

**ENHANCED NEW SOURCE REVIEW (ENSR)  
OFFICE OF AIR MANAGEMENT**

**Vulcraft, A Division of Nucor Corporation  
6610 County Road 60  
St. Joe, Indiana 46785**

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-033-8994-00027	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a plant that fabricates metal joists, trusses and deckings used for the building construction industry.

Responsible Official: Mr. James Ronner  
Mailing Address: Vulcraft  
P. O. Box 1000  
St. Joe, Indiana 46785  
SIC Codes: 3441 & 3444  
County Location: DeKalb  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source, PSD Rules;  
Major Source, Part 70 Permit Program; and  
Major Source, Section 112 of the Clean Air Act

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

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

- (a) One (1) Deck Line roll coater 1, which is capable of coating 40 tons of steel deck per hour. This roll coater 1 will be installed in series with the existing Deck Line roll coater 2, and
- (b) One (1) Deck Line edge coater, which is capable of coating 40 tons of steel deck per hour.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is a major source, as defined in 326 IAC 2-7-1(22), and therefore, is a Title V source. A Part 70 permit (T033-6286-00027) has been issued to this source on December 23, 1997.

## SECTION B GENERAL CONSTRUCTION AND OPERATION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**Construction Conditions [326 IAC 2-1-3.4]**

**B.1 General Construction Conditions**

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- (a) The data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
- (b) This permit 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.

**B.2 Effective Date of the Permit [IC13-15-5-3]**

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

**B.3 Revocation of Permits [326 IAC 2-1-9(b)]**

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Pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit 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.

**B.4 Permit Review Rules [326 IAC 2]**

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Notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.5 First Time Operation Permit [326 IAC 2-1-4]**

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This document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) The Permittee shall receive an Administrative Amendment to the Part 70 permit (T033-6286-00027), that was issued on December 23, 1997 from the Chief of the Permit Branch that incorporates the facilities and conditions under this Enhanced New Source Review (ENSR).

- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-7-19 (Fees).

## **Operation Conditions**

### **B.6 General Operation Conditions**

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- (a) The data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- (b) The Permittee shall 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 (IC13-17) and the rules promulgated thereunder.

### **B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:

- (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
- (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.
- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

### **B.8 Transfer of Permit [326 IAC 2-1-6]**

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Pursuant to 326 IAC 2-1-6 (Transfer of Permits):

- (a) In the event that ownership of this metal joists, trusses and deckings fabrication used for the building construction industry is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
- (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
- (c) The OAM shall reserve the right to issue a new permit.

### **B.9 Permit Revocation [326 IAC 2-1-9]**

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Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.

- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

**B.10 Availability of Permit [326 IAC 2-1-3(I)]**

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Pursuant to 326 IAC 2-1-3(I), the Permittee shall maintain the applicable permit on the premises of the source and shall make this permit available for inspection by the IDEM, or other public official having jurisdiction.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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## Emission Limitation and Standards

### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

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The volatile organic compounds (VOC) input usage from this modification including the source's existing operations shall be limited to 249 tons per 365 day total rolled on a daily basis. Compliance with this condition shall render the 326 IAC 2-2, the Prevention of Significant Deterioration (PSD) and 40 CFR 52.21 not applicable.

### C.2 Opacity Limitations [326 IAC 5-1-2]

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Pursuant to 326 IAC 5-1-2 (Visible Emission Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), the visible emissions shall meet the following:

- (a) visible emissions shall not exceed an average of 40% opacity in 24 consecutive readings.
- (b) visible emissions shall not exceed 60% opacity for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period.

### C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

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

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

### C.5 Fugitive Dust Emissions [326 IAC 6-4]

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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.6 Operation of Equipment [326 IAC 2-7-6(6)]

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All air pollution control equipment listed in this permit shall be in placed or operated at all

times that the emission units vented to the control equipment are in operation, as described in Section D of this permit.

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

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Prior to the commencement of any demolition or renovation activities, the Permittee shall use an Indiana accredited asbestos inspector to inspect thoroughly the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos,

including Category I and Category II nonfriable asbestos containing material. The requirement that the inspector be accredited is federally enforceable.

## Testing Requirements

### C.8 Performance Testing [326 IAC 3-2.1]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedure), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, office of Air Management  
100 north Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

No later than thirty-five (35) days before the intended test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

## **Compliance Monitoring Requirements**

### **C.9 Compliance Monitoring**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee shall notify:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.

