INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Carol S. Comer**
*Commissioner*

# NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a Significant Source Modification to a Part 70 Operating Permit and the Renewal of a Part 70 Operating Permit

for Industrial Steel Construction, Inc. in Lake County

Part 70 Operating Permit Renewal No. T089-36385-00161
Significant Source Modification No. 089-36435-00161

The Indiana Department of Environmental Management (IDEM) has received an application from Industrial Steel Construction, Inc., located at 86 North Bridge Street, Gary, Indiana, for a significant source modification and renewal of its Part 70 Operating Permit issued on July 7, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Industrial Steel Construction, Inc. to make certain changes at its existing source. Industrial Steel Construction, Inc. has applied to construct one (1) metalizing booth, one (1) paint booth, and one (1) hand blasting operation.

The applicant intends to construct and operate new equipment that will emit air pollutants; therefore, the permit contains new or different permit conditions. In addition, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g. changes that add or modify synthetic minor emission limits). IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow the applicant to make this change.

A copy of the permit application and IDEM's preliminary findings are available at:

Gary Public Library - Brunswick Branch
4030 West 5th Avenue
Gary, Indiana 46402

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/.

**How can you participate in this process?**

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an

opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T089-36385-00161 and SSM089-36435-00161 in all correspondence.

**Comments should be sent to:**

Donald McQuigg
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-4240
Or dial directly: (317) 234-4240
Fax: (317) 232-6749 attn: Donald McQuigg
E-mail: dmcquigg@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

**What will happen after IDEM makes a decision?**

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Donald McQuigg of my staff at the above address.

Nathan Bell, Section Chief
Permits Branch
Office of Air Quality

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*Commissioner*

**DRAFT**

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

Re: 089-36435-00161
Significant Source Modification

Dear Mr. Daniel E. Moore:

Industrial Steel Construction, Inc. was issued Part 70 Operating Permit Renewal No. T089-29933-00161 on July 11, 2011 for a stationary miscellaneous metal working and bridge beam fabrication source located at 86 North Bridge Street, Gary, Indiana. An application to modify the source was received on October 14, 2015. Pursuant to the provisions of 326 IAC 2-7-10.5, a Significant Source Modification is hereby approved as described in the attached Technical Support Document.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

(a) One (1) metalizing booth, identified as EU#26, approved in 2016 for construction, with a maximum capacity of 10,220,000 $ft^2$ metal coated/year and a maximum wire usage of 5,110,000 pounds wire/year, using Baghouse #26 for particulate control, and exhausting through Stack # 26;

(b) One (1) paint booth, identified as EU#25, approved in 2016 for construction, equipped with HVLP and/or airless applicators, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors; and

(c) One (1) hand blasting operation, identified as EU#24, approved in 2016 for construction, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors.

The following construction conditions are applicable to the proposed modification:

General Construction Conditions

1. 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.

Effective Date of the Permit

3. Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

**DRAFT**

Commenced Construction

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(j), 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.

Approval to Construct and Operate

6. Pursuant to 326 IAC 2-7-10.5(h)(2), this Significant Source Modification authorizes the construction of the new emission units, when the Significant Source Modification has been issued.

   Pursuant to 326 IAC 2-7-10.5(m), the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

   Pursuant to 326 IAC 2-7-12, operation of the new emission units is not approved until the Significant Permit Modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a Significant Permit Modification in accordance with 326 IAC 2-7-10.5(m)(2) and 326 IAC 2-7-12 (Permit Modification).

   For the purposes of this permitting action, the Significant Permit Modification has been combined with the current Part 70 Operating Permit Renewal. Therefore, operation is not approved until the Part 70 Operating Permit Renewal has been issued.

A copy of the permit is available on the Internet at: http://www.in.gov/ai/appfiles/idem-caats/. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

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 Donald McQuigg of my staff, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Donald McQuigg or extension 4-4240 or dial (317) 234-4240.

Sincerely,

Nathan C. Bell, Section Chief
Permits Branch
Office of Air Quality

Attachments: Significant Source Modification, Technical Support Document, and Emission Calculations

cc: File - Lake County
Lake County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch
IDEM Northwest Regional Office

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*Commissioner*

DRAFT

# Significant Source Modification

# to a Part 70 Source

# OFFICE OF AIR QUALITY

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
This permit also addresses certain new source review requirements for new and/or existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions.

| Significant Source Modification No.: 089-36435-00161 | |
|---|---|
| Issued by:<br><br>Nathan C. Bell, Section Chief<br>Permits Branch<br>Office of Air Quality | Issuance Date: |

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Attachment B: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

## SECTION A SOURCE SUMMARY

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

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

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

| | |
|---|---|
| Source Address: | 86 North Bridge Street, Gary, Indiana 46404 |
| General Source Phone Number: | (219) 885-7600 |
| SIC Code: | 3441 (Fabricated Structural Metal)<br>3449 (Miscellaneous Structural Metal Work) |
| County Location: | Lake |
| Source Location Status: | Nonattainment for 8-hour ozone standard<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Operating Permit Program<br>Minor Source, under PSD and Emission Offset Rules<br>Minor Source, Section 112 of the Clean Air Act<br>Not 1 of 28 Source Categories |

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

**#1 Blaster Conveyor Line**

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, constructed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #1 is considered an existing affected source.

**Annex**

(b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, constructed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #2 is considered an existing affected source.

**Girder Shop**

(c) One (1) paint booth, identified as EU #15, constructed in 1997, exhausting to general ventilation and using no emission control devices;

(d) Electric arc stick welding, identified as EU #9, constructed in 2001, with a maximum capacity of 2.477 pounds of rods per minute; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #9 is considered an existing affected source.

(e) OxyAcetylene/Methane Cutting, including forty-seven (47) torches exhausting inside the building, collectively identified as EU #13, constructed in 1998, with a total of forty-seven (47) torches operational; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #13 is considered an existing affected source.

(f) One (1) blaster #3, identified as EU #18, constructed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #18 is considered an existing affected source.

(g) One (1) mechanical blaster #5, identified as EU #21, constructed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 21. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #21 is considered an existing affected source.

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

(i) Submerged arc welding identified as EU #17, constructed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #17 is considered an existing affected source.

**Grinding**

(j) One (1) plate sweep grinder, identified as part of EU #11, constructed in 1990, with a maximum capacity of 75 square feet of steel per hour; [40 CFR 63, Subpart XXXXXX]

(k) Three (3) slab grinders, identified as part of EU #11, constructed in 1991, with a maximum capacity of 613,200 tons of slabs per year total; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #11 is considered an existing affected source.

**Bay #8 West**

(l) One (1) mechanical blaster #6, identified as EU #23, constructed in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #23 is considered a new affected source.

**Building A**

(m) One (1) metalizing booth, identified as EU #26, approved in 2016 for construction, with a maximum capacity of 10,220,000 $ft^2$ metal coated/year and a maximum wire usage of 5,110,000 pounds wire/year, using Baghouse #26 for particulate control, and exhausting through Stack # 26;

**Bay #10**

(n) One (1) paint booth, identified as EU #25, approved in 2016 for construction, equipped with HVLP and/or airless applicators, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors; and

(o) One (1) hand blasting operation, identified as EU #24, approved in 2016 for construction, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #24 is considered a new affected source.

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

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

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

(1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, constructed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2(b)(3)]

(2) Sixty-one (61) space heaters, identified as EU #8, rated at 14.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(3) Four (4) natural gas-fired preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(4) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(5) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total. [326 IAC 8-3-2] [326 IAC 8-3-8]

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2(a)]

(d) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2(a)]

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

(f) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(g) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [40 CFR 63, Subpart CCCCCC]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

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

(a) This permit, T089-36385-00161, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

(a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

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

The Permittee shall implement the PMPs.

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

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

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

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

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

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

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

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

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T089-36385-00161 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit.
[326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

(b) A timely renewal application is one that is:

(1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

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

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

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

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

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

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

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

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

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

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

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

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

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

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

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

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

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

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

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

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

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

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall

preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

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

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Licensed Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

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

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

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

**Compliance Requirements [326 IAC 2-1.1-11]**

C.7 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

(a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.

(b) For existing units:
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 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, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

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

(c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality

assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

C.9 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

C.10 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

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

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

C.12 Response to Excursions or Exceedances [40 CFR 64][326 IAC 3-8][326 IAC 2-7-5] [326 IAC 2-7-6]

(I) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.

(II)

(a) CAM *Response to excursions or exceedances.*

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

(2) Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

(b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

(c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

(d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).

(e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.

(f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:

(1) Failed to address the cause of the control device performance problems; or

(2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

(g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.

(h) *CAM recordkeeping requirements.*

(1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

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

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.14 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:

(1) starting in 2004 and every three (3) years thereafter, and

(2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

(b) The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

(AA) All calibration and maintenance records.
(BB) All original strip chart recordings for continuous monitoring instrumentation.
(CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

(AA) The date, place, as defined in this permit, and time of sampling or measurements.
(BB) The dates analyses were performed.
(CC) The company or entity that performed the analyses.
(DD) The analytical techniques or methods used.
(EE) The results of such analyses.
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner

makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [40 CFR 64][326 IAC 3-8]

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

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

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

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

(2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and

(3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

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

(b) The address for report submittal is:

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

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

**Stratospheric Ozone Protection**

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

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

**SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS**

**Emissions Unit Description:**

**#1 Blaster Conveyor Line**

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, constructed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #1 is considered an existing affected source.

**Annex**

(b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, constructed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #2 is considered an existing affected source.

**Girder Shop**

(d) Electric arc stick welding, identified as EU #9, constructed in 2001, with a maximum capacity of 2.477 pounds of rods per minute; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #9 is considered an existing affected source.

(e) OxyAcetylene/Methane Cutting, including forty-seven (47) torches exhausting inside the building, collectively identified as EU #13, constructed in 1998, with a total of forty-seven (47) torches operational; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #13 is considered an existing affected source.

(f) One (1) blaster #3, identified as EU #18, constructed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #18 is considered an existing affected source.

(g) One (1) mechanical blaster #5, identified as EU #21, constructed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 21. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #21 is considered an existing affected source.

(i) Submerged arc welding identified as EU #17, constructed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #17 is considered an existing affected source.

**Grinding**

(j) One (1) plate sweep grinder, identified as part of EU #11, constructed in 1990, with a maximum capacity of 75 square feet of steel per hour; [40 CFR 63, Subpart XXXXXX]

(k) Three (3) slab grinders, identified as part of EU #11, constructed in 1991, with a maximum capacity of 613,200 tons of slabs per year total; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #11 is considered an existing affected source.

**Bay #8 West**

(l) One (1) mechanical blaster #6, identified as EU #23, constructed in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #23 is considered a new affected source.

**Building A**

(m) One (1) metalizing booth, identified as EU #26, approved in 2016 for construction, with a maximum capacity of 10,220,000 $ft^2$ metal coated/year and a maximum wire usage of 5,110,000 pounds wire/year, using Baghouse #26 for particulate control, and exhausting through Stack # 26; and

**Bay #10**

(o) One (1) hand blasting operation, identified as EU #24, approved in 2016 for construction, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #24 is considered a new affected source.

(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 2-7-5(1)]**

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

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

(a) The PM, $PM_{10}$, and $PM_{2.5}$ emissions from the following processes shall not exceed the emission limits listed in the table below:

| Process | Baghouse ID | PM Emission Limit (lbs/hr) | $PM_{10}$ Emission Limit (lbs/hr) | $PM_{2.5}$ Emission Limit (lbs/hr) |
|---|---|---|---|---|
| Mechanical Blaster #1 (EU #1) | Baghouse #1 | 1.75 | 1.75 | 1.75 |
| Mechanical Blaster #4 (EU#2) | Baghouse #2 | 0.59 | 0.59 | 0.59 |
| Mechanical Blaster #3 (EU #18) | Baghouse #18 | 0.58 | 0.58 | 0.58 |
| Mechanical Blaster #5 (EU #21) | Baghouse #21 | 2.00 | 2.00 | 2.00 |
| Mechanical Blaster #6 (EU #23) | Baghouse #23 | 1.50 | 1.50 | 1.50 |
| Hand Blasting Operation (EU #24) | Baghouse #24 | 2.00 | 2.00 | 2.00 |
| Metalizing Booth (EU #26) | Baghouse #26 | 0.70 | 0.70 | 0.70 |

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

(c) The PM emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

(d) The $PM_{10}$ emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the $PM_{10}$ emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

(e) The $PM_{2.5}$ emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM2.5 emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

Compliance with these limits, combined with the potential to emit PM, $PM_{10}$, and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM, $PM_{10}$, and $PM_{2.5}$ to less than two hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

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

Pursuant to 326 IAC 6.8-1-2, the particulate matter (PM) emissions from the emission units, identified as EU #1, EU #2, EU #9, EU #11, EU #13, EU #18, EU #17, EU #21, EU #23, EU #24, and EU #26, shall not exceed 0.03 grains per dry standard cubic foot, each.

