



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: May 22, 2013

RE: Steel Dynamics, Inc. / 019-33061-00089

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval 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) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-MOD.dot 12/3/07



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May 22, 2013

Mr. Barry Smith
Steel Dynamics, Inc.
4500 County Road 59
Butler, IN 46721

Re: 019-33061-00089
First Minor Revision to
M019-30060-00089

Dear Mr. Smith:

Steel Dynamics, Inc. was issued a Minor Source Operating Permit (MSOP) Renewal No. M019-30060-00089 on December 15th, 2011 for a stationary steel coil coating facility located at 5134 Loop Road, Jeffersonville, Indiana. On April 9th, 2013, the Office of Air Quality (OAQ) received an application from the source requesting to add a small scrap metal sorting operation. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6, these changes to the permit are required to be reviewed in accordance with the Minor Permit Revision (MPR) procedures of 326 IAC 2-6.1-6(h). Pursuant to the provisions of 326 IAC 2-6.1-6, a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

Steel Dynamics, Inc.
Jeffersonville, Indiana
Permit Reviewer: Brian Williams

Page 2 of 2
MSOP MPR No. 019-33061-00089

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

Attachments: Technical Support Document and revised permit

IC/BMW

cc: File - Clark County
Clark County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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**Minor Source Operating Permit Renewal
OFFICE OF AIR QUALITY**

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

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

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

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

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

Minor Permit Revision No.: 019-33061-00089	
Issued by:  Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: May 22, 2013 Expiration Date: December 15, 2021

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SECTION A

SOURCE SUMMARY

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

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

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

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

A.2 Emission Units and Pollution Control Equipment Summary

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

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

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, approved for construction in 2006 and constructed in 2008, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

- (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven.

This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.

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

These two ovens are heated by an integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour.

The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

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

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

- (g) One (1) outdoor scrap metal sorting operation, with a nominal metal processing throughput of 40.0 tons per hour, and consisting of the following:
- (1) Two (2) oxypropane torches, approved for construction in 2013, cutting galvanized pipes and coils with a nominal thickness of 0.0625 inches and a nominal cutting rate of 12.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (2) Four (4) oxypropane torches, approved for construction in 2013, cutting metal plates with a nominal thickness of 4.0 inches and a nominal metal cutting rate of 20.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (3) One (1) oxypropane torch, approved for construction in 2013, cutting mandrels with a nominal thickness of 26.0 inches and a nominal metal cutting rate of 1.0 inches per minute, uncontrolled, and exhausting outdoors.
 - (4) Metal storage piles.
 - (5) Unpaved roads.

SECTION B GENERAL CONDITIONS

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

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

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

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

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

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

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

B.4 Enforceability

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

B.5 Severability

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

B.6 Property Rights or Exclusive Privilege

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

B.7 Duty to Provide Information

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

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

- (b) The annual notice shall be submitted in the format attached or its equivalent no later than March 1 of each year to:

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

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

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Prior Permits Superseded [326 IAC 2-1.1-9.5]

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

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

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

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

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

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least one hundred twenty (120) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-6.1-4(b), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) The Permittee shall notify the OAQ no later than thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.14 Source Modification Requirement

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

B.15 Inspection and Entry

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

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

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

The application which shall be submitted by the Permittee does require an affirmation that the statements in the application are true and complete by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

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

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

C.3 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

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

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

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

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

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

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

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

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

Corrective Actions and Response Steps

C.12 Response to Excursions or Exceedances

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

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

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

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

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

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

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

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

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

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

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

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

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

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

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the alkaline cleaning process and annealing furnace shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

D.1.2 Nitrogen Oxide Emissions Limitations [326 IAC 10-1]

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

Compliance Determination Requirements

D.1.3 Particulate Control

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, constructed in 2008, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

- (i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven.

This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.

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

These two ovens are heated by a integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour.

The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

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

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

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

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

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

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

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

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

D.2.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the primer curing oven and finish curing oven shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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

D.2.5 PSD Minor Limit and MSOP Status [326 IAC 2-2] [326 IAC 2-6.1]

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

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC)

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

- (a) Pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) the source shall prepare or obtain from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM OAQ reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.
- (b) Thermal Oxidizer
 - (i) Pursuant to 326 IAC 8-1-2(a)(2), the Permittee shall use a thermal oxidizer on the coil coating line, and shall operate the thermal oxidizer within manufacturer's specifications.
 - (ii) Pursuant to 326 IAC 8-1-2(c), the overall efficiency of the thermal oxidizer shall be no less than the equivalent overall efficiency calculated by the following equation:

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

Where:

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

The overall efficiency of the thermal oxidizer shall be greater than or equal to 53% at V = 8.64 lbs/gallon and E = 4.06 lbs/gallon.