### **C.10 Maintenance of Monitoring Equipment**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

### **C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the requirements of this permit shall be performed, according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(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

(3) 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  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

(e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory 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) Indiana Accredited 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 Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Corrective Action and Response Steps**

#### **C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 18, 1996.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM,, 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]

### **Record Keeping and Reporting Requirements**

#### **C.14 Annual Emission Reporting [326 IAC 2-6]**

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That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

#### **C.15 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing. All observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down

or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

#### C.16 General Record Keeping Requirements

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location and available within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They may be stored elsewhere for the remaining two (2) years providing they are made available within thirty (30) days after written request.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

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

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quality Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The Report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (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, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) an excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) an emergency as defined in 326 IAC 2-7-1(12); or
  - (3) failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.
- A permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

## Stratospheric Ozone Protection

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

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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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY CONDITIONS

- |     |  |
|-----|--|
| (a) | One (1) Deck Line roll coater 1, which is capable of coating 40 tons of steel deck per hour. This roll coater 1 will be installed in series with the existing Deck Line roll coater 2, and |
| (b) | One (1) Deck Line edge coater, which is capable of coating 40 tons of steel deck per hour.   |

## Emissions Limitation and Standards

D.1.1 Volatile Organic Compounds (Coil Coating Operations) [326 IAC 8-2-4]

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Pursuant to 326 IAC 8-2-4 (Coil Coating Operations), the volatile organic compound (VOC) content of coatings applied to any flat metal sheets or strips that are delivered in rolls or coils shall be limited to 2.6 pounds VOC per gallon of coating less water delivered to the applicator.

### Compliance Determination Requirements

#### D.1.2 Volatile Organic Compounds (VOC)

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Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

#### D.1.3 Daily Volume-Weighted Average [326 IAC 8-2-4]

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The Permittee shall determine compliance with the VOC limit in condition D.1.1, using the following equation for determining the daily volume-weighted average emissions of VOC's in pounds/ gallon of coating less water:

$$\text{lb VOC/gal less water} = 3 \text{ coats} \left[ \text{density, lb/gal} * \text{wt. \% organics} * \text{gal of mat'l., gal/unit} / \left[ 1 - \% \text{ vol water} * \frac{\text{density coat, lb/gal}}{\text{density water, lb/gal}} \right] \right]$$

-----  
[3 coats, gal/unit]

### Record Keeping and Reporting Requirements

#### D.1.4 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.1 the Permitted shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
- (1) The amount of VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each calendar day;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each calendar day and month;
  - (6) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

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A quarterly summary of the information to document compliance with Condition C.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit,

using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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

**Quarterly Summary**

Source Name:	Vulcraft, A Division of Nucor Corporation
Source Address:	6610 County Road 60, St. Joe, Indiana 46785
Construction Permit No.:	CP033-8994-00027
Facility:	Sourcewide, including the Deck Line's modification
Paramete:	VOC

Limit: 249 tons per 365 day total rolled on a daily basis

Day	Tons This Day	Tons Past 364 Days	Tons Past 365 Days	Day	Tons This Day	Tons Past 364 Days	Tons Past 365 Days
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				<b>no. of deviations</b>			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
 Title/Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_



## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for New Construction and Operation

#### Source Background and Description

Source Name: Vulcraft, A Division of Nucor Corporation  
 Source Location: 6610 County Road 60, St. Joe, Indiana 46785  
 County: DeKalb  
 Construction Permit No.: CP-033-8994-00027  
 SIC Code: 3441  
 Permit Reviewer: Aida De Guzman

The Office of Air Management (OAM) has reviewed an application from Vulcraft, A Division of Nucor Corporation relating to the construction and operation of the following new equipment:

- (a) One (1) Deck Line roll coater 1, which is capable of coating 554 pounds of coiled steel per hour. This roll coater 1 will be installed in series with the existing Deck Line roll coater 2, and
- (b) One (1) Deck Line edge coater, which is capable of coating 11 pounds of coiled steel per hour.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
D-E6-1	Roll coater 1	50	24	8,500	350
D-E6-3	Roll coater 2	50	24	8,500	350

#### Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, 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 September 17, 1997, with additional information received on December 15, 1997.

#### Emissions Calculations

- (a) Painting Operation: See page 1 of 1 TSD Appendix A (Emissions Calculation Spreadsheets) for detailed calculations.