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

A Preventive Maintenance Plan is required for EU #1, EU #2, EU #9, EU #11, EU #13, EU #18, EU #17, EU #21, EU #23, EU #24, and EU #26, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

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

(a) No later than five (5) years after the most recent valid compliance demonstration, the Permittee shall perform PM, $PM_{10}$, and $PM_{2.5}$ testing on one (1) of the mechanical blasters, EU #1, EU #2, EU #18, EU #21, or EU #23 to verify compliance with Conditions D.1.1 and D.1.2, utilizing methods as approved by the Commissioner. These tests shall be repeated on a different blaster and control device at least once every five (5) years from the date of the most recent valid compliance demonstration. The blaster tested shall be the blaster in which the longest amount of time has elapsed since its previous test. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. $PM_{10}$ and $PM_{2.5}$ includes filterable and condensable PM.

(b) In order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM, $PM_{10}$, and $PM_{2.5}$ testing on EU #24 and EU #26 no later than sixty (60) days after achieving maximum capacity but not later than one hundred eighty (180) days after initial startup. This testing shall be conducted utilizing methods approved by the Commissioner and shall be repeated at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. $PM_{10}$ and $PM_{2.5}$ includes filterable and condensable PM.

D.1.5 Particulate Matter (PM)

(a) In order to comply with Conditions D.1.1 and D.1.2, the baghouses shall be in operation and control emissions from the EU #1, EU #2, EU #18, EU #21, EU #23, EU #24, and EU #26 at all times that the blasting processes are in operation.

(b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

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

(a) Visible emission notations of the stack exhaust from blaster EU#1, EU #2, EU#18, EU#21, EU#23, and EU #26 shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps. Section C- Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response required by this condition. Failure to take a reasonable response shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring [40 CFR 64]

The Permittee shall record the pressure drop across the baghouses used in conjunction with the abrasive blasting processes, at least once per day when the blasting processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouses for blasters EU #1, EU #2, EU #18, EU #21, EU #23, EU #24, and EU #26 is outside the normal range, the Permittee shall take a reasonable response. The normal range for the baghouses for blaster EU #1 is a pressure drop range between 2.0 and 6.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. The normal range for the baghouses for blasters EU #2 and EU #23 is a pressure drop range between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. The normal range for the baghouses for blasters EU #18, EU #21, EU #24, and EU #26 is a pressure drop range between 1.0 and 5.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C- Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside of the above mentioned ranges is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

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

(a) For a single compartment baghouse, controlling emissions from a process operated continuously, failed units and the associated process shall be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

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

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

D.1.9 Record Keeping Requirements

(a) To document the compliance status with Condition D.1.1(b) - PSD Minor Limits, the Permittee shall keep monthly records of the amount of steel slab ground by the three (3) slab grinders.

(b) To document the compliance status with Condition D.1.6 – Visible Emission Notations, the Permittee shall maintain daily records of visible emission notations of EU#1, EU #2, EU#18, EU#21, EU#23, and EU #26 stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).

(c) To document the compliance status with Condition D.1.7– Parametric Monitoring, the Permittee shall maintain the daily records of the pressure drop across baghouses for units EU #1, EU #2, EU #18, EU #21, EU #23, EU #24, and EU #26. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).

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

D.1.10 Reporting Requirements

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

## SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

**Girder Shop**

(c) One (1) paint booth, identified as EU #15, constructed in 1997, exhausting to general ventilation and using no emission control devices;

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

**Bay #10**

(n) One (1) paint booth, identified as EU#25, approved in 2016 for construction, equipped with HVLP and/or airless applicators, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors;

(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 2-7-5(1)]**

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

(a) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #15 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #22 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.

(c) Pursuant to 326 IAC 8-2-9(d)(1)(A) (Miscellaneous Metal Coating Operations), the VOC content of coatings delivered to the applicator at the paint booth, identified as EU #25 shall be limited such that the Permittee shall not allow the discharge into the atmosphere of VOC in excess of 3.5 pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for extreme performance coatings.

(d) Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating Operations), one (1) or a combination of the following equipment shall be used for coating application in the three (3) paint booths, identified as EU #15, EU #22, and EU #25:

Electrostatic equipment
High volume low-pressure (HVLP) spray equipment
Flow coating
Roller coating
Dip coating, including electrodeposition
Airless spray
Air-assisted airless spray
Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

(e) Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

(1) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(2) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(3) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(4) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(5) Minimize VOC emissions from the cleaning application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

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

In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #22, and EU #25, shall be limited such that the VOC emissions shall not exceed 96.06 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

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

(a) Pursuant to 326 IAC 6.8-1-2(h), particulate from the paint booths EU #15, EU #22, and EU #25 shall be controlled by dry particulate filters, waterwash, or an equivalent control device. The Permittee shall use the following work practices as an equivalent control device:

(1) Conduct all spray coating operations within an enclosed building;

(2) Close man doors, overhead doors and powered vents located within 100 feet of the spray equipment, and keep them closed during spray operations;

(3) Collect dry-fall paint on floor surfaces; and

(4) Collect and dispose dry-fall paint from floor surfaces to prevent re-entrainment to exhaust air.

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

A Preventive Maintenance Plan is required for EU #15, EU #22, and EU #25, and their control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements [326 IAC 2-7-5(1)]**

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

(a) Compliance with the VOC limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

(b) When using non-compliant coatings, compliance with the VOC content limit in Conditions D.2.1(a), D.2.1(b), and D.2.1(c) shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis for the three (3) paint booths, identified as EU #15, EU #22, and EU #25.

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

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

Where:

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

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

Total VOC Emissions = [(VOC Input EU #15)] + [(VOC Input EU #22)] + [(VOC Input EU #25)]

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

D.2.6 Record Keeping Requirements

(a) To document the compliance status with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content and usage limits, and the VOC emission limits established in Conditions D.2.1 and D.2.2.

(1) The amount of VOC in each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a daily and monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(3) When using non-compliant coatings, the volume weighted VOC content of the coating used for each day;

(4) The cleanup solvent usage for each day and for each month;

(5) The total VOC usage for each day and each month.

(6) The total weight of VOC emitted for each month and each compliance period.

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

D.2.7 Reporting Requirements

A quarterly summary of the monthly VOC emissions to document the compliance status with Condition D.2.2 shall be submitted using the reporting form located at the end of this permit, or its equivalent, not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligations with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

## SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

Insignificant Activities

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total.[326 IAC 8-3-2] [326 IAC 8-3-8]

(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 2-7-5(1)]**

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

(a) Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the

department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8, the Permittee shall comply with the following requirements:

(a) Material requirements are as follows:

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

(b) Record keeping requirements are as follows:

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

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

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

(C) The type of solvent purchased.

(D) The total volume of the solvent purchased.

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

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

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

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

## SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

**Emissions Unit Description:**

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

(1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, constructed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2(b)(3)]

(2) Sixty-one (61) space heaters, identified as EU #8, rated at 14.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(3) Four (4) natural gas-fired preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(4) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(5) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2(a)]

(d) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2(a)]

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

(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 2-7-5(1)]**

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

(a) Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), $PM/PM_{10}/PM_{2.5}$ emissions from the brazing equipment, cutting torches, soldering equipment, space heaters, preheat table, preheat oven, cure oven, welding equipment structural steel and bridge fabrication activities and hand grinding, shall be limited to 0.03 grain per dry standard cubic foot.

(b) Pursuant to 326 IAC 6.8-1-2(b)(3), the particulate matter emissions from the 1.80 million British thermal units per hour natural gas-fired boiler, identified as EU #7, shall not exceed 0.01 grains per dry standard cubic foot of exhaust air.

**SECTION E.1** **NESHAP**

**Emissions Unit Description:**

**#1 Blaster Conveyor Line**

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, constructed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #1 is considered an existing affected source.

**Annex**

(b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, constructed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #2 is considered an existing affected source.

**Girder Shop**

(d) Electric arc stick welding, identified as EU #9, constructed in 2001, with a maximum capacity of 2.477 pounds of rods per minute; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #9 is considered an existing affected source.

(e) OxyAcetylene/Methane Cutting, including forty-seven (47) torches exhausting inside the building, collectively identified as EU #13, constructed in 1998, with a total of forty-seven (47) torches operational; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #13 is considered an existing affected source.

(f) One (1) blaster #3, identified as EU #18, constructed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #18 is considered an existing affected source.

(g) One (1) mechanical blaster #5, identified as EU #21, constructed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 21. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #21 is considered an existing affected source.

(i) Submerged arc welding identified as EU #17, constructed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #17 is considered an existing affected source.

**Grinding**

(j) One (1) plate sweep grinder, identified as part of EU #11, constructed in 1990, with a maximum capacity of 75 square feet of steel per hour; [40 CFR 63, Subpart XXXXXX]

(k) Three (3) slab grinders, identified as part of EU #11, constructed in 1991, with a maximum capacity of 613,200 tons of slabs per year total; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #11 is considered an existing affected source.

**Bay #8 West**

(l) One (1) mechanical blaster #6, identified as EU #23, constructed in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #23 is considered a new affected source.

**Bay #10**

(o) One (1) hand blasting operation, identified as EU #24, approved in 2016 for construction, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #24 is considered a new affected source.

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

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart XXXXXX.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart XXXXXX (included as Attachment A to the operating permit).

(a) Dry abrasive blasting affected sources: the mechanical blasters EU #1, 2, 18, 21, and 23, and hand blasting operation EU #24 are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(3)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(a)(2)

(5) 40 CFR 63.11516(a)(3)
(6) 40 CFR 63.11517(a)
(7) 40 CFR 63.11517(b)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 5)
(10) 40 CFR 63.11519(c)(1, 2, 13, and 15)
(11) Table 1 to Subpart XXXXXX

(b) Dry grinding affected sources: the plate and slab grinders EU #11 are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(3)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(c)(1)
(5) 40 CFR 63.11516(c)(2)
(6) 40 CFR 63.11517(a)
(7) 40 CFR 63.11517(b)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 5)
(10) 40 CFR 63.11519(c)(1, 2, 13, and 15)
(11) Table 1 to Subpart XXXXXX

(c) Welding affected sources: the electric arc stick welding EU #9 and submerged arc welding EU #17 are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(5)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(f)
(6) 40 CFR 63.11517(c)
(7) 40 CFR 63.11517(d)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 4, 6, 8, and 9)
(10) 40 CFR 63.11519(c)(1, 3, 11, 12, 13, 14, and 15)
(11) Table 1 to Subpart XXXXXX

**SECTION E.2** **NESHAP**

**Emissions Unit Description:**

Insignificant Activities

(g) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [40 CFR 63, Subpart CCCCCC]

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

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

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart CCCCCC.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

E.2.2 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Dispensing Facilities [40 CFR Part 63, Subpart CCCCCC]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart CCCCCC (included as Attachment B to the operating permit), for the emission units listed above:

(1) 40 CFR 63.11111(a), (b), (e), and (j)
(2) 40 CFR 63.11112(a) and (d)
(3) 40 CFR 63.11113(b) and (c)
(4) 40 CFR 63.11115
(5) 40 CFR 63.11116
(6) 40 CFR 63.11131
(7) 40 CFR 63.11132

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

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Part 70 Permit No.: T089-36385-00161

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____.

☐ Report (specify) _____.

☐ Notification (specify) _____.

☐ Affidavit (specify) _____.

☐ Other (specify) _____.

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. |
| Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

**OFFICE OF AIR QUALITY**
**COMPLIANCE AND ENFORCEMENT BRANCH**
**100 North Senate Avenue**
**MC 61-53 IGCN 1003**
**Indianapolis, Indiana 46204-2251**
**Phone: (317) 233-0178**
**Fax: (317) 233-6865**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Part 70 Permit No.: T089-36385-00161

**This form consists of 2 pages** **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

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

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



| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

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

## Part 70 Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-36385-00161
Facility: Three (3) paint booths, EU #15, EU #22, and EU #25
Parameter: VOC Emissions
Limit: The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #22, and EU #25, shall be limited such that the VOC emissions shall not exceed 96.06 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER:_____ YEAR:_____

| Month | Column 1<br>VOC Emitted (tons)<br>This Month | Column 2<br>VOC Emitted (tons)<br>Previous 11 Months | Column 1 + Column 2<br>VOC Emitted (tons)<br>12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone:_____

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

# Part 70 Quarterly Report

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Permit No.: T089-36385-00161
Facilities: Three (3) slab grinders, EU #11
Parameter: Tons of steel slabs
Limit: The amount of steel slab from the three (3) slab grinders, identified as EU #11, to be ground shall be less than 200,000 tons per twelve (12) consecutive month period with compliance determined at the end of the month.