D.2.7 Thermal Oxidizer

In order to comply with Condition D.2.5, the Permittee shall operate the thermal oxidizer at all times that the coil coating line is in operation.

D.2.8 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.2, D.2.5 and D.2.6, and as required under NSPS Subpart TT (Section E.1) and to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall perform VOC testing of the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this

condition.

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

D.2.9 Thermal Oxidation

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

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.2, the Permittee shall maintain records of:
 - (1) The amount and VOC content of each coating material and solvent used less water on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) The volume weighted VOC content of the coatings used for each month; and
 - (3) The weight of VOCs emitted for each compliance period.
- (b) To document the compliance status with Condition D.2.9, the Permittee shall maintain continuous temperature records for the thermal oxidizers and the 3-hour block average temperature used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.2.10, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers. The Permittee shall include in its daily record when a pressure or fan amperage reading is not taken and the reason for the lack of pressure or fan amperage reading (e.g., the process did not operate that day).

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

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour that dries the steel strip as it exits the alkaline cleaning process.
 - (2) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour associated with the chemical treatment dip tank.
 - (3) One (1) quench tank hot air dryer, nominally rated at 2.0 MMBtu per hour.
- (e) Welding equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of one (1) lap seam welder that fuses coil ends together to allow continuous line operation.
- (g) One (1) outdoor scrap metal sorting operation, with a nominal metal processing throughput of 40.0 tons per hour, and consisting of the following:
 - (1) Two (2) oxypropane torches, approved for construction in 2013, cutting galvanized pipes and coils with a nominal thickness of 0.0625 inches and a nominal cutting rate of 12.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (2) Four (4) oxypropane torches, approved for construction in 2013, cutting metal plates with a nominal thickness of 4.0 inches and a nominal metal cutting rate of 20.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (3) One (1) oxypropane torch, approved for construction in 2013, cutting mandrels with a nominal thickness of 26.0 inches and a nominal metal cutting rate of 1.0 inches per minute, uncontrolled, and exhausting outdoors.

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

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

D.3.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the alkaline cleaning process hot air dryer, chemical treatment dip tank dryer, quench tank dryer, welding equipment, and oxypropane torches shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, approved for construction in 2006 and constructed in 2008, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

(i) one (1) natural gas-fired curing oven for drying primer coat, identified as Primer Curing Oven.

This Primer Curing Oven is also equipped with low NO_x burners having a nominal heat capacity of 11.6 MMBtu per hour and is used to provide heat for startup and to keep this oven hot during process interruptions.

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

These two ovens are heated by an integral thermal oxidizer fueled by VOC with natural gas available as a supplemental fuel, with a nominal heat input capacity of 60 MMBtu per hour.

The thermal oxidizer utilizes low NO_x burners and is considered an integral part of the process. The integral thermal oxidizer also acts to reduce VOC emissions from the coating line.

The coil coating line exhausts to stack S3.

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

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

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

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

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

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

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

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

- (8) 40 CFR 60.464(c)
- (9) 40 CFR 60.465
- (10) 40 CFR 60.466

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

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

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

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

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

I hereby certify that Steel Dynamics, Inc. is:

still in operation.

no longer in operation.

I hereby certify that Steel Dynamics, Inc. is:

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

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

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

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

Noncompliance:

MALFUNCTION REPORT

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

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

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

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

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

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

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

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

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

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

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

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

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

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

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

326 IAC 1-6-1 Applicability of rule

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

326 IAC 1-2-39 "Malfunction" definition

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

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

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

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

Attachment A

New Source Performance Standards for Metal Coil Surface Coating

40 CFR 60, Subpart TT

Title 40: Protection of Environment

PART 60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES

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Subpart TT—Standards of Performance for Metal Coil Surface Coating

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

§ 60.460 Applicability and designation of affected facility.

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

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

§ 60.461 Definitions.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

§ 60.462 Standards for volatile organic compounds.

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

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

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

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

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

§ 60.463 Performance test and compliance provisions.

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

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

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

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

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

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

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

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

where

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

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

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

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

Where:

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

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

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

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

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

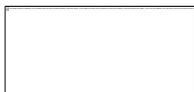
(iv) If each individual coating used by an affected facility has a VOC content, as received, that is equal to or less than 0.28 kg/ l of coating solids, the affected facility is in compliance provided no VOC's are added to the coatings during distribution or application.

