	6.41	18.20
Paint Booth EU#20	2.72	2.72	2.72	0	0	30.24	0	0		
Paint Booth EU#22	16.06	16.06	16.06	0	0	288.22	0	0		
Combustion units	0.19	0.75	0.75	0.06	9.93	0.55	8.34	11,993	0.18	0.19
Total Emissions	2,319	2,319	2,319	0.06	9.93	340.93	8.34	11,993	6.60	21.07

**Appendix A: Emissions Calculations
Emission Summary**

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

Limited Potential Emissions (tons/year)										
Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e	Hexane	Total HAPs
Mechanical Blaster EU #1	7.67	7.67	7.67	0	0	0	0	0	0	0
Mechanical Blaster 4 EU #2	2.58	2.58	2.58	0	0	0	0	0	0	0
Blaster 3 EU#18	2.54	2.54	2.54	0	0	0	0	0	0	0
Mech. Blaster/Blowoff EU #19	5.48	5.48	5.48	0	0	0	0	0	0	0
Mechanical Blaster 5 EU#21	8.76	8.76	8.76	0	0	0	0	0	0	0
Mechanical Blaster 6 EU#23	6.57	6.57	6.57	0	0	0	0	0	0	0
Electric Arc Stick welding EU# 9	11.98	11.98	11.98	0	0	0	0	0	0	0
Plate Sweep Grinder EU#11	30.39	30.39	30.39	0	0	0	0	0	0	0
Slab Grinders EU#11	98.60	98.60	98.60	0	0	0	0	0	0	0
Oxy Methane Cutting EU#13	44.39	44.39	44.39	0	0	0	0	0	0	0.24
Submerged Arc welding EU#17	7.95	7.95	7.95	0	0	0	0	0	0	2.43
Part Washers EU# 12	0	0	0	0	0	2.43	0	0	0	0
Paint Booth EU#15	2.00	2.00	2.00	0	0	96.02	0	0	6.41	18.20
Paint Booth EU#20	1.63	1.63	1.63	0	0		0	0		
Paint Booth EU#22	16.06	16.06	16.06	0	0		0	0		
Combustion units	0.19	0.75	0.75	0.06	9.93	0.55	8.34	11,993	0.18	0.19
Total Emissions	246.77	247.34	247.34	0.06	9.93	99.00	8.34	11,993	6.59	Single HAP <10 Combined HAPs < 25

**Appendix A: Emissions Calculations
Blasters**

Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013

Potential To Emit PM/PM10					Controlled	326 IAC 2-2	Limited
Unit ID/Emission Unit	Outlet Grain Loading	Air Flow (dscf/min)	Control Efficiency %	PTE (ton/yr)*	tpy	lb/hr	ton/yr
EU #1	Blaster 1	0.02	15,630	98%	587	11.74	7.67
EU #2	Blaster 4	0.02	3,419	98%	128	2.57	2.58
EU #18	Blaster 3	0.006	11,200	98%	126	2.52	2.54
EU #19	Blaster/Blowoff	0.005	29,052	98%	273	5.45	5.48
EU #21	Blaster 5	0.0056	30,000	99%	631	6.31	8.76
Total					1,745		

Methodology

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

Unit ID	Inlet Grain Loading (gr/scf)*	Outlet Grain Loading** (gr/scf)	Air flow rate (scfm)	Capture Efficiency	Control Efficiency	Uncontrolled Particulate PTE (lb/hr)	Uncontrolled Particulate PTE (tons/yr)	Controlled Particulate PTE (lb/hr)	Controlled Uncontrolled Particulate PTE (tons/yr)	Limited Particulate PTE (lb/hr)	Limited Particulate PTE (tons/yr)
Blaster 6 EU#23	0.346	0.01	12,000	100.00%	99.80%	35.59	155.88	1.03	4.51	1.50	6.57

Methodology

* Based on manufacturer inlet loading rate calculations

** Outlet grain loading guarantee

Uncontrolled Particulate PTE (lb/hr) = Inlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)

Controlled Particulate PTE (lb/hr) = Outlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)

Uncontrolled/Controlled PTE (tons/yr) = Uncontrolled/Controlled Particulate PTE * 8,760 (hr/yr) * 1/2,000 (ton/lb)

Assumes PM10 and PM2.5 = PM

Electric Arc Welding Stick

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

Methodology

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

EU # 11 (Sweep Grinder)

Unit ID	Max. Area of Steel Swept (sq ft/hr)	Max. lb PM/ft sq of Area Swept*	Hours of operation/ yr	Uncontrolled PM/PM10 (tons/yr)
EU # 11	75	0.0925	8,760	30.4

Methodology

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

EU #11 (3 Slab Grinders)

Unit ID	Max. Grind Capacity (ton/yr)	PM emitted from Grinding operation (%)*	Uncontrolled PM/PM10 (tons/yr)	Limited Throughput tpy	Limited PM/PM10 Emissions
EU #11	613,200	0.0493	302.3	200,000	98.60

Methodology

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

* Provided by the source

**Appendix A: Emissions Calculations
Thermal Cutting**

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

EU # 13 (Oxy methane Cutting Torches)