QUARTER:_____ YEAR:_____

| Month | Column 1<br>Steel Slabs Ground (tons)<br>This Month | Column 2<br>Steel Slabs Ground (tons)<br>Previous 11 Months | Column 1 + Column 2<br>Steel Slabs Ground (tons)<br>12 Month Total |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

☐ No deviation occurred in this quarter.
☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone:_____

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

Source Name: Industrial Steel Construction, Inc.
Source Address: 86 North Bridge Street, Gary, Indiana 46404
Part 70 Permit No.: T089-36385-00161

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

Page 1 of 2

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

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

Form Completed by:_____

Title / Position: _____

Date:_____

Phone: _____

# Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification (SSM) and a Part 70 Operating Permit Renewal

## Source Background and Description

| | |
|---|---|
| **Source Name:** | **Industrial Steel Construction, Inc.** |
| **Source Location:** | **86 North Bridge Street, Gary, Indiana 46404** |
| **County:** | **Lake** |
| **SIC Code:** | **3441 (Fabricated Structural Metal)**<br>**3449 (Miscellaneous Structural Metal Work)** |
| **Permit Renewal No.:** | **T089-36385-00161** |
| **Significant Source Modification No.:** | **089-36435-00161** |
| **Permit Reviewer:** | **Donald McQuigg** |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Industrial Steel Construction, Inc. relating to the operation of a stationary miscellaneous metal working and bridge beam fabrication source. On October 14, 2015, Industrial Steel Construction, Inc. submitted an application to the OAQ requesting to renew its operating permit. In addition, on October 14, 2015, Industrial Steel Construction, Inc. submitted a Significant Source Modification application to the OAQ for the construction and operation of new emissions units.

## Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

**#1 Blaster Conveyor Line**

(a) One (1) mechanical blaster, identified as EU #1, equipped with a baghouse identified as #1 for particulate matter control, constructed in 1968, exhausting through Stack #1, with a maximum capacity of 720 linear feet of steel plates and shapes per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #1 is considered an existing affected source.

**Annex**

(b) One (1) mechanical blaster#4, identified as EU #2, equipped with a baghouse identified as #2 for particulate matter control, constructed in 1990, exhausting through Stack #2, with a maximum capacity of 480 linear feet of steel plates per hour; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #2 is considered an existing affected source.

**Girder Shop**

(c) One (1) paint booth, identified as EU #15, constructed in 1997, exhausting to general ventilation and using no emission control devices;

(d) Electric arc stick welding, identified as EU #9, constructed in 2001, with a maximum capacity of 2.477 pounds of rods per minute; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #9 is considered an existing affected source.

(e) OxyAcetylene/Methane Cutting, including forty-seven (47) torches exhausting inside the building, collectively identified as EU #13, constructed in 1998, with a total of forty-seven (47) torches operational; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #13 is considered an existing affected source.

(f) One (1) blaster #3, identified as EU #18, constructed in 1997, equipped with a baghouse identified as #18 for particulate matter control, exhausting through Stack #18; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #18 is considered an existing affected source.

(g) One (1) mechanical blaster #5, identified as EU #21, constructed in 2006, equipped with a baghouse identified as #21 for particulate matter control and exhausting through Stack # 21. EU #21 will have a maximum media throughput of 487,000 pounds per hour with a capacity of 600 linear feet of steel plate per hour. The blaster would clean scale from steel girders using steel shot; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #21 is considered an existing affected source.

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

(i) Submerged arc welding identified as EU #17, constructed in 1994, with a maximum capacity of 18.25 tons of wire per month total or 219 tons of wire per year; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #17 is considered an existing affected source.

**Grinding**

(j) One (1) plate sweep grinder, identified as part of EU #11, constructed in 1990, with a maximum capacity of 75 square feet of steel per hour; [40 CFR 63, Subpart XXXXXX]

(k) Three (3) slab grinders, identified as part of EU #11, constructed in 1991, with a maximum capacity of 613,200 tons of slabs per year total; [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #11 is considered an existing affected source.

**Bay #8 West**

(l) One (1) mechanical blaster #6, identified as EU #23, constructed in 2013, equipped with a baghouse identified as #23 for particulate matter control and exhausting through Stack # 23. EU #23 will have a maximum media throughput of 240,000 pounds per hour with a capacity of 360 linear feet of steel plate per hour. The blaster will clean scale from fabricated steel using steel shot. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #23 is considered a new affected source.

**Emission Units and Pollution Control Equipment Removed From the Source**

The source has removed the following emission units:

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

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

(c) Two (2) oxy/methane cutting torches.

**Insignificant Activities**

The source also consists of the following insignificant activities:

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, consisting of:

(1) One (1) boiler, identified as EU #7, rated at 1.8 million British thermal units per hour, constructed in 1976, exhausting through Stack #7. [326 IAC 6.8-1-2(b)(3)]

(2) Sixty-one (61) space heaters, identified as EU #8, rated at 14.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(3) Four (4) natural gas-fired preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total. [326 IAC 6.8-1-2(a)]

(4) One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(5) One (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10. [326 IAC 6.8-1-2(a)]

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6: Four (4) parts washers, identified as EU #12, capacity: 725 gallons per year, total. [326 IAC 8-3-2] [326 IAC 8-3-8]

(c) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2(a)]

(d) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.

(2) Using 80 tons or less of welding consumables. [326 IAC 6.8-1-2(a)]

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

(f) Propane for liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.

(g) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [40 CFR 63, Subpart CCCCCC]

(h) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(i) The following VOC and HAP storage containers:

(1) VOC/HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(j) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(k) Machining where an aqueous cutting coolant continuously floods the machining interface.

(l) Cleaners and solvents characterized as follows:

(1) having a vapor pressure equal to or less than 2 kiloPascals; 15 millimeters of mercury; or 0.3 pounds per square inch measured at 38°C (100°F) or;

(2) having a vapor pressure equal to or less than 0.7 kiloPascals; 5 millimeters of mercury; or 0.1 pounds per square inch measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(m) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches soldering equipment, welding equipment. [326 IAC 6.8-1-2(a)]

(n) Closed loop heating and cooling systems.

(o) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(p) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

(q) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(r) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(s) On-site fire and emergency response training approved by the department.

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

Building C

(u) Two (2) solvent stills, constructed on August 1 and October 11, 2005, with capacities 3 and 7 gallons of reclaimed solvents, located in Building C.

Girder Shop

(v) Submerged arc welding, identified as EU #17, constructed in 1994, capacity: 18.25 tons of wire per month total or 219 tons of wire per year located in the Girder Shop. [326 IAC 6.8-1-2(a)]

## Existing Approvals

Since the issuance of the Part 70 Operating Permit Renewal No. T089-29933-00161 on July 11, 2011, the source has constructed or has been operating under the following additional approvals:

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

(b) Significant Source Modification No. 089-32748-00161, issued on July 2, 2013; and

(c) Significant Permit Modification No. 089-32762-00161, issued on July 19, 2013.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

## Enforcement Issue

There are no enforcement actions pending.

## Emission Calculations

See Appendix A of this document for detailed emission calculations.

## County Attainment Status

The source is located in Lake County.

| Pollutant | Designation |
|---|---|
| $SO_2$ | Better than national standards. |
| CO | Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County. |
| $O_3$ | On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. [1,2] |
| $PM_{2.5}$ | Unclassifiable or attainment effective February 6, 2012, for the annual $PM_{2.5}$ standard. |
| $PM_{2.5}$ | Unclassifiable or attainment effective December 13, 2009, for the 24-hour $PM_{2.5}$ standard. |
| $PM_{10}$ | Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County. |
| $NO_2$ | Cannot be classified or better than national standards. |
| Pb | Unclassifiable or attainment effective December 31, 2011. |

[1]The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard.
[2]The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

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

DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides ($NO_x$) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and $NO_x$ emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and $NO_x$ emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) $PM_{2.5}$
Lake County has been classified as attainment for $PM_{2.5}$. Therefore, direct $PM_{2.5}$, $SO_2$, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

## Fugitive Emissions

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

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Unrestricted Potential Emissions | |
|---|---|
| Pollutant | Tons/year |
| PM | 2,794 |
| $PM_{10}$ | 2,794 |
| $PM_{2.5}$ | 2,794 |
| $SO_2$ | 0.06 |
| $NO_x$ | 9.28 |
| VOC | 598.88 |
| CO | 7.79 |
| Single HAP | 9.14 (hexane) |
| Total HAP | 22.86 |

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf ) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's

decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of $PM_{10}$, $PM_{2.5}$, and VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

## Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a source modification application submitted by Industrial Steel Construction, Inc. on October 14, 2015, relating to the construction and operation of new emission units. The following is a list of the proposed emission units and pollution control devices:

(a) One (1) metalizing booth, identified as EU#26, approved in 2016 for construction, with a maximum capacity of 10,220,000 $ft^2$ metal coated/year and a maximum wire usage of 5,110,000 pounds wire/year, using Baghouse #26 for particulate control, and exhausting through Stack # 26;

(b) One (1) paint booth, identified as EU#25, approved in 2016 for construction, equipped with HVLP and/or airless applicators, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors; and

(c) One (1) hand blasting operation, identified as EU#24, approved in 2016 for construction, with particulate emissions evacuated to general ventilation Baghouse #24, and exhausting indoors. [40 CFR 63, Subpart XXXXXX]

Under 40 CFR 63, Subpart XXXXXX, EU #24 is considered a new affected source.

Industrial Steel Construction, Inc. has requested to incorporate the new emissions units and continue to limit the source-wide PM, $PM_{10}$, and $PM_{2.5}$ emissions to less than two hundred fifty (250) tons per year and VOC emissions to less than one hundred (100) tons per year. Therefore,

this source will remain a minor source under 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset).

## Permit Level Determination – Part 70 Modification to an Existing Source

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

| **Increase in PTE Before Controls of the Modification** | |
|---|---|
| **Pollutant** | **Potential To Emit** (ton/yr) |
| PM | 753.04 |
| $PM_{10}$ | 753.04 |
| $PM_{2.5}$ | 753.04 |
| $SO_2$ | - |
| VOC | 288.22 |
| CO | - |
| $NO_X$ | - |
| Single HAPs | - |
| Total HAPs | - |

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to 326 IAC 2-7-10.5(g)(4) because the potential to emit PM, $PM_{10}$, and $PM_{2.5}$ is greater than twenty-five (25) tons per year before control, each.

This permit modification is considered a significant permit modification, pursuant to 326 IAC 2-7-12(d)(1), because this modification does not qualify as a minor permit modification or administrative amendment, and includes significant changes in existing monitoring Part 70 permit terms and conditions as well as significant changes to reporting or record keeping permit terms and conditions. Further, this modification requires a case-by-case determination of an emission limitation or other standard (e.g. PSD Minor limit).

For the purposes of this permitting action, the significant permit modification has been combined with the current Part 70 Operating Permit Renewal. Therefore, operation is not approved until the Part 70 Operating Permit Renewal has been issued.

## Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any new control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | PM | $PM_{10}$* | $PM_{2.5}$** | $SO_2$ | $NO_x$ | VOC | CO | Total HAPs | Worst Single HAP |
| Mechanical blaster EU #1 | 7.67 | 7.67 | 7.67 | - | - | - | - | - | - |
| Mechanical blaster 4 EU #2 | 2.58 | 2.58 | 2.58 | - | - | - | - | - | - |
| Mechanical blaster 3 EU #18 | 2.54 | 2.54 | 2.54 | - | - | - | - | - | - |
| Mechanical blaster 5 EU #21 | 8.76 | 8.76 | 8.76 | - | - | - | - | - | - |
| Mechanical blaster 6 EU #23 | 6.57 | 6.57 | 6.57 | - | - | - | - | - | - |
| Hand blasting EU #24 | 8.76 | 8.76 | 8.76 | - | - | - | - | - | - |
| Electric arc stick welding EU #9 | 11.98 | 11.98 | 11.98 | - | - | - | - | - | - |
| Plate sweep grinder EU #11 | 30.39 | 30.39 | 30.39 | - | - | - | - | - | - |
| Slab grinders EU #11 | 98.60 | 98.60 | 98.60 | - | - | - | - | - | - |
| Oxy acetylene/methane torch cutting EU #13 | 43.22 | 43.22 | 43.22 | - | - | - | - | 0.24 | 0.13 (manganese) |
| Submerged arc welding EU #17 | 7.95 | 7.95 | 7.95 | - | - | - | - | 2.43 | 2.43 (manganese) |
| Parts washers EU #12 | - | - | - | - | - | 2.43 | - | 0.005 | 0.005 (perc) |
| Paint booth EU #15 | 4.09 | 4.09 | 4.09 | - | - | 96.06 | - | 21.05 | 6.41 (hexane) |
| Paint booth EU #22 | 12.85 | 12.85 | 12.85 | - | - | | - | | |
| Paint booth EU #25 | 0.13 | 0.13 | 0.13 | - | - | | - | | |
| Metalizing booth EU #26 | 3.07 | 3.07 | 3.07 | - | - | - | - | - | - |
| Natural gas combustion | 0.18 | 0.71 | 0.71 | 0.06 | 9.28 | 0.51 | 7.79 | 0.18 | 0.17 (hexane) |
| **Total PTE of Entire Source** | **249.33** | **249.85** | **249.85** | **0.06** | **9.28** | **99.00** | **7.79** | **21.05** | **6.58 (hexane)** |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | NA | NA | 250 | NA | NA |
| Emission Offset/ Nonattainment NSR Major Source Thresholds | NA | NA | NA | NA | 100 | 100 | NA | NA | NA |

"-" denotes emission unit does not emit the designated pollutant
* Under the Part 70 Permit program (40 CFR 70), $PM_{10}$ and $PM_{2.5}$, not particulate matter (PM), are each considered as a regulated air pollutant".
**$PM_{2.5}$ listed is direct $PM_{2.5}$.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf ) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHG) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

(a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or

more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of one hundred (100) tons per year or more.