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

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

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

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



Equation 5

Where:

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

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

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



Equation 6

Where:

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

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

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

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



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

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

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



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

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

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

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

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

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

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

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

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

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

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

Where:

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

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

Where:

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

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

Where:

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

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

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

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

Where:

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

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

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

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

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

Equation 17

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

or

whichever is greater.

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

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

§ 60.464 Monitoring of emissions and operations.

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

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

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

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

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

§ 60.465 Reporting and recordkeeping requirements.

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

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

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

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

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

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

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

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

§ 60.466 Test methods and procedures.

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

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

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

(3) Method 1 for sample and velocity traverses;

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

(5) Method 3 for gas analysis; and

(6) Method 4 for stack gas moisture.

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

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

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

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

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

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

Source Description and Location

Source Name: Steel Dynamics, Inc.
Source Location: 5134 Loop Road, Jeffersonville, Indiana 47130
County: Clark
SIC Code: 3479 (Coating, Engraving, and Allied Services, Not Elsewhere Classified)
Operation Permit No.: 019-30060-00089
Operation Permit Issuance Date: December 15th, 2011
Minor Permit Revision No.: 019-33061-00089
Permit Reviewer: Brian Williams

On April 9th, 2013, the Office of Air Quality (OAQ) received an application from Steel Dynamics, Inc. related to a modification to an existing stationary steel coil coating facility.

Existing Approvals

The source was issued MSOP Renewal No. 019-30060-00089 on December 15th, 2011.

County Attainment Status

The source is located in Clark County.

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

¹Attainment effective October 23, 2001, for the 1-hour ozone standard for the Louisville area, including Clark County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standard (NAAQS) for purposes of 40 CFR Part 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

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

- (b) **PM_{2.5}**
Clark County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM_{2.5} emissions. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
Clark County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) 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.

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Status of the Existing Source

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

This PTE table is from the TSD of MSOP Renewal No. 019-30060-00089, issued on December 15th, 2011.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NOx	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Alkaline Cleaning Process	8.00	13.40	13.40	-	-	-	-	-	-	-
Surface Coating	-	-	-	-	-	-	43.55	-	9.57	4.56 1-2-4 Trimethyl- benzene
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.2	58.04	3.80	82,944	1.30	-
Welding	0.11	0.11	0.11	-	-	-	-	-	0.01	-
Surface Chemical Treatment Dip Tank	-	-	-	-	-	-	-	-	-	-
Total PTE of Entire Source	9.42	18.77	17.45	0.41	37.19	58.04	47.35	82,944	10.88	4.56
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Steel Dynamics, Inc. on April 9th, 2013, relating to the addition of a small scrap metal sorting operation. This operation will consist of torch cutting of scrap metal, material handling, and unpaved roads. Due to the addition of this operation, the source has requested to remove the existing PM limit on the alkaline cleaning process, which limited emissions to less than 10 tons per year and rendered the requirements of 326 IAC 6.5 not applicable. As a result, the source will now be subject to the requirements of 326 IAC 6.5 (Particulate Matter Limitations Except Lake County) instead of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes).

The following is a list of the new emission units:

- (a) One (1) outdoor scrap metal sorting operation, with a nominal metal processing throughput of 40.0 tons per hour, and consisting of the following:
 - (1) Two (2) oxypropane torches, approved for construction in 2013, cutting galvanized pipes and coils with a nominal thickness of 0.0625 inches and a nominal cutting rate of 12.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (2) Four (4) oxypropane torches, approved for construction in 2013, cutting metal plates with a nominal thickness of 4.0 inches and a nominal metal cutting rate of 20.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (3) One (1) oxypropane torch, approved for construction in 2013, cutting mandrels with a nominal thickness of 26.0 inches and a nominal metal cutting rate of 1.0 inches per minute, uncontrolled, and exhausting outdoors.
 - (4) Metal storage piles.
 - (5) Unpaved roads.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

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

Process/ Emission Unit	PTE of Proposed Revision (tons/year)									
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Torch Cutting	7.44	7.44	7.44	0	0	0	0	0	0.04	0.02, Manganese
Material Handling & Processing	0.29	0.14	0.02	0	0	0	0	0	0	0
Unpaved Roads	1.58	0.40	0.40	0	0	0	0	0	0	0
Total PTE of Proposed Revision	9.32	7.98	7.87	0	0	0	0	0	0.04	0.02

Pursuant to 326 IAC 2-6.1-6(g)(3), this MSOP is revised through Minor Permit Revision because the proposed revision involves the construction of new emission units with a potential to emit less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either PM, PM10, or direct PM2.5.