- (b) Hazardous Air Pollutants:  
 Glycol Ether = 1.3 gal/unit \* 40 units/hr \* 2% \* 10.65 lb/gal \* 8760 hr/yr \* ton/2000  
 = 48.5 ton/yr \* 2 roll coaters  
 = 97 tons/yr

**Total Potential and Allowable Emissions**

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	0.0	0.0
Particulate Matter (PM10)	0.0	0.0
Sulfur Dioxide (SO <sub>2</sub> )	0.0	0.0
Volatile Organic Compounds (VOC)	238.9	238.9
Carbon Monoxide (CO)	0.0	0.0
Nitrogen Oxides (NO <sub>x</sub> )	0.0	0.0
Single Hazardous Air Pollutant (HAP)	97.0	97.0
Combination of HAPs	97.0	97.0

- (a) Allowable emissions (as defined in the Indiana Rule) of volatile organic compounds (VOC) are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.
- (b) Allowable emissions (as defined in the Indiana Rule) of a single hazardous air pollutant (HAP) are greater than 10 tons per year and/or the allowable emissions of any combination of the HAPs are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, a construction permit is required.

**County Attainment Status**

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. DeKalb County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) DeKalb County has been classified as attainment or unclassifiable for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

**Source Status**

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on the proposed Part 70 permit T 033-6286-00027 condition limit):

Pollutant	Emissions (ton/yr)
PM	0.0
PM10	0.0
SO <sub>2</sub>	0.0
VOC	249.0
CO	0.0
NO <sub>x</sub>	0.0

This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

**Proposed Modification**

PTE from the **proposed modification and existing operation** (based on 8,760 hours of operation per year at rated capacity including enforceable emission control and production limit, where applicable):

Pollutant	PM (ton/yr)	PM10 (ton/yr)	SO <sub>2</sub> (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO <sub>x</sub> (ton/yr)
Proposed Modification	0.0	0.0	0.0	249.0	0.0	0.0
PSD or Offset Significant Level	250	250	250	250	250	250

The proposed Deck Line modification has a total potential emissions of 238.9 tons of VOC per year. However, the source has requested to include this modification in the sourcewide limit of 249 tons per year, as proposed in the Part 70 permit T 033-6286-00027.

Therefore, this modification to an existing minor stationary source is not major because the total VOC emission does not increase above 249 tons per year sourcewide. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

**Part 70 Permit Determination**

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T033-6286-00027) application on July 18, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

**Federal Rule Applicability**

- (a) New Source Performance Standards  
40 CFR Part 60.460, Subpart TT- Standards of Performance for Metal Coil Surface Coating.
- (1) 40 CFR Part 60.462(a)- Standard for Volatile Organic Compounds (VOC)  
The owner or operator of the Deck Line, shall not caused any VOC discharged into the atmosphere of more than 0.28 kilogram VOC per liter ( 2.3 pounds per gallon) of coating solids applied for each calendar month.
- (2) (a) 40 CFR § 60.463(b)- Performance Test -  
The owner or operator of the Deck Line shall conduct an initial performance test(s) within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial start up of such facility and such other times as maybe required by the Administrator under section 114 of the Act, the owner or operator of such facility shall conduct performance test and furnish the Administrator a written report of such performance test(s).
- (b) 40 CFR § 60.463(c) - Compliance Provisions -  
The owner shall use the following procedure for determining monthly volume-weighted average emission of VOC's in kg/l of coating solids as applied:
- $$M_o + M_d = 3 \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + 3 \sum_{j=1}^m L_{dj} D_{dj}$$
- Where:
- $M_o$  = Mass of VOC's in coatings consumed, as received in kilogram (kg)
  - $M_d$  = Mass of VOC-solvent added to the coatings, in kg
  - $L_c$  = the volume of each coating consumed, as received in liters
  - $L_d$  = the volume of each VOC-solvent added to the coatings in liters (l)
  - $W_o$  = the proportion of VOC's in each coating, as received (fraction by weight)
  - $D_d$  = density of each VOC-solvent added to the coatings (kg/l)
  - $3 \sum_{j=1}^m L_{dj} D_{dj}$  = will be 0 if no VOC solvent is added to the coatings, as received
  - $n$  = the number of different coatings used during calendar month, and
  - $m$  = the number of different VOC solvents added to coatings used