(c) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**Federal Rule Applicability**

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

(1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;

(2) is subject to an emission limitation or standard for that pollutant; and

(3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

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

| Emission Unit / Pollutant | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|---|---|---|---|---|---|---|---|
| EU #1 - $PM_{10}$ | Baghouse | Y | 587 | 11.7 | 100 | Y | N |
| EU #1 - PM | Baghouse | Y | 587 | 11.7 | 100 | Y | N |
| EU #1 - $PM_{2.5}$ | Baghouse | Y | 587 | 11.7 | 100 | Y | N |
| EU #2 - $PM_{10}$ | Baghouse | Y | 128 | 2.6 | 100 | Y | N |
| EU #2 - PM | Baghouse | Y | 128 | 2.6 | 100 | Y | N |
| EU #2 - $PM_{2.5}$ | Baghouse | Y | 128 | 2.6 | 100 | Y | N |
| EU #23 - $PM_{10}$ | Baghouse | Y | 155.9 | 4.5 | 100 | Y | N |
| EU #23 - PM | Baghouse | Y | 155.9 | 4.5 | 100 | Y | N |
| EU #23 - $PM_{2.5}$ | Baghouse | Y | 155.9 | 4.5 | 100 | Y | N |
| EU #18 - $PM_{10}$ | Baghouse | Y | 126 | 2.5 | 100 | Y | N |
| EU #18 - PM | Baghouse | Y | 126 | 2.5 | 100 | Y | N |
| EU #18 - $PM_{2.5}$ | Baghouse | Y | 126 | 2.5 | 100 | Y | N |
| EU #21 - $PM_{10}$ | Baghouse | Y | 631 | 6.3 | 100 | Y | N |
| EU #21 - PM | Baghouse | Y | 631 | 6.3 | 100 | Y | N |
| EU #21 - $PM_{2.5}$ | Baghouse | Y | 631 | 6.3 | 100 | Y | N |
| EU #24 - $PM_{10}$ | Baghouse | Y | 649.5 | 18.8 | 100 | Y | N |
| EU #24 - PM | Baghouse | Y | 649.5 | 18.8 | 100 | Y | N |
| EU #24 - $PM_{2.5}$ | Baghouse | Y | 649.5 | 18.8 | 100 | Y | N |

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to EU #1, EU #2, EU #18, EU #21, EU #23, and EU #24 for PM, $PM_{10}$, and $PM_{2.5}$ upon issuance of the Title V Renewal. A CAM plan will be incorporated into this Part 70 permit renewal.

<u>New Source Performance Standards (NSPS)</u>

(b) The requirements of the New Source Performance Standards for Fossil-Fuel-Fired Steam Generators (40 CFR 60, Subpart D) are not included in this permit renewal for the 1.8

MMBtu/hr natural gas-fired boiler (EU#7) because the maximum heat input capacity of this boiler is less than 250 MMBtu/hr.

(c) The requirements of the New Source Performance Standards for Electric Utility Steam Generating Units (40 CFR 60, Subpart Da) are not included in this permit renewal for the 1.8 MMBtu/hr natural gas-fired boiler (EU#7) because this boiler is not electric utility steam generating unit.

(d) The requirements of the New Source Performance Standards for Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Db) are not included in this permit renewal for the 1.8 MMBtu/hr natural gas-fired boiler (EU#7) because the maximum heat input capacity of this boiler is less than 100 MMBtu/hr.

(e) The requirements of the New Source Performance Standards for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc) are not included in this permit renewal for the 1.8 MMBtu/hr natural gas-fired boiler (EU#7) because the maximum heat input capacity of this boiler is less than 10 MMBtu/hr.

(f) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 (40 CFR 60, Subpart K) (326 IAC 12) are not included in this permit for the gasoline fuel storage tank and petroleum fuel tank because each storage tank does not have a storage capacity greater than 151,412 liters (40,000 gallons) and they were not constructed, reconstructed or modified between the aforementioned dates.

(g) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 (40 CFR 60, Subpart Ka) (326 IAC 12) are not included in this permit for the gasoline fuel storage tank and petroleum fuel tank because each storage tank does not have a storage capacity greater than 151,412 liters (40,000 gallons) and they were not constructed, reconstructed or modified between the aforementioned dates.

(h) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, (40 CFR 60, Subpart Kb) are not included in this permit for the gasoline fuel storage tank and petroleum fuel tank because each storage tank does not have a storage capacity greater than 75,000 liters (19,813 gallons).

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

National Emission Standards for Hazardous Air Pollutants (NESHAPS)

(j) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Nine Metal Fabrication and Finishing Source Categories (40 CFR 63.11514, Subpart XXXXXX) beacuse this source is primarly engaged in operations of manufacturing fabricated metal products (SIC code 3499), which is one of the nine source categories listed in 40 CFR 63.11514, and operates affected sources that uses materials that contain metal fabrication and finishing HAP (MFHAP) or that have the potential to emit MFHAP. MFHAP compounds include compounds of cadmium, chromium, lead, manganese, and nickel. Materials that contain MFHAP are defined to be materials that contain greater than 0.1 percent for carcinogens, as defined by OSHA at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for non-carcinogens. For the MFHAP, this corresponds to materials that contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (of the metal), and materials that contain

manganese in amounts greater than or equal to 1.0 percent by weight (of the metal), as shown in formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet for the material. The surface coatings applied at this source do not contain metal fabrication and finishing HAP (MFHAP). Therefore, the surface coating booths are not subject to Subpart XXXXXX.

Dry abrasive blasting affected sources: the mechanical blasters EU #1, 2, 18, 21, and 23, and hand blasting operation EU #24 are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(3)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(a)(2)
(5) 40 CFR 63.11516(a)(3)
(6) 40 CFR 63.11517(a)
(7) 40 CFR 63.11517(b)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 5)
(10) 40 CFR 63.11519(c)(1, 2, 13, and 15)
(11) Table 1 to Subpart XXXXXX

Dry grinding affected sources: the plate and slab grinders EU #11are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(3)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(c)(1)
(5) 40 CFR 63.11516(c)(2)
(6) 40 CFR 63.11517(a)
(7) 40 CFR 63.11517(b)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 5)
(10) 40 CFR 63.11519(c)(1, 2, 13, and 15)
(11) Table 1 to Subpart XXXXXX

Welding affected sources: the electric arc stick welding EU #9 and submerged arc welding EU #17 are each subject the following applicable portions of the NESHAP:

(1) 40 CFR 63.11514(a)(4)
(2) 40 CFR 63.11514(b)(5)
(3) 40 CFR 63.11515
(4) 40 CFR 63.11516(f)
(6) 40 CFR 63.11517(c)
(7) 40 CFR 63.11517(d)
(8) 40 CFR 63.11519(a)
(9) 40 CFR 63.11519(b)(1 through 4, 6, 8, and 9)
(10) 40 CFR 63.11519(c)(1, 3, 11, 12, 13, 14, and 15)
(11) Table 1 to Subpart XXXXXX

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

(k) This source is subject to the National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities (40 CFR Part 63, Subpart CCCCCC) because the source operates at least one (1) gasoline dispensing facility that is located

at, or is part of, an area source of HAP. The one (1) gasoline storage tank, a gasoline dispensing facility, was constructed prior to November 9, 2006. Therefore, the one (1) gasoline storage tank is considered an existing affected source under Subpart CCCCCC. The applicable requirements of Subpart CCCCCC for the existing gas dispensing facility were not included in the last permit renewal action. This is a Title I change.

The one (1) gasoline storage tank is subject to the following portions of 40 CFR 63, Subpart CCCCCC (nonapplicable portions of the NESHAP will not be included in the permit):

(1) 40 CFR 63.11111(a), (b), (e), and (j)
(2) 40 CFR 63.11112(a) and (d)
(3) 40 CFR 63.11113(b) and (c)
(4) 40 CFR 63.11115
(5) 40 CFR 63.11116
(6) 40 CFR 63.11131
(7) 40 CFR 63.11132

Pursuant to 40 CFR 63.11113(b), the Permittee must comply with the standards in Subpart CCCCCC no later than January 10, 2011.

The provisions of 40 CFR 63 Subpart A – General Provisions, which are incorporated as 326 IAC 20-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart CCCCCC.

(l) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources (40 CFR 63, Subpart JJJJJJ) are not included in this permit renewal because, pursuant to 40 CFR 63.11195(e), the 1.8 MMBtu/hr natural gas-fired boiler (EU#7) is exempt from the requirements of subpart JJJJJJ.

(m) The requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 40 CFR 63 Subpart T) are not included in this permit renewal. 40 CFR 63 Subpart T does not apply to the parts washers EU #12 because they do not use any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform or any combination of these halogenated HAP solvents, in a total concentration greater than five (5) percent by weight, as a cleaning and/or drying agent.

(n) The requirements of the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR 63, Subpart MMMM) are not included in this permit renewal because the source is not a major source of HAP and does not apply surface coatings to metal parts or products, as defined in 40 CFR 63.3881.

(o) The requirements of the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources (40 CFR 63, Subpart HHHHHH) are not included in this permit renewal because the source does not spray apply coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), collectively referred to as the target HAP to any part or product made of metal.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

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

(a) The PM, $PM_{10}$, and $PM_{2.5}$ emissions from the following processes shall not exceed the emission limits listed in the table below:

| Process | Baghouse ID | PM Emission Limit (lbs/hr) | $PM_{10}$ Emission Limit (lbs/hr) | $PM_{2.5}$ Emission Limit (lbs/hr) |
|---|---|---|---|---|
| Mechanical Blaster #1 (EU #1) | Baghouse #1 | 1.75 | 1.75 | 1.75 |
| Mechanical Blaster #4 (EU#2) | Baghouse #2 | 0.59 | 0.59 | 0.59 |
| Mechanical Blaster #3 (EU #18) | Baghouse #18 | 0.58 | 0.58 | 0.58 |
| Mechanical Blaster #5 (EU #21) | Baghouse #21 | 2.00 | 2.00 | 2.00 |
| Mechanical Blaster #6 (EU #23) | Baghouse #23 | 1.50 | 1.50 | 1.50 |
| Hand Blasting Operation (EU #24) | Baghouse #24 | 2.00 | 2.00 | 2.00 |
| Metalizing Booth (EU #26) | Baghouse #26 | 0.70 | 0.70 | 0.70 |

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

(c) The PM emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the PM emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

(d) The $PM_{10}$ emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the $PM_{10}$ emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

(e) The $PM_{2.5}$ emissions shall not exceed 0.0493 percent of steel slabs. Compliance with this limit combined with Condition D.1.1(b) will limit the $PM_{2.5}$ emissions from the steel slab to be less than 98.6 tons per twelve (12) consecutive month period.

Compliance with these limits combined with the potential to emit PM, $PM_{10}$, and $PM_{2.5}$ from all other emission units at this source, shall limit the source-wide total potential to emit of PM, $PM_{10}$, and $PM_{2.5}$ to less than two hundred fifty (250) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

326 IAC 2-3 (Emission Offset)

The source has requested to limit the combined VOC emissions from the three (3) paint booths, in order to render the requirements of 326 IAC 2-3 not applicable. In order to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable, the source shall comply with the following:

(1) The total VOC input, including coatings and solvent used for dilution and clean-up to the paint booths, identified as EU #15, EU #22, and EU #25, shall be limited such that the VOC emissions shall not exceed 96.06 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

Compliance with this limit will determined using the following equation:

Total VOC Emissions = [(VOC Input EU #15)] + [(VOC Input EU #22) + [(VOC Input EU #25)]

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

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

326 IAC 2-6 (Emission Reporting)
This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Lake County and its emissions of VOC are greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2016, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Cerification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

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

326 IAC 6-4 (Fugitive Dust Emissions)
This source is subject to 326 IAC 6-4 for fugitive dust emissions. Pursuant to this rule, fugitive particulate matter emissions shall not be visible crossing the property lines.