PTE of the Entire Source After Issuance of the MSOP Revision

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

Process/ Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Alkaline Cleaning Process***	8.00 13.40	13.40	13.40	-	-	-	-	-	-	-
Surface Coating****	-	-	-	-	-	-	43.55	-	9.57	4.56 1-2-4 Trimethyl- benzene
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.2	58.04	3.80	82,944	1.30	-
Welding	0.11	0.11	0.11	-	-	-	-	-	0.01	-
Surface Chemical Treatment Dip Tank*****	-	-	-	-	-	-	-	-	-	-
Torch Cutting	7.73	7.73	7.73	-	-	-	-	-	0.04	0.02, Manganese
Material Handling & Processing	0.29	0.14	0.02	-	-	-	-	-	-	-
Unpaved Roads	1.58	0.40	0.40	-	-	-	-	-	-	-
Total PTE of Entire Source	9.42 24.43	18.77 27.04	17.45 25.61	0.41	37.19	58.04	47.35	82,944	10.88 10.92	4.56
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA

negl. = negligible

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

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

*** Due to this revision the source has requested to remove the existing PM limit on the alkaline cleaning process, which limited emissions to less than 10 tons per year and rendered the requirements of 326 IAC 6.5 not applicable.

**** PTE after the integral thermal oxidizer.

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

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (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 Revision (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Alkaline Cleaning Process***	13.40	13.40	13.40	-	-	-	-	-	-	-
Surface Coating****	-	-	-	-	-	-	43.55	-	9.57	4.56 1-2-4 Trimethyl- benzene
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.2	58.04	3.80	82,944	1.30	-
Welding	0.11	0.11	0.11	-	-	-	-	-	0.01	-
Surface Chemical Treatment Dip Tank*****	-	-	-	-	-	-	-	-	-	-
Torch Cutting	7.73	7.73	7.73	-	-	-	-	-	0.04	0.02, Manganese
Material Handling & Processing	0.29	0.14	0.02	-	-	-	-	-	-	-
Unpaved Roads	1.58	0.40	0.40	-	-	-	-	-	-	-
Total PTE of Entire Source	24.43	27.04	25.61	0.41	37.19	58.04	47.35	82,944	10.92	4.56
Title V Major Source Thresholds**	NA	100	100	100	100	100	100	100,000	25	10
PSD Major Source Thresholds**	250	250	NA	250	250	250	250	100,000	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	NA	NA	100	NA	NA	NA	NA	NA	NA	NA
negl. = negligible *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". ** The 100,000 CO ₂ e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD. *** Due to this revision the source has requested to remove the existing PM limit on the alkaline cleaning process, which limited emissions to less than 10 tons per year and rendered the requirements of 326 IAC 6.5 not applicable. **** PTE after the integral thermal oxidizer. ***** No particulate is formed in this process and the solution does not contain VOC.										

MSOP Status

- (a) This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).
- (b) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit of any single HAP will still be less than ten (10) tons per year and the PTE of a combination of HAPs will still be less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.
- (c) This revision will not change the minor status of the source, because the uncontrolled/unlimited potential to emit greenhouse gases (GHGs) will still be less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

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

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-1.1-5 (Nonattainment New Source Review)
This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM_{2.5} from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the new process is 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.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
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:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) 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.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Due to this revision, the source is subject to the requirements of 326 IAC 6-4, because the material handling and processing and unpaved roads have the potential to emit fugitive particulate emissions. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
The source is not subject to the requirements of 326 IAC 6-5, because the material handling and processing and unpaved roads do not have potential fugitive particulate emissions greater than 25 tons per year.
- (i) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
This rule applies to sources or facilities with a potential to emit particulate matter located in the counties of Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo, or Wayne that are specifically listed in 326 IAC 6.5-2 through 6.5-10 or sources located in the above mentioned counties with either the potential to emit one hundred (100) tons or more or actual emissions of ten (10) tons or more. This source is located in Clark County, is not specifically listed in 326 IAC 6.5-6 and has an unlimited potential to emit 24.43 tons of PM per year. Therefore, this source is subject to the requirements of 326 IAC 6.5 because the actual PM emissions from the source are not limited to less than 10 tons per year.
- Note: Due to this revision the source requested to remove the existing PM emission limit for the alkaline cleaning process, which limited emissions to less than 10 tons per year and rendered the requirements of 326 IAC 6.5 not applicable.
- (j) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (k) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD.

Hot Dip Galvanizing Line - Alkaline Cleaning Process

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are no longer applicable to the alkaline cleaning process because it is subject to more stringent particulate matter limits under 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the alkaline cleaning process 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 demister shall be in operation at all times the alkaline cleaning process is in operation, in order to comply with this limit.