FLAME CUTTING	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
				PM/PM10	Mn	Ni	Cr	PM/PM10	Mn	Ni	Cr	
Oxyacetylene	40	3.375	7	0.1622	0.0005	0.0001	0.0003	9.197	0.028	0.006	0.017	0.051
Oxymethane	7	9.1	3	0.0815	0.0002	--	0.0002	0.934	0.002	0.000	0.002	0.005
Plasma**	2	12	9.4	0.0039				0.004	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								10.14				0.06
Potential Emissions tons/year								44.39				0.24

METHODOLOGY

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick rather than 1 inch, and the maximum metal thickness is not used in Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,C
Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations
Welding**

Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013

EU #17 (Surmerged Arc Welders)

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Submerged Arc	12	4.2	0.036	0.011			1.814	0.554	0.000	0	0.554
Metal Inert Gas (MIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
Stick (E7018 electrode)	0	0	0.0211	0.0009			0.000	0.000	0.000	0	0.000
Tungsten Inert Gas (TIG)(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
Oxyacetylene(carbon steel)	0	0	0.0055	0.0005			0.000	0.000	0.000	0	0.000
EMISSION TOTALS											
Potential Emissions lbs/hr							1.81				0.55
Potential Emissions tons/year							7.95				2.43

METHODOLOGY

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

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

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

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

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

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

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lb/hr)	Potential VOC (ton/yr)	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
EU #15 Solvent	7.40	16.0%	0%	16.0%	0%	0%	3.760	1	1.18	1.18	4.45	19.50	2.00	N/A	98%
EU # 20 GTA cleaner	6.93	100.0%	0%	100.0%	0%	0%	0.061	1	6.93	6.93	0.42	1.85	0.00	N/A	100%
EU #20 997 Primer	7.47	72.3%	0%	72.3%	0%	25%	1.200	1	5.40	5.40	6.48	28.39	2.72	21.60	75%
EU #22 Paint	7.40	47.3%	0%	47.3%	0%	0%	18.800	1	3.50	3.50	65.80	288.22	16.06	N/A	95%
												337.96	20.77		

State Potential Emissions

Add worst case coating to all solvents

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

METHODOLOGY

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

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

Controlled Emissions = Uncontrolled Potential to Emit (ton/yr) x (1 - Control Efficiency %)

**Appendix A: Emission Calculations
HAP Emission Calculations**

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

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

METHODOLOGY

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

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

**Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161**

**Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013**

Unit	Capacity
Boiler (EU#7)	1.8
61 Space Heaters (EU#8)	14.2
4 Torches (EU#14)	1.2
1 Cure Oven	1.4
1 Preheat Oven	2.58
1 Thermal Oxidizer	1.5
Total	22.68

Heat Input Capacity MMBtu/hr	MMCF/yr
22.68	198.7

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.19	0.75	0.75	0.06	9.93	0.55	8.34

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	2.086E-04	1.192E-04	7.450E-03	1.788E-01	3.378E-04

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.967E-05	1.093E-04	1.391E-04	3.775E-05	2.086E-04

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	11,921	2.28E-01	2.19E-01
Summed Potential Emissions in tons/yr	11,921		
CO2e Total in tons/yr	11,993		

Total HAPs (tons/yr) =	0.19
Worst Single HAP (tons/yr) =	0.18 Hexane

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

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

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

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

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
Insignificant Activities**

Source Name: Industrial Steel Construction, Inc
Source Location: 86 North Bridge Street, Gary, IN 46404
Significant Source Modification Number: 089-32748-00161
Significant Permit Modification Number: 089-32762-00161
Permit Reviewer: Brian Williams
Date: 1/17/2013

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

HAPs From Degreasing

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Daniel Moore
Industrial Steel Construction, Inc.
86 North Bridge Street
Gary, IN 46404

DATE: July 19, 2013

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

SUBJECT: Final Decision
Significant Permit Modification to a Part 70 Operating Permit
089-32762-00161

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

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

A copy of the final decision and supporting materials has also been sent via standard mail to:
Susan Grenzebach, ST Environmental, LLC
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 6/13/2013



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Governor

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Commissioner

July 19, 2013

TO: Gary Public Library – Brunswick Branch

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

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

Applicant Name: Industrial Steel Construction, Inc.
Permit Number: 089-32762-00161

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

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

Enclosures
Final Library.dot 6/13/2013

Mail Code 61-53

IDEM Staff	VHAUN 7/19/2013 Industrial Steel Construction, Inc. 089-32762-00161 FINAL		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Daniel E Moore Industrial Steel Construction, Inc. 86 N Bridge St Gary IN 46404 (Source CAATS)		Confirmed Delivery								
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
9		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
10		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
11		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
12		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
13		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
14		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
15		Susan Grenzebach ST Environmental, LLC 209 S. Calumet, Suite 5 Chesterton IN 46034 (Consultant)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
3		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
4		Gary Public Library 4030 West 5th Avenue Gary IN 46406 (Library)										
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
6		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)										
7		Matt Mikus Post Tribune 1433 E 83rd Avenue Merrillville IN 46410 (Affected Party)										
8												
9												
10												
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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