326 IAC 6.8-10 (Lake County Fugitive Particulate Matter)
This source is not subject to 326 IAC 6.8-10 for fugitive dust control requirements because the source does not have facilities or operations that have the potential to emit five (5) tons per year of fugitive particulate matter into the atmosphere in Lake County.

**State Rule Applicability – Abrasive Blasters (EU #1, 2, 18, 21, and 24) and Metalizing Booth (EU #26)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the abrasive blasters (EU #1, 2, 18, 21, and 24) or the metalizing booth (EU #26) because they are subject to a more stringent particulate matter limit under 326 IAC 6.8 (Particulate Matter Limitations For Lake County).

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
The source is located in Lake County but none of its facilities are specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The potential to emit particulate matter for this entire source is more than one hundred (100) tons per year and actual particulate emissions are more than ten (10) tons per year. Therefore, each of the abrasive blasters (EU #1, 2, 18, 21, and 24) and metalizing booth (EU #26) is subject to 326 IAC 6.8-1-2. Pursuant to 326

IAC 6.8-1-2(a), particulate matter emissions from each of the abrasive blasters (EU #1, 2, 18, 21, and 24) and metalizing booth (EU #26) shall not be greater than three-hundredths (0.03) grain per dry standard cubic foot (dscf).

**State Rule Applicability - Natural Gas-Fired Boiler (EU #7)**

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The source is located in Lake County but none of its facilities are specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The potential to emit particulate matter for this entire source is more than one hundred (100) tons per year and actual particulate emissions are more than ten (10) tons per year. Therefore, the one (1) 1.8 MMBtu/hr natural gas-fired boiler (EU #7) is subject to 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(b)(3), particulate matter emissions from the one (1) 1.8 MMBtu/hr natural gas-fired boiler (EU #7) shall not be greater than one-hundredth (0.01) grain per dry standard cubic foot (dscf).

326 IAC 7-1.1 Sulfur Dioxide Emission Limitations

The one (1) 1.8 MMBtu/hr natural gas-fired boiler (EU #7) is not subject to 326 IAC 326 IAC 7-1.1 because its $SO_2$ PTE is less than twenty-five (25) tons/year or ten (10) pounds/hour.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

The one (1) 1.8 MMBtu/hr natural gas-fired boiler (EU #7) is not subject to the requirements of 326 IAC 8-1-6 because it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

**State Rule Applicability - Natural Gas-Fired Operations**

**One (1) natural gas-fired cure oven, rated at 1.4 million British thermal units per hour; four (4) natural gas-fired preheat tables and torches, identified as EU #14, rated at 0.30 million British thermal units per hour each or 1.2 million British thermal units per hour total; one (1) natural gas-fired preheat oven, rated at 2.58 million British thermal units per hour, constructed in 2001, and exhausted through Stack #10; and sixty-one (61) space heaters, identified as EU #8, rated at 14.2 million British thermal units per hour total.**

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The source is located in Lake County but none of its facilities are specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The potential to emit particulate matter for this entire source is more than one hundred (100) tons per year and actual particulate emissions are more than ten (10) tons per year. Therefore, each of the natural gas-fired combustion facilities listed above is subject to 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from each of the natural gas-fired combustion facilities listed in this section above shall not be greater than three-hundredths (0.03) grain per dry standard cubic foot (dscf).

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Each of the natural gas-fired combustion facilities listed above do not have the potential to emit greater than twenty-five (25) tons of $SO_2$ per year or ten (10) pounds of $SO_2$ per hour. Therefore, each of the natural gas-fired combustion facilities listed above is not subject to the requirements of 326 IAC 7-1.1.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)

Each of the natural gas-fired combustion facilities listed above are not subject to the requirements of 326 IAC 8-1-6, because each facility has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

**State Rule Applicability - Degreasing Operations (EU #12)**

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

The cold cleaner degreasing operation (EU #12) was constructed after July 1, 1990 and is not equipped with a remote solvent reservoir. Therefore, this operation is subject to the requirements of 326 IAC 8-3-2.

(a) Pursuant to 326 IAC 8-3-2(a), the owner or operator of a cold cleaner degreaser shall ensure the following control equipment and operating requirements are met:

(1) Equip the degreaser with a cover.

(2) Equip the degreaser with a device for draining cleaned parts.

(3) Close the degreaser cover whenever parts are not being handled in the degreaser.

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.

(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).

(6) Store waste solvent only in closed containers.

(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-2(b), the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:

(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent used is insoluble in, and heavier than, water.

(C) A refrigerated chiller.

(D) Carbon adsorption.

(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.

(2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

(3) If used, solvent spray:

(A) must be a solid, fluid stream; and

(B) shall be applied at a pressure that does not cause excessive splashing.

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

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

(a) Material requirements are as follows:

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

(b) Record keeping requirements are as follows:

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

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

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

(C) The type of solvent purchased.

(D) The total volume of the solvent purchased.

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

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

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

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

**State Rule Applicability - Surface Coating Operations (EU #15, EU #22, EU #25)**

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The source is located in Lake County but none of its facilities are specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The potential to emit particulate matter for this entire source is more than one hundred (100) tons per year or actual particulate emissions are more than ten (10) tons per year. Therefore, each of the surface coating facilities is subject to 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(h), surface coating facilities shall be controlled by a dry particulate filter, waterwash, or an equivalent control device. The source shall operate the control device in accordance with manufacturer's specifications

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

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

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

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

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

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

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

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

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

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

Electrostatic equipment
High volume low-pressure (HVLP) spray equipment
Flow coating
Roller coating
Dip coating, including electrodeposition
Airless spray
Air-assisted airless spray
Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

This booth currently uses airless spray equipment.

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

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

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

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

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

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

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

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

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

Electrostatic equipment
High volume low-pressure (HVLP) spray equipment
Flow coating
Roller coating
Dip coating, including electrodeposition
Airless spray
Air-assisted airless spray
Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

This booth currently uses airless spray equipment.

(c) Pursuant to 326 IAC 8-2-1(a)(5), the paint booth, identified as EU #25, is subject to 326 IAC 8-2-9 because it is located in Lake County, has actual before control VOC emissions greater than fifteen (15) pounds per day and it coats metal parts.

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

(1) Pursuant to 326 IAC 8-2-9(d)(1)(A), on or after April 1, 2011, the owner or operator engaged in the surface coating of miscellaneous metal or plastic parts and products in which the total actual VOC emissions from all miscellaneous

metal or plastic parts or products coating operations, including related cleaning activities, are equal to or exceed fifteen (15) pounds per day, before add-on controls, located in Lake County or Porter County, shall comply with the VOC limits based on low VOC coatings as follows:

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

Currently, all coatings used in paint booth EU #25 are compliant extreme performance coatings and the coatings are air dried. The source continues to require the flexibility to use a wide variety of paints containing various concentrations of VOCs in order to meet customer specifications. Therefore, pursuant to 326 IAC 8-1-2(a)(7), the source has requested to continue to be able to use daily volume weighted averaging to show compliance when using non-compliant coatings.

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

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

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

(2) Pursuant to 326 IAC 8-2-9(d)(2), one (1) or a combination of the following equipment shall be used for coating application in EU #25:

Electrostatic equipment
High volume low-pressure (HVLP) spray equipment
Flow coating
Roller coating
Dip coating, including electrodeposition
Airless spray
Air-assisted airless spray
Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying

This booth currently uses airless spray equipment.

(d) Paint booths EU#15, EU#22, EU#25;
Pursuant to 326 IAC 8-2-9(d)(3), an owner or operator may achieve compliance by using a capture and control device that achieves a minimum overall VOC control efficiency of ninety percent (90%) instead of using use low VOC coatings and application methods specified under 326 IAC 8-2-9(d)(2). The required overall add-on control efficiency, when combining add-on control with low VOC coatings, must be determined using 326 IAC 8-1-2(c).

(e) Paint booths EU#15, EU#22, EU#25;
Pursuant to 326 IAC 8-2-9(f), work practices shall be used to minimize VOC emissions from mixing operations, storage tanks, and other containers, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not limited to, the following:

(i) Store all VOC containing coatings, thinners, coating related waste, and cleaning materials in closed containers.

(ii) Ensure that mixing and storage containers used for VOC containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials.

(iii) Minimize spills of VOC containing coatings, thinners, coating related waste, and cleaning materials.

(iv) Convey VOC containing coatings, thinners, coating related waste, and cleaning materials from one (1) location to another in closed containers or pipes.

(v) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

(f) Paint booths EU#15, EU#22, EU#25;
Paint booths EU #15, EU#22, and EU #25 are separate facilities under 326 IAC 8-2. Therefore, the source can only use daily averaging for coatings used within a facility. A source cannot include in a daily average coatings used in another facility.

**State Rule Applicability - Electric Arc Stick Welding (EU #9), Submerged Arc Welding (EU #17), and Oxy Acetylene/Methane Torch Cutting (EU #13)**

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
The requirements of 326 IAC 6-3-2 are not applicable to the electric arc stick welding (EU #9), submerged arc welding (EU #17) or the oxy acetylene/methane torch cutting (EU #13) because they are subject to a more stringent particulate matter limit under 326 IAC 6.8 (Particulate Matter Limitations For Lake County).

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
The source is located in Lake County but none of its facilities are specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The potential to emit particulate matter for this entire source is more than one hundred (100) tons per year and actual particulate emissions are more than ten (10) tons per year. Therefore, each electric arc stick welding station (EU #9), submerged arc welding station (EU #17), and oxy acetylene/methane cutting torch (EU #13) is subject to 326 IAC 6.8-1-2. Pursuant to 326 IAC 6.8-1-2(a), particulate matter emissions from each electric arc stick welding station (EU #9), submerged arc welding station (EU #17), and oxy acetylene/methane cutting torch (EU #13) shall not be greater than three-hundredths (0.03) grain per dry standard cubic foot (dscf).

**Compliance Determination and Monitoring Requirements**

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

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in

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

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

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|---|---|---|---|---|
| Baghouse #1 | Water Pressure Drop | Daily | 2 to 6 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |
| Baghouse #2 | Water Pressure Drop | Daily | 1 to 8 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |
| Baghouse #18 | Water Pressure Drop | Daily | 1 to 5 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |
| Baghouse #21 | Water Pressure Drop | Daily | 1 to 5 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |
| Baghouse #23 | Water Pressure Drop | Daily | 1 to 8 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |
| Baghouse #24 | Water Pressure Drop | Daily | 1 to 5 inches | Response Steps |
| | Visible Emissions* | | Normal-Abnormal | |
| Baghouse #26 | Water Pressure Drop | Daily | 1 to 5 inches | Response Steps |
| | Visible Emissions | | Normal-Abnormal | |

*The emissions from Baghouse #24 exhaust to general ventilation in the building rather than ceiling stacks or vents. Therefore, the source is not required to perform rooftop and nearby ground overspray observations.

These compliance monitoring requirements are necessary because the baghouses for the abrasive blasting operations must operate properly to ensure compliance with 326 IAC 2-2 (PSD) minor limits, 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County), and 40 CFR 64 (CAM).

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

| Testing Requirements | | | | |
|---|---|---|---|---|
| **Emission Unit** | **Control Device** | **Pollutant** | **Timeframe for Testing** | **Frequency of Testing** |
| Mechanical Blasters (EU #1, EU#2, EU #18, EU #21,and EU #23) | Baghouse #1, #2, #18, #21, and #23 | PM, $PM_{10}$, & $PM_{2.5}$ | No later than five (5) years from the most recent valid compliance determination | Once every five (5) years* |
| Hand Blasting (EU #24) Metalizing Booth (EU #26) | Baghouses #24 and #26 | PM, $PM_{10}$, & $PM_{2.5}$ | Not later than 60 days after achieving maximum capacity, but no later than 180 days after initial startup | Once every five (5) years |

*The current permit only requires the source to test one of the abrasive blasters EU #1, #2, #18, #21, and #23 once every five (5) years. These tests shall be repeated on a different blaster and associated control device at least once every five (5) years from the date of the most recent valid compliance demonstration. The blaster tested shall be the blaster in which the longest amount of time has elapsed since its previous test.

These testing requirements are necessary because the baghouses for the abrasive blasting operations and metalizing surface coating must operate properly to ensure compliance with 326 IAC 2-2 (PSD) minor limits, 326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County), and 40 CFR 64 (CAM).

## Recommendation

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

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

An application for the purposes of this review was received on October 14, 2015. Additional information was received on November 24, 2015.

## Conclusion

The operation of this stationary miscellaneous metal working and bridge beam fabrication source shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-36385-00161.