Note: Due to this revision, this is a new requirement.

Hot Dip Galvanizing Line - Annealing Furnaces

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The four-section annealing furnace is not subject to this rule because there are no process emissions from this furnace.
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the four-section annealing furnace 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)).

Note: Due to this revision, this is a new requirement.

Coil Coating Line - Surface Coating

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(b)(6), the requirements of 326 IAC 6-3-2 are not applicable to the coil coating line because the coatings applied to the steel coil are applied using a roll coating method (100% transfer efficiency).
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-1(c)(2), particulate limitations shall not be established for surface coating process that use roll coating. Therefore, the requirements of 326 IAC 6.5-1-2 are not applicable to the coil coating line because the coatings applied to the steel coil are applied using a roll coating method (100% transfer efficiency).

Coil Coating Line - Curing Ovens

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The curing ovens are not subject to this rule because there are no process emissions from these natural gas combustion units.
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the primer curing oven and finish curing oven 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)), each.

Note: Due to this revision, this is a new requirement.

Natural Gas Combustion Units

- (a) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
The hot air dryers associated with the alkaline cleaning process, chemical treatment dip tank, and quench tank are not subject to this rule because there are no process emissions from these natural gas combustion units.
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the alkaline cleaning process hot air dryer, chemical treatment dip tank dryer, and quench tank dryer 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)), each.

Note: Due to this revision, this is a new requirement.

Welding

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the welding equipment because it is subject to more stringent particulate matter limits under 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the welding equipment 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)).

Note: Due to this revision, this is a new requirement.

Surface Chemical Treatment Dip Tank

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the surface chemical treatment dip tank because it does not have the potential to emit particulate matter.
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
The requirements of 326 IAC 6.5 are not applicable to the surface chemical treatment dip tank because it does not have the potential to emit particulate matter.

Torch Cutting

- (a) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the torch cutting equipment associated with the outdoor metal scrap sorting operation because it is subject to more stringent particulate matter limits under 326 IAC 6.5 (Particulate Matter Limitations Except Lake County).
- (b) 326 IAC 6.5 (Particulate Matter Limitations Except Lake County)
Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the torch cutting equipment 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)), each.

Note: Due to this revision, this is a new requirement.

- (c) 326 IAC 8 (Volatile Organic Compound Rules)
There are no 326 IAC 8 Rules applicable to the torch cutting equipment because this equipment does not have the potential to emit VOC.

Compliance Determination, Monitoring and Testing Requirements

Pursuant to 326 IAC 6.5-1-4(a), IDEM has determined that performance testing is not required for the hot dip galvanizing line annealing furnaces, coil coating line curing ovens, natural gas combustion units, welding operations, and torch cutting operations to demonstrate compliance with the applicable particulate matter emission limits under 326 IAC 6.5-1-2(a) (Particulate Matter Limitations Except Lake County).

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP Renewal No. 019-30060-00089, issued on December 15th, 2011.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strike through~~ text and new language appears as **bold** text:
- (1) Section A.2 has been revised to include descriptive information for the new outdoor scrap metal sorting operation.
 - (2) The existing PM emission limit in Condition D.1.1 has been removed and replaced with the applicable requirements of 326 IAC 6.5-1-2.
 - (3) The source is no longer subject to the requirements of 326 IAC 6-3-2. Therefore, Condition D.1.3 has been removed from the permit.
 - (4) Section D.1 - Particulate Control has been revised to reflect that the demister must operate in order to comply with the requirements of 326 IAC 6.5-1-2.
 - (5) Section D.2 has been revised to include a new condition with the applicable requirements of 326 IAC 6.5-1-2 for the curing ovens. Due to the addition of this new requirement Conditions D.2.3 through D.2.9 have been revised as necessary.
 - (6) The permit has been revised to include a new Section D.3, which includes applicable requirements for the natural gas combustion units, welding, and oxypropane torches.

...
A.2 Emission Units and Pollution Control Equipment Summary

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

- ...
- (g) **One (1) outdoor scrap metal sorting operation, with a nominal metal processing throughput of 40.0 tons per hour, and consisting of the following:**
- (1) **Two (2) oxypropane torches, approved for construction in 2013, cutting galvanized pipes and coils with a nominal thickness of 0.0625 inches and a nominal cutting rate of 12.0 inches per minute, each, uncontrolled, and exhausting outdoors.**
 - (2) **Four (4) oxypropane torches, approved for construction in 2013, cutting metal plates with a nominal thickness of 4.0 inches and a nominal metal cutting rate of 20.0 inches per minute, each, uncontrolled, and exhausting outdoors.**
 - (3) **One (1) oxypropane torch, approved for construction in 2013, cutting mandrels with a nominal thickness of 26.0 inches and a nominal metal cutting rate of 1.0 inches per minute, uncontrolled, and exhausting outdoors.**

(4) Metal storage piles.

(5) Unpaved roads.

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

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

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

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

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the alkaline cleaning process and annealing furnace shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

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

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

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

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

D.1.32 Nitrogen Oxide Emissions Limitations [326 IAC 10-1]

...

Compliance Determination Requirements

D.1.43 Particulate Control

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

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

...

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

...

D.2.3 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the primer curing oven and finish curing oven shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

D.2.34 Preventive Maintenance Plan [326 IAC 1-6-3]

...

D.2.45 PSD Minor Limit and MSOP Status [326 IAC 2-2] [326 IAC 2-6.1]

...

Compliance Determination Requirements

D.2.56 Volatile Organic Compounds (VOC)

...

D.2.67 Thermal Oxidizer

In order to comply with Condition D.2.45, the Permittee shall operate the thermal oxidizer at all times that the coil coating line is in operation.

D.2.78 Testing Requirements [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.2, D.2.45 and D.2.56, and as required under NSPS Subpart TT (Section E.1) and to render 326 IAC 2-2 (PSD) not applicable, the Permittee shall perform VOC testing of the thermal oxidizer utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

Compliance Monitoring Requirements ~~[326 IAC 2-5.1-3(a)(2)]~~ [326 IAC 2-6.1-5(4a)(2)]

D.2.89 Thermal Oxidation

...

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

D.2.910 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.52, the Permittee shall maintain records of:

...

(b) To document the compliance status with Condition D.2.89, the Permittee shall maintain continuous temperature records for the thermal oxidizers and the 3-hour block average temperature used to demonstrate compliance during the most recent compliant stack test. The Permittee shall include in its daily record when a temperature reading is not taken and the reason for the lack of temperature reading (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.2.89, the Permittee shall maintain daily records of the duct pressure or fan amperage for the thermal oxidizers. The Permittee shall include in its daily record when a pressure or fan amperage reading is not taken and the reason for the lack of pressure or fan amperage reading (e.g., the process did not operate that day).

...

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour, consisting of:
 - (1) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour that dries the steel strip as it exits the alkaline cleaning process.
 - (2) One (1) natural gas-fired hot air dryer nominally rated at 2.0 MMBtu per hour associated with the chemical treatment dip tank.
 - (3) One (1) quench tank hot air dryer, nominally rated at 2.0 MMBtu per hour.
- (e) Welding equipment related to manufacturing activities not resulting in the emission of HAPs, consisting of one (1) lap seam welder that fuses coil ends together to allow continuous line operation.
- (g) One (1) outdoor scrap metal sorting operation, with a nominal metal processing throughput of 40.0 tons per hour, and consisting of the following:
 - (1) Two (2) oxypropane torches, approved for construction in 2013, cutting galvanized pipes and coils with a nominal thickness of 0.0625 inches and a nominal cutting rate of 12.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (2) Four (4) oxypropane torches, approved for construction in 2013, cutting metal plates with a nominal thickness of 4.0 inches and a nominal metal cutting rate of 20.0 inches per minute, each, uncontrolled, and exhausting outdoors.
 - (3) One (1) oxypropane torch, approved for construction in 2013, cutting mandrels with a nominal thickness of 26.0 inches and a nominal metal cutting rate of 1.0 inches per minute, uncontrolled, and exhausting outdoors.

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

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

D.3.1 Particulate Matter Limitations Except Lake County [326 IAC 6.5]

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the alkaline cleaning process hot air dryer, chemical treatment dip tank dryer, quench tank dryer, welding equipment, and oxypropane torches shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf), each.

...

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

- (1) IDEM has revised the emission unit description for the coil coating line in Sections A.2, D.2, and E.1 to include the year the unit was approved for construction and the actual year of construction.
- (2) IDEM has revised Sections D.2 - Nitrogen Oxide Control Requirement (BACT) and Volatile Organic Compounds (VOC) Compliance Determination Requirements to correct typographical errors.