## IDEM Contact

(a) Questions regarding this proposed permit can be directed to Donald McQuigg 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) 234-4240 or toll free at 1-800-451-6027 extension 4-4240.

(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 Permit Guide on the Internet at: http://www.in.gov/idem/5881.htm; and the Citizens' Guide to IDEM on the Internet at: http://www.in.gov/idem/6900.htm.

**Appendix A: Emissions Calculations**
**Emissions Summary**

**Source Name:** Industrial Steel Construction, Inc
**Source Location:** 86 North Bridge Street, Gary, IN 46404
**Part 70 Operating Permit Renewal Number:** T089-36385-00161
**Significant Source Modification Number:** 089-36435-00161
**Permit Reviewer:** Donald McQuigg
**Date:** October 14, 2015

| Uncontrolled Potential Emissions (tons/year) | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Unit** | **PM** | **$PM_{10}$** | **$PM_{2.5}$** | **$SO_2$** | **NOx** | **VOC** | **CO** | **Single HAP** | | **Total HAPs** |
| Mechanical Blaster EU #1 | 586.79 | 586.79 | 586.79 | - | - | - | - | - | - | - |
| Mechanical Blaster 4 EU #2 | 128.36 | 128.36 | 128.36 | - | - | - | - | - | - | - |
| Blaster 3 EU #18 | 126.14 | 126.14 | 126.14 | - | - | - | - | - | - | - |
| Mechanical Blaster 5 EU #21 | 630.72 | 630.72 | 630.72 | - | - | - | - | - | - | - |
| Mechanical Blaster 6 EU #23 | 155.88 | 155.88 | 155.88 | - | - | - | - | - | - | - |
| **Hand Blasting EU #24** | 649.49 | 649.49 | 649.49 | - | - | - | - | - | - | - |
| Electric Arc Stick welding EU #9 | 11.98 | 11.98 | 11.98 | - | - | - | - | - | - | - |
| Plate Sweep Grinder EU #11 | 30.39 | 30.39 | 30.39 | - | - | - | - | - | - | - |
| Slab Grinders EU #11 | 302.31 | 302.31 | 302.31 | - | - | - | - | - | - | - |
| Oxy Acetylene/Methane Cutting EU#13 | 43.22 | 43.22 | 43.22 | - | - | - | - | 0.13 | manganese | 0.24 |
| Submerged Arc welding EU #17 | 7.95 | 7.95 | 7.95 | - | - | - | - | 2.43 | manganese | 2.43 |
| Part Washers EU #12 | - | - | - | - | - | 2.43 | - | 0.005 | perc | 0.005 |
| Paint Booth EU #15 | 4.09 | 4.09 | 4.09 | - | - | 19.50 | - | 6.41 | hexane | 20.01 |
| Paint Booth EU #22 | 12.85 | 12.85 | 12.85 | - | - | 288.22 | - | | | |
| **Paint Booth EU #25** | 12.85 | 12.85 | 12.85 | - | - | 288.22 | - | | | |
| **Metalizing Booth EU #26** | 90.70 | 90.70 | 90.70 | - | - | - | - | - | - | - |
| Natural Gas Combustion | 0.18 | 0.71 | 0.71 | 0.06 | 9.28 | 0.51 | 7.79 | 0.17 | hexane | 0.18 |
| **Total Emissions** | **2,794** | **2,794** | **2,794** | **0.06** | **9.28** | **598.88** | **7.79** | **9.14** | **hexane** | **22.86** |

| Limited/Controlled Potential Emissions (tons/year) | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|
| **Emission Unit** | **PM** | **$PM_{10}$** | **$PM_{2.5}$** | **$SO_2$** | **NOx** | **VOC** | **CO** | **Single HAP** | | **Total HAPs** |
| Mechanical Blaster EU #1 | 7.67 | 7.67 | 7.67 | - | - | - | - | - | - | - |
| Mechanical Blaster 4 EU #2 | 2.58 | 2.58 | 2.58 | - | - | - | - | - | | - |
| Blaster 3 EU #18 | 2.54 | 2.54 | 2.54 | - | - | - | - | - | - | - |
| Mechanical Blaster 5 EU #21 | 8.76 | 8.76 | 8.76 | - | - | - | - | - | - | - |
| Mechanical Blaster 6 EU #23 | 6.57 | 6.57 | 6.57 | - | - | - | - | - | - | - |
| **Hand Blasting EU #24** | 8.76 | 8.76 | 8.76 | - | - | - | - | - | - | - |
| Electric Arc Stick welding EU #9 | 11.98 | 11.98 | 11.98 | - | - | - | - | - | - | - |
| Plate Sweep Grinder EU #11 | 30.39 | 30.39 | 30.39 | - | - | - | - | - | - | - |
| Slab Grinders EU #11 | 98.60 | 98.60 | 98.60 | - | - | - | - | - | - | - |
| Oxy Acetylene/Methane Cutting EU#13 | 43.22 | 43.22 | 43.22 | - | - | - | - | 0.13 | manganese | 0.24 |
| Submerged Arc welding EU #17 | 7.95 | 7.95 | 7.95 | - | - | - | - | 2.43 | manganese | 2.43 |
| Part Washers EU #12 | - | - | - | - | - | 2.43 | - | 0.005 | perc | 0.005 |
| Paint Booth EU #15 | 4.09 | 4.09 | 4.09 | - | - | 96.06 | - | 6.41 | hexane | 20.01 |
| Paint Booth EU #22 | 12.85 | 12.85 | 12.85 | - | - | | - | | | |
| **Paint Booth EU #25** | 0.13 | 0.13 | 0.13 | - | - | | - | | | |
| **Metalizing Booth EU #26** | 3.07 | 3.07 | 3.07 | - | - | - | - | - | - | - |
| Natural Gas Combustion | 0.18 | 0.71 | 0.71 | 0.06 | 9.28 | 0.51 | 7.79 | 0.17 | hexane | 0.18 |
| **Total Emissions** | **249.33** | **249.85** | **249.85** | **0.06** | **9.28** | **99.00** | **7.79** | **6.58** | **hexane** | **22.86** |

**Appendix A: Emissions Calculations**
**PTE of Source Modification**

**Source Name:** Industrial Steel Construction, Inc
**Source Location:** 86 North Bridge Street, Gary, IN 46404
**Part 70 Operating Permit Renewal Number:** T089-36385-00161
**Significant Source Modification Number:** 089-36435-00161
**Permit Reviewer:** Donald McQuigg
**Date:** October 14, 2015

**1. Metalizing Surface Coating Operation (EU#26), Building A**

| | | | | | Uncontrolled PTE (tons/yr) | | | Controlled PTE (tons/yr) | | |
|---|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | Max Rate ($ft^2$ metal/yr) | Wire Usage Rate (lb wire/ $ft^2$ metal) | Emission Factor[(1)] (lb PM / lb wire) | Baghouse Control Efficiency | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ |
| EU #26 | 1.022E+07 | 0.5 | 0.0355 | 98% | 90.70 | 90.70 | 90.70 | 1.81 | 1.81 | 1.81 |

[(1)] Provided by the source.

**Methodology:**
Uncontrolled Particulate PTE (tons/yr) = Max Rate ($ft^2$ metal/yr) * Wire Usage Rate (lb wire/$ft^2$ metal) * Emission Factor (lb PM/lb wire) * (1 ton/2000 lbs)
Controlled Particulate PTE (tons/yr) = Max Rate ($ft^2$ metal/yr) * Wire Usage Rate (lb wire/$ft^2$ metal) * Emission Factor (lb PM/lb wire) * (1-Control Efficiency) * (1 ton/2000 lbs)
Assumes $PM_{10}$ = $PM_{2.5}$ = PM

**2. Metalizing Surface Coating Operation (EU #26): PSD Minor Limits**

| Controlled PTE (tons/yr) | | | Limited PTE (lbs/hr) | | | Limited PTE (tons/yr) | | |
|---|---|---|---|---|---|---|---|---|
| PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ |
| 1.81 | 1.81 | 1.81 | 0.70 | 0.70 | 0.70 | 3.07 | 3.07 | 3.07 |

**3. Metal Surface Coating Operation (EU#25), Bay 10**

| Material | Density (Lb/Gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum Rate (unit/hr) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (lb/hr) | Potential VOC (ton/yr) | Particulate Potential Uncontrolled (ton/yr) | Particulate Potential Controlled (ton/yr) | Transfer Efficiency |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| EU #25 Paint | 7.40 | 47.3% | 0% | 47.3% | 0% | 0% | 18.800 | 1 | 3.50 | 3.50 | 65.80 | 288.22 | 12.85 | 0.13 | 96% |

[1] The high transfer efficiency is for hand spraying of large parts.

Particulate control efficiency = 99.0%

**Methodology:**
Particulate Potential (tons/yr) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Potential VOC (tons/yr) = (pounds VOC/ Gallon coating) * (gal. of Material/unit) * Max. units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Controlled Emissions (ton/yr) = Uncontrolled Potential to Emit (ton/yr) * (1 - Control Efficiency)

**4. Hand Blasting Operation (EU#24), Bay 10**

| Unit ID | Inlet Grain Loading (gr/scf)* | Outlet Grain Loading** (gr/scf) | Air flow rate (scfm) | Control Efficiency | Uncontrolled PM PTE (lb/hr) | Uncontrolled PM PTE (tons/yr) | Controlled PM PTE (lb/hr) | Controlled PM PTE (tons/yr) | Limited PM PTE (lb/hr) | Limited PM PTE (tons/yr) |
|---|---|---|---|---|---|---|---|---|---|---|
| EU#24 | 0.346 | 0.01 | 50,000 | 99.00% | 148.29 | 649.49 | 4.29 | 18.77 | 2.00 | 8.76 |

**Methodology:**
* Based on manufacturer inlet loading rate calculations
** Outlet grain loading guarantee
Uncontrolled Particulate PTE (lb/hr) = Inlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Controlled Particulate PTE (lb/hr) = Outlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Uncontrolled/Controlled PTE (tons/yr) = Uncontrolled/Controlled Particulate PTE * 8,760 (hr/yr) * 1/2,000 (ton/lb)
Assumes $PM_{10}$ = $PM_{2.5}$ = PM

**5. Total Uncontrolled PTE of Modification**

| Uncontrolled PTE of Modification (tons/year) | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| PM | $PM_{10}$ | $PM_{2.5}$ | $SO_2$ | NOx | VOC | CO | Total HAPs | Highest Single HAP | |
| 753.04 | 753.04 | 753.04 | - | - | 288.22 | - | - | - | - |

**Appendix A: Emissions Calculations**
**Potential Particulate Emission from Abrasive Blasters (EU #1, #2, #18, #21, #23)**

**Source Name:** **Industrial Steel Construction, Inc**
**Source Location:** **86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number:** **T089-36385-00161**
**Significant Source Modification Number:** **089-36435-00161**
**Permit Reviewer:** **Donald McQuigg**
**Date:** **October 14, 2015**

| Potential To Emit PM/PM10/PM2.5 | | | | | | Controlled | 326 IAC 2-2 | Limited |
|---|---|---|---|---|---|---|---|---|
| Unit ID/Emission Unit | | Outlet Grain Loading (gr/dscf) | Air Flow (dscf/min) | Control Efficiency % | PTE (ton/yr)* | ton/yr | lb/hr | ton/yr |
| EU #1 | Blaster 1 | 0.02 | 15,630 | 98% | 587 | 11.74 | 1.75 | 7.67 |
| EU #2 | Blaster 4 | 0.02 | 3,419 | 98% | 128 | 2.57 | 0.59 | 2.58 |
| EU #18 | Blaster 3 | 0.006 | 11,200 | 98% | 126 | 2.52 | 0.58 | 2.54 |
| EU #21 | Blaster 5 | 0.0056 | 30,000 | 99% | 631 | 6.31 | 2.00 | 8.76 |
| | | | | **Total** | **1,472** | | | |

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

| Unit ID | Inlet Grain Loading (gr/scf)* | Outlet Grain Loading** (gr/scf) | Air flow rate (scfm) | Capture Efficiency | Control Efficiency | Uncontrolled Particulate PTE (lb/hr) | Uncontrolled Particulate PTE (tons/yr) | Controlled Particulate PTE (lb/hr) | Controlled Particulate PTE (tons/yr) | Limited Particulate PTE (lb/hr) | Limited Particulate PTE (tons/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Blaster 6 EU #23 | 0.346 | 0.01 | 12,000 | 100.00% | 99.80% | 35.59 | 155.88 | 1.03 | 4.51 | 1.50 | 6.57 |

**Methodology**
* Based on manufacturer inlet loading rate calculations
** Outlet grain loading guarantee
Uncontrolled Particulate PTE (lb/hr) = Inlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Controlled Particulate PTE (lb/hr) = Outlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Uncontrolled/Controlled PTE (tons/yr) = Uncontrolled/Controlled Particulate PTE * 8,760 (hr/yr) * 1/2,000 (ton/lb)
Assumes PM10 and PM2.5 = PM