...
A.2 Emission Units and Pollution Control Equipment Summary

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

- ...
- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, **approved for construction in 2006 and constructed in 2008**, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

...
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, **approved for construction in 2006 and constructed in 2008**, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

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

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

...
D.2.56 Volatile Organic Compounds (VOC)

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

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

...
SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) coil coating line for applying primer and finish coats to both sides of steel coil in one pass, **approved for construction in 2006 and constructed in 2008**, with a nominal coating capacity of 600 linear feet of coil per minute, using rolling application methods, consisting of:

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on April 9th, 2013. Additional information was received on April 15th, 2013 and April 24th, 2013.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Permit Revision No. 019-33061-00089. The staff recommends to the Commissioner that this MSOP Minor Permit Revision 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 IGCN 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.in.gov/idem

**Appendix A: Emission Calculations
Potential To Emit Summary of Revision**

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

Potential to Emit Before Controls (tons/year)										
Process	PM	PM10	PM2.5	SO₂	NOx	CO	VOC	GHG	Single HAP	Combination HAPs
Torch Cutting	7.44	7.44	7.44	0	0	0	0	0	0.02	0.04
Material Handling & Processing	0.29	0.14	0.02	0	0	0	0	0	0	0
Unpaved Roads	1.58	0.40	0.40	0	0	0	0	0	0	0
Total	9.32	7.98	7.87	0	0	0	0	0	0.02	0.04

**Appendix A: Emission Calculations
Potential To Emit Summary**

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

Potential to Emit Before Controls (tons/year)										
Process	PM	PM10	PM2.5	SO ₂	NOx	CO	VOC	GHG	Single HAP	Combination HAPs
Alkaline Cleaning Process	13.40	13.40	13.40	0.00	0.00	0.00	0.00		0.00	0.00
Surface Coating*	0.00	0.00	0.00	0.00	0.00	0.00	43.55		4.56	9.57
Natural Gas Combustion	1.31	5.25	3.94	0.41	37.19	58.04	3.80	82,944	1.24	1.30
Welder	0.11	0.11	0.11	0.00	0.00	0.00	0.00		0.01	0.01
Surface Chemical Treatment Dip Tank**	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00	0.00
Torch Cutting	7.44	7.44	7.44	0.00	0.00	0.00	0.00		0.02	0.04
Material Handling & Processing	0.29	0.14	0.02	0.00	0.00	0.00	0.00		0.00	0.00
Unpaved Roads	1.58	0.40	0.40	0.00	0.00	0.00	0.00		0.00	0.00
Total	24.14	26.75	25.32	0.41	37.19	58.04	47.35	82,944	4.56	10.91

* PTE for surface coating is after the integral oxidizer.

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

Note: The greatest single HAP emitted by the surface coating is 1-2-4 trimethylbenzene, the greatest single HAP emitted by combustion is hexane, and the greatest single HAP emitted by flame cutting is manganese/chromium.

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

Company Name: Steel Dynamics, Inc.

Address: 5134 Loop Road, Jeffersonville, Indiana 47130

Permit Number: 019-33061-00089

Permit Reviewer: Brian Williams

Date: April 9, 2013

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

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

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

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

*** PTE is after the integral Oxidizer

METHODOLOGY

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

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

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

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

PM = PM10 = PM2.5

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

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

Company Name: Steel Dynamics, Inc.

Address: 5134 Loop Road, Jeffersonville, Indiana 47130

Permit Number: 019-33061-00089

Permit Reviewer: Brian Williams

Date: April 9, 2013

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

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

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

METHODOLOGY

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

Appendix A: Emission Calculations
Particulate Emissions From Alkaline Cleaning Process on Hot Dip Galvanizing Line

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

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

Assume all PM emissions equal PM10 emissions.

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

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

Methodology

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

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

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

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

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

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

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

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

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

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

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

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03.

(AP-42 Supplement D 7/98)

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Methodology

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Greenhouse Gas Emissions

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

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

Methodology

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

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

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

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

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

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

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

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

Assume all PM emissions are equal to PM10.

Emission factors are from AP 42, Chapter 12.19, Electric Arc Welding, Tables 12.19-1 and 12.19-2 (1/95).

Methodology

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

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

Appendix A: Emissions Calculations
Torch Cutting

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

PROCESS	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	
Torch Cutting												
Oxypropane (galv pipe & coils)	2	0.0625	12.00	0.0815	0.0002		0.0002	0.007	0.0000	0.00	0.0000	0.0000
Oxypropane (plate)	4	4.00	20.00	0.0815	0.0002		0.0002	1.56	0.0038	0.00	0.0038	0.0077
Oxypropane (mandrels)	1	26.00	1.00	0.0815	0.0002		0.0002	0.13	0.0003	0.00	0.0003	0.0006
EMISSION TOTALS												
Potential Emissions lbs/hr								1.70	0.004	0.00	0.004	0.01
Potential Emissions lbs/day								40.78	0.10	0.00	0.10	0.20
Potential Emissions tons/year								7.44	0.02	0.00	0.02	0.04

Methodology:

As with any scrap torch cutting operation, metal thickness and metal cutting rate will vary; the source has attempted to reflect the worst case scenario (max metal thickness and associated cutting rate) in determining the potential to emit.

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
Material Processing and Handling**

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^{1.3} \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: E_f = Emission factor (lb/ton)

- k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter $\leq 100 \mu\text{m}$)
- k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter $\leq 10 \mu\text{m}$)
- k (PM2.5) = 0.053 = particle size multiplier (0.053 assumed for aerodynamic diameter $\leq 2.5 \mu\text{m}$)
- U = 10.2 = worst case annual mean wind speed (Source: NOAA, 2006*)
- M = 11.0 = material % moisture content of aggregate (Source: AP-42 Section 11.1.1.1)
- E_f (PM) = 5.50E-04 lb PM/ton of material handled
- E_f (PM10) = 2.60E-04 lb PM10/ton of material handled
- E_f (PM2.5) = 3.94E-05 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 40 tons/hr
 Maximum Material Handling Throughput = 350,400 tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)	Unlimited/Uncontrolled PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	0.10	0.05	0.01
Material Transfer	0.10	0.05	0.01
Loading of material into trucks	0.10	0.05	0.01
Total (tons/yr)	0.29	0.14	0.02

Methodology

Maximum Material Handling Throughput (tons/yr) = Maximum Material Handling Throughput (tons/hr) * 8,760 (hr/yr)
 Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
 *Worst case annual mean wind speed (Indianapolis, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2006

Abbreviations

- PM = Particulate Matter
- PM10 = Particulate Matter (<10 μm)
- PM2.5 = Particulate matter (< 2.5 μm)
- PTE = Potential to Emit

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Steel Dynamics, Inc.
Address: 5134 Loop Road, Jeffersonville, Indiana 47130
Permit Number: 019-33061-00089
Permit Reviewer: Brian Williams
Date: April 9, 2013

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006)

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	22.0	1.0	22.0	40.0	880.0	240	0.045	1.0	365.0
Vehicle (leaving plant) (one-way trip)	18.0	1.0	18.0	17.5	315.0	240	0.045	0.8	298.6
Total			40.0		1195.0			1.8	663.6

Average Vehicle Weight Per Trip = tons/trip
 Average Miles Per Trip = miles/trip

Unmitigated Emission Factor, $E_f = k * [(s/12)^a] * [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	29.9	29.9	29.9	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$ (Equation 2 from AP-42 13.2)

Mitigated Emission Factor, $E_{ext} = E * [(365 - P)/365]$

where P = days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	7.26	1.85	1.85	lb/mile
Mitigated Emission Factor, $E_{ext} =$	4.77	1.22	1.22	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.32	0.34	0.34	0.87	0.22	0.22
Vehicle (leaving plant) (one-way trip)	1.08	0.28	0.28	0.71	0.18	0.18
	2.41	0.61	0.61	1.58	0.40	0.40

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

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

TO: Barry Smith
Steel Dynamics, Inc. (SDI)
4500 CR 59
Butler, IN 46721

DATE: May 22, 2013

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

SUBJECT: Final Decision
Minor Permit Revision
019-33061-00089

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

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

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

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

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	GHOTOPP 5/22/2013 Steel Dynamics, Inc. (SDI) 019-33061-00089 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Barry Smith Steel Dynamics, Inc. (SDI) 4500 CR 59 Butler IN 46721 (Source CAATS) via confirmed delivery										
2		Ms. Rhonda England 17213 Persimmon Run Rd Borden IN 47106-8604 (Affected Party)										
3		Ms. Betty Hislip 602 Dartmouth Drive, Apt 8 Clarksville IN 47129 (Affected Party)										
4		Mrs. Sandy Banet 514 Haddox Rd Henryville IN 47126 (Affected Party)										
5		Jeffersonville City Council and Mayors Office 500 Quarter Master Jeffersonville IN 47130 (Local Official)										
6		Mr. Robert Bottom Paddlewheel Alliance P.O. Box 35531 Louisville KY 40232-5531 (Affected Party)										
7		Clark County Board of Commissioners 501 E. Court Avenue Jeffersonville IN 47130 (Local Official)										
8		Mr. David Hatchett Hatchett & Hauck 111 Monument Circle Suite 301 Indianapolis IN 46204 (Attorney)										
9		Clark County Health Department 1320 Duncan Avenue Jeffersonville IN 47130-3723 (Health Department)										
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