**Appendix A: Emissions Calculations**
**Potential Particulate Emission from Hand Blasting Operation EU #24**

**Source Name:** **Industrial Steel Construction, Inc**
**Source Location:** **86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number:** **T089-36385-00161**
**Significant Source Modification Number:** **089-36435-00161**
**Permit Reviewer:** **Donald McQuigg**
**Date:** **October 14, 2015**

**1. Hand Blasting Operation (EU#24), Bay 10**

| Unit ID | Inlet Grain Loading (gr/scf)* | Outlet Grain Loading** (gr/scf) | Air flow rate (scfm) | Control Efficiency | Uncontrolled PM PTE (lb/hr) | Uncontrolled PM PTE (tons/yr) | Controlled PM PTE (lb/hr) | Controlled PM PTE (tons/yr) | Limited PM PTE (lb/hr) | Limited PM PTE (tons/yr) |
|---|---|---|---|---|---|---|---|---|---|---|
| EU#24 Baghouse | 0.346 | 0.01 | 50,000 | 99.00% | 148.29 | 649.49 | 4.29 | 18.77 | 2.00 | 8.76 |

**Methodology:**
* Based on manufacturer inlet loading rate calculations
** Outlet grain loading guarantee
Uncontrolled Particulate PTE (lb/hr) = Inlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Controlled Particulate PTE (lb/hr) = Outlet Grain Loading (gr/scf) * Air flow rate (scfm) * 60 (min/hr) * 1/7,000 (lb/gr)
Uncontrolled/Controlled PTE (tons/yr) = Uncontrolled/Controlled Particulate PTE * 8,760 (hr/yr) * 1/2,000 (ton/lb)
Assumes $PM_{10}$ = $PM_{2.5}$ = PM

**Appendix A: Emissions Calculations**
**Potential Particulate Emission from Grinders**

**Source Name: Industrial Steel Construction, Inc**
**Source Location: 86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number: T089-36385-00161**
**Significant Source Modification Number: 089-36435-00161**
**Permit Reviewer: Donald McQuigg**
**Date: October 14, 2015**

Electric Arc Welding Stick

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

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

EU # 11 (Sweep Grinder)

| Unit ID | Max. Area of Steel Swept (sq ft/hr) | Max. lb PM/ft sq of Area Swept* | Hours of opreation/ yr | Uncontrolled PM/PM10 (tons/yr) |
|---|---|---|---|---|
| EU # 11 | 75 | 0.0925 | 8,760 | 30.4 |

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

EU #11 (3 Slab Grinders)

| Unit ID | Max. Grind Capacity (ton/yr) | PM emitted from Grinding operation (%)* | Uncontrolled $PM/PM_{10}/PM_{2.5}$ (tons/yr) | Limited Throughput (tons/yr) | Limited $PM/PM_{10}/PM_{2.5}$ Emissions (tons/yr) |
|---|---|---|---|---|---|
| EU #11 | 613,200 | 0.0493 | 302.3 | 200,000 | 98.60 |

**Methodology**
Uncontrolled PM/PM10 emissions(tons/yr) = Max.Grind Capacity (ton/yr) x PM emitted from grinding operation in %
* Provided by the source

**Appendix A: Emissions Calculations**

**Potential Particulate and HAP Emissions from Thermal Cutting**

**Source Name:** **Industrial Steel Construction, Inc**
**Source Location:** **86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number:** **T089-36385-00161**
**Significant Source Modification Number:** **089-36435-00161**
**Permit Reviewer:** **Donald McQuigg**
**Date:** **October 14, 2015**

**EU # 13 (Cutting Torches)**

| | Number of Stations | Max. Metal Thickness Cut (in.) | Max. Metal Cutting Rate (in./minute) | EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)** | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| FLAME CUTTING | | | | $PM=PM_{10=}PM_{2.5}$ | Mn | Ni | Cr | $PM=PM_{10}=PM_{2.5}$ | Mn | Ni | Cr | |
| Oxyacetylene | 40 | 3.375 | 7 | 0.1622 | 0.0005 | 0.0001 | 0.0003 | 9.197 | 0.028 | 0.006 | 0.017 | 0.051 |
| Oxymethane | 5 | 9.1 | 3 | 0.0815 | 0.0002 | -- | 0.0002 | 0.667 | 0.002 | 0.000 | 0.002 | 0.003 |
| DB Plasma** | 2 | 12 | 9.4 | 0.0039 | | | | 0.004 | 0.000 | 0.000 | 0.000 | 0.000 |
| **EMISSION TOTALS** | | | | | | | | | | | | |
| Potential Emissions, lbs/hr | | | | | | | | 9.87 | 0.03 | 0.01 | 0.02 | 0.05 |
| Potential Emissions, tons/year | | | | | | | | **43.22** | **0.13** | **0.02** | **0.08** | **0.24** |

**METHODOLOGY**

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

Plasma cutting emissions (lb/hr) = (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

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 (lbs/hr) x 8,760 hrs/year x 1 ton/2,000 lbs.

**Appendix A: Emissions Calculations**
**Potential Emissions from ARC Welding**

**Source Name:** Industrial Steel Construction, Inc
**Source Location:** 86 North Bridge Street, Gary, IN 46404
**Part 70 Operating Permit Renewal Number:** T089-36385-00161
**Significant Source Modification Number:** 089-36435-00161
**Permit Reviewer:** Donald McQuigg
**Date:** October 14, 2015

**Surmerged Arc Welders (EU #17)**

| PROCESS | Number of Stations | Max. electrode consumption per station (lbs/hr) | | EMISSION FACTORS* (lb pollutant/lb electrode) | | | | EMISSIONS (lbs/hr) | | | | HAPS (lbs/hr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| WELDING | | | | $PM=PM_{10}=PM_{2.5}$ | Mn | Ni | Cr | $PM=PM_{10}=PM_{2.5}$ | Mn | Ni | Cr | |
| Submerged Arc | 12 | 4.2 | | 0.036 | 0.011 | 0.000 | 0.000 | 1.814 | 0.554 | 0.000 | 0.000 | 0.554 |
| EMISSION TOTALS | | | | | | | | | | | | |
| Potential Emissions, lbs/hr | | | | | | | | 1.81 | | | | 0.55 |
| Potential Emissions, tons/year | | | | | | | | 7.95 | | | | 2.43 |

**METHODOLOGY**

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.
Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm th
Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)
Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day
Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2

**Electric Arc Stick Welding (EU#9)**

| Unit ID | No of Welders | Max. Weld Rate (rod/min) | Max. Rod (weight (oz) | PM/PM10/PM2.5 (lb/1000lb of rod) | PM/PM10/PM2.5 (tons/yr) |
|---|---|---|---|---|---|
| EU #9 | 12 | 0.718 | 4.6 | 18.4 | 12.0 |

**Methodology**

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

**Appendix A: Emissions Calculations**
**VOC and Particulate**
**From Surface Coating Operations EU #15, EU #22, and EU #25**

**Source Name:** Industrial Steel Construction, Inc
**Source Location:** 86 North Bridge Street, Gary, IN 46404
**Part 70 Operating Permit Renewal Number:** T089-36385-00161
**Significant Source Modification Number:** 089-36435-00161
**Permit Reviewer:** Donald McQuigg
**Date:** October 14, 2015

| Emissions Unit[1] /Material | Density (lb/gal) | Weight % Volatile (H20 & Organics) | Weight % Water | Weight % Organics | Volume % Water | Volume % Non-Volatiles (solids) | Gal of Mat. (gal/unit) | Maximum (unit/hour) | Pounds VOC per gallon of coating less water | Pounds VOC per gallon of coating | Potential VOC (lb/hr) | Potential VOC (ton/yr) | Particulate Potential Uncontrolled (ton/yr) | Particulate Potential Controlled[1] (ton/yr) | Transfer Efficiency[2] |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| EU #15 Solvent | 7.40 | 16.0% | 0% | 16.0% | 0% | 0% | 3.760 | 1 | 1.18 | 1.18 | 4.45 | 19.50 | 4.09 | 4.09 | 96% |
| EU #22 Paint | 7.40 | 47.3% | 0% | 47.3% | 0% | 0% | 18.800 | 1 | 3.50 | 3.50 | 65.80 | 288.22 | 12.85 | 12.85 | 96% |
| EU #25 Paint | 7.40 | 47.3% | 0% | 47.3% | 0% | 0% | 18.800 | 1 | 3.50 | 3.50 | 65.80 | 288.22 | 12.85 | 0.13 | 96% |
| | | | | | | | | | | | | **595.94** | **29.78** | | |

[1] There are no particulate controls for EU #15 and EU #22. Particulate emissions from EU #25 is controlled by general ventilation baghouse #24.

Particulate control efficiency = 99.0%

[2] The high transfer efficiency is for hand spraying of large parts.

**METHODOLOGY**

Particulate Potential (tons/yr) = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer Efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Potential VOC (tons/yr) = (pounds VOC/ Gallon coating) x (gal. of Material/unit) x Max. units/hr) x (8760 hr/yr) x (1 ton/2000lb)
Controlled Emissions (ton/yr) = Uncontrolled Potential to Emit (ton/yr) x (1 - Control Efficiency %)
Assume $PM_{10}$ = $PM_{2.5}$ = PM

**Appendix A: Emission Calculations**
**HAP Emission Calculations**

**Source Name:** **Industrial Steel Construction, Inc**
**Source Location:** **86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number:** **T089-36385-00161**
**Significant Source Modification Number:** **089-36435-00161**
**Permit Reviewer:** **Donald McQuigg**
**Date:** **October 14, 2015**

| Material | Density (Lb/Gal) | Gallons of Material (gal/unit) | Maximum (unit/hour) | Weight % Xylene | Weight % Toluene | Weight % Benzene | Weight % Hexane | Weight % Glycol Ethers | Xylene Emissions (ton/yr) | Toluene Emissions (ton/yr) | Benzene Emissions (ton/yr) | Hexane Emissions (ton/yr) | Glycol Ethers Emissions (ton/yr) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Paint Booths** | | | | | | | | | | | | | |
| GTA 840 Cleaner | 6.93 | 0.10000 | 1.000 | 50.00% | 20.00% | 20.00% | 0.00% | 20.00% | 1.52 | 0.61 | 0.61 | 0.00 | 0.61 |
| #997 Nippe Ceramo Primer | 7.47 | 1.96000 | 1.000 | 0.00% | 10.00% | 1.00% | 10.00% | 5.00% | 0.00 | 6.41 | 0.64 | 6.41 | 3.21 |
| | | | | | | | | | | | | | |

**Highest Single HAP:** 6.41 (hexane)
**Total HAPs:** 20.01

**METHODOLOGY**

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

**Appendix A: Emissions Calculations**
**Potential Particulate Emissions from**
**Metalizing Surface Coating Operation EU #26**

**Source Name:** Industrial Steel Construction, Inc
**Source Location:** 86 North Bridge Street, Gary, IN 46404
**Part 70 Operating Permit Renewal Number:** T089-36385-00161
**Significant Source Modification Number:** 089-36435-00161
**Permit Reviewer:** Donald McQuigg
**Date:** October 14, 2015

**1. Metalizing Surface Coating Operation (EU#26), Building A**

| | | | | | Uncontrolled PTE (tons/yr) | | | Controlled PTE (tons/yr) | | | Limiteded PTE (tons/yr) | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Emission Unit | Max Rate ($ft^2$ metal/yr) | Wire Usage Rate (lb wire/ $ft^2$ metal) | Emission Factor (lb PM / lb wire) | Baghouse Control Efficiency | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ | PM | $PM_{10}$ | $PM_{2.5}$ |
| EU #26 | 1.022E+07 | 0.5 | 0.0355 | 98% | 90.70 | 90.70 | 90.70 | 1.81 | 1.81 | 1.81 | 3.07 | 3.07 | 3.07 |

**Methodology:**
Uncontrolled Particulate PTE (tons/yr) = Max Rate ($ft^2$ metal/yr) * Wire Usage Rate (lb wire/$ft^2$ metal) * Emission Factor (lb PM/lb wire) * (1 ton/2000 lbs)
Controlled Particulate PTE (tons/yr) = Max Rate ($ft^2$ metal/yr) * Wire Usage Rate (lb wire/$ft^2$ metal) * Emission Factor (lb PM/lb wire) * (1-Control Efficiency) * (1 ton/2000 lbs)
Assumes $PM_{10}$ = $PM_{2.5}$ = PM

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

**Source Name: Industrial Steel Construction, Inc**
**Source Location: 86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number: T089-36385-00161**
**Significant Source Modification Number: 089-36435-00161**
**Permit Reviewer: Donald McQuigg**
**Date: October 14, 2015**

| Unit | MMBtu/hr |
|---|---|
| Boiler (EU#7) | 1.8 |
| 61 Space Heaters | 14.2 |
| 4 Torches (EU#14) | 1.2 |
| 1 Cure Oven | 1.4 |
| 1 Preheat Oven | 2.58 |
| **Total** | **21.18** |

| Heat Input Capacity MMBtu/hr | MMCF/yr |
|---|---|
| 21.18 | 185.5 |

| | Pollutant | | | | | | |
|---|---|---|---|---|---|---|---|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/MMCF | 1.9 | 7.6 | 7.6 | 0.6 | 100<br>**see below | 5.5 | 84 |
| Potential Emission in tons/yr | 0.18 | 0.71 | 0.71 | 0.06 | 9.28 | 0.51 | 7.79 |

*PM emission factor is filterable PM only. PM10 and PM2.5 emission factors are filterable and condensable PM10 and PM2.5 combined, respectively.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

| | HAPs - Organics | | | | |
|---|---|---|---|---|---|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 |
| Potential Emission in tons/yr | 1.948E-04 | 1.113E-04 | 6.958E-03 | 1.670E-01 | 3.154E-04 |

| | HAPs - Metals | | | | |
|---|---|---|---|---|---|
| | Lead | Cadmium | Chromium | Manganese | Nickel |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 |
| Potential Emission in tons/yr | 4.638E-05 | 1.020E-04 | 1.299E-04 | 3.525E-05 | 1.948E-04 |

| | | |
|---|---|---|
| **Total HAPs (tons/yr) =** | **0.18** | |
| **Worst Single HAP (tons/yr) =** | **0.17** | **Hexane** |

**Methodology**
All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations**
**Potential to Emit VOC/HAP from the Degreasing Operation (EU#12)**

**Source Name:** **Industrial Steel Construction, Inc**
**Source Location:** **86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number:** **T089-36385-00161**
**Significant Source Modification Number:** **089-36435-00161**
**Permit Reviewer:** **Donald McQuigg**
**Date:** **October 14, 2015**

## PTE VOC from Degreasing

| Emission Unit | Solvent Throughput (gal/yr) | Solvent Density (lb/gal) | Emission Factor (lb/lb) | Potential VOC (tons/year) |
|---|---|---|---|---|
| Degreasing Units (EU#12) | 725 | 6.7 | 1.00 | 2.4 |

## PTE HAPs from Degreasing

| | HAP Emission Factor (lb HAP/lb solvent) | Solvent Throughput (gal/yr) | Control Efficiency | Potential HAPs (tons/yr) |
|---|---|---|---|---|
| Tetrachloroethene | 0.20 | 725 | 0.00% | 0.005 |

**Methodology:**
VOC Emissions (ton/yr) = Solvent Throughput (gal/yr) * Solvent Density (lb/gal) * 1 ton/2000 lbs
HAP Emissions (ton/yr) = Solvent Throughput (gal/yr) * Solvent Density (lb/gal) * HAP Emission Factor (lb HAP/lb solvent) * 1 ton/2000 lbs

**Appendix A: Emissions Calculations**
**Fugitive Particulate Emissions from Paved Roadways**

**Source Name: Industrial Steel Construction, Inc**
**Source Location: 86 North Bridge Street, Gary, IN 46404**
**Part 70 Operating Permit Renewal Number: T089-36385-00161**
**Significant Source Modification Number: 089-36435-00161**
**Permit Reviewer: Donald McQuigg**
**Date: October 14, 2015**

$E_{ext}$ = $[k(sL)^{0.91}*(W)1.02]$ (1-P/4N)

| PM 2.5 | | | | PM 10 | | | | PM | | | | Annual PM emissions | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 0.246707842 | lbs/VMT | | | 1.005106022 | lbs/VMT | | | 5.025530111 | lbs/VMT | | | | | |
| | | | | | | | | | | | | **PM 2.5 (1.32)** | **475.46** | **lbs** |
| | | | | | | | | | | | | **PM 10(1.32)** | **1937.04** | **lbs** |
| k= | 0.00054 | lb/VMT | | k= | 0.0022 | lb/VMT | | k= | 0.011 | lb/VMT | | **PM (1.32)** | **9685.20** | **lbs** |
| sL= | 0.015 | $g/m^2$ | | sL= | 0.015 | $g/m^2$ | | sL= | 0.015 | $g/m^2$ | | | | |
| | 3.3075E-05 | lb/ | 3.86102E-07 $m^2$ | | 3.3075E-05 | lb/ | 3.86102E-07 $m^2$ | | 3.3075E-05 | lb/ | 3.86102E-07 $m^2$ | | | |
| | 85.6638697 | lb/ $mi^2$ | | | 85.6638697 | lb/ $mi^2$ | | | 85.6638697 | lb/ $mi^2$ | | **PM 2.5 (1.32)** | **0.24** | **tons** |
| W= | 8.375 | tons | | W= | 8.375 | tons | | W= | 8.375 | tons | | **PM 10(1.32)** | **0.97** | **tons** |
| N= | 365 | days | | N= | 365 | days | | N= | 365 | days | | **PM (1.32)** | **4.84** | **tons** |
| P= | 130 | days | | P= | 130 | days | | P= | 130 | days | | | | |

where:
$E_{ext}$ = Annual emission factor
k= article size multiplier for particles size range and units of interest
sL= road surface silt loading lb/mi
W= average weight (tons) of the vehicles traveling the road
N= number of days in year (365)
P= number of "wet" days with at least 0.01 in. of precipitation during the year

| Annual Mileage Calculation | | |
|---|---|---|
| | 1.32 | miles roadway |
| | 4 | trips/day |
| | 1460 | trips/year |

Vehicle Type: Passenger Vehicles

| Percent | Average Weight (tons) |
|---|---|
| 0.75 | 2 |
| 1.5 | |

Vehicle Type: Trucks Hauling Bridge Girders

| Percent | Average Weight (tons) |
|---|---|
| 0.125 | 40 |
| 5 | |

Vehicle Type: Empty Truck

| Percent | Average Weight (tons) |
|---|---|
| 0.125 | 15 |
| 1.875 | |

| | | |
|---|---|---|
| W= | 8.375 | tons |
| sL= | 0.015 | $g/m^2$ |

W =average weight (tons) of the vehicles traveling the roads

sL = Silt loading default value for limited access roadways

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
*We Protect Hoosiers and Our Environment.*
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

**Michael R. Pence**
*Governor*

**Carol S. Comer**
*Commissioner*

January 14, 2016

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

Re: Public Notice
Industrial Steel Construction, Inc.
Permit Level: Title V Operating Permit Renewal and Title V Significant Source Modification
Permit Number: 089-36385-00161 and 089-36435-00161

Dear Mr. Moore:

Enclosed is a copy of your draft Title V Operating Permit Renewal and Title V Significant Source Modification, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana publish the abbreviated version of the public notice no later than January 18, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Gary Public Library – Brunswick Branch, 4030 West 5th Avenue in Gary, Indiana. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Donald McQuigg, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-4240 or dial (317) 234-4240.

Sincerely,

*Vivian Haun*

Vivian Haun
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 8/27/2015

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**ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

January 13, 2016

The Post Tribune
1433 E. 83rd Avenue
Merrillville, IN 46410

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Industrial Steel Construction, Inc., Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than January 18, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and
Title V Operating Permit Renewal
Permit Number: 089-36435-00161 and 089-36385-00161

Enclosure
PN Newspaper.dot 8/27/2015

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**Carol S. Comer**
*Commissioner*

**ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING**

January 13, 2016

The Times
601 West 45th Avenue
Munster, IN 46321

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Industrial Steel Construction, Inc., Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than January 18, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

**To ensure proper payment, please reference account # 100174737.**

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Vivian Haun at 800-451-6027 and ask for extension 3-6878 or dial 317-233-6878.

Sincerely,

*Vivian Haun*

Vivian Haun
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Source Modification and
Title V Operating Permit Renewal
Permit Number: 089-36435-00161 and 089-36385-00161

Enclosure
PN Newspaper.dot 8/27/2015

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**
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*Governor*

**Carol S. Comer**
*Commissioner*

January 14, 2016

To: Gary Public Library – Brunswick Branch

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

**Applicant Name: Industrial Steel Construction, Inc.**
**Permit Number: 089-36385-00161 and 089-36435-00161**

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

If you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 8/27/2015

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*Commissioner*

# Notice of Public Comment

**January 14, 2016**
**Industrial Steel Construction, Inc.**
**089-36385-00161 and 089-36435-00161**

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

**Please Note:** *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 8/27/2015

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*Governor*

**Carol S. Comer**
*Commissioner*

# AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
# DRAFT INDIANA AIR PERMIT

January 14, 2016

A 30-day public comment period has been initiated for:

**Permit Number:** **089-36385-00161 and 089-36435-00161**
**Applicant Name:** **Industrial Steel Construction, Inc.**
**Location:** **Gary, Lake County, Indiana**

The public notice, draft permit and technical support documents can be accessed via the **IDEM Air Permits Online** site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

Indiana Department of Environmental Management
Office of Air Quality, Permits Branch
100 North Senate Avenue
Indianapolis, IN 46204

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.

Affected States Notification.dot 8/27/2015

# Mail Code 61-53

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|---|---|---|---|---|
| IDEM Staff | VHAUN 1/14/2016<br>Industrial Steel Construction, Inc. 089-36385 and 36435-00161 DRAFT | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Daniel E Moore Industrial Steel Construction, Inc. 86 N Bridge St Gary IN 46404 (Source CAATS) | | | | | | | | | |
| 2 | | East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 *(Local Official)* | | | | | | | | | |
| 3 | | Gary Mayors Office 401 Broadway # 203 Gary IN 46402 *(Local Official)* | | | | | | | | | |
| 4 | | Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 *(Health Department)* | | | | | | | | | |
| 5 | | WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 *(Affected Party)* | | | | | | | | | |
| 6 | | Shawn Sobocinski 5950 Old Porter Rd Aprt 306 Portage IN 46368-1558 *(Affected Party)* | | | | | | | | | |
| 7 | | Mark Coleman 8 Turret Rd. Portage IN 46368-1072 *(Affected Party)* | | | | | | | | | |
| 8 | | Mr. Chris Hernandez Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 *(Affected Party)* | | | | | | | | | |
| 9 | | Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 *(Affected Party)* | | | | | | | | | |
| 10 | | Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 *(Local Official)* | | | | | | | | | |
| 11 | | Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 *(Affected Party)* | | | | | | | | | |
| 12 | | Barbara G. Perez 506 Lilac Street East Chicago IN 46312 *(Affected Party)* | | | | | | | | | |
| 13 | | Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party) | | | | | | | | | |
| 14 | | Susan Grenzebach ST Environmental, LLC PO Box 2557 Chesterton IN 46034-2557 *(Consultant)* | | | | | | | | | |
| 15 | | Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 *(Affected Party)* | | | | | | | | | |

| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|---|---|---|---|
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FACSIMILIE OF PS Form 3877

# Mail Code 61-53

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|---|---|---|---|---|
| IDEM Staff | VHAUN 1/14/2016<br>Industrial Steel Construction, Inc. 089-36385 and 36435-00161 DRAFT | | | AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING |
| Name and address of Sender | ▶ | Indiana Department of Environmental Management<br>Office of Air Quality – Permits Branch<br>100 N. Senate<br>Indianapolis, IN 46204 | Type of Mail:<br>**CERTIFICATE OF MAILING ONLY** | |

| Line | Article Number | Name, Address, Street and Post Office Address | Postage | Handing Charges | Act. Value (If Registered) | Insured Value | Due Send if COD | R.R. Fee | S.D. Fee | S.H. Fee | Rest. Del. Fee<br>Remarks |
|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | | Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party) | | | | | | | | | |
| 2 | | Gary City Council 401 Broadway # 209 Gary IN 46402 *(Local Official)* | | | | | | | | | |
| 3 | | Peter Julovich City of Gary Dept. of Envrionmental Affairs 839 Broadway SuiteN206 Gary IN 46402 *(Local Official)* | | | | | | | | | |
| 4 | | Gary Public Library 4030 West 5th Avenue Gary IN 46406 *(Library)* | | | | | | | | | |
| 5 | | Mr. Larry Davis 268 South, 600 West Hebron IN 46341 *(Affected Party)* | | | | | | | | | |
| 6 | | Ryan Dave 939 Cornwallis Munster IN 46321 *(Affected Party)* | | | | | | | | | |
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| Total number of pieces Listed by Sender | Total number of Pieces Received at Post Office | Postmaster, Per (Name of Receiving employee) | The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is $50,000 per piece subject to a limit of $50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is $500. The maximum indemnity payable is $25,000 for registered mail, sent with optional postal insurance. See ***Domestic Mail Manual*** **R900, S913**, and **S921** for limitations of coverage on inured and COD mail. See ***International Mail Manual*** for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels. |
|---|---|---|---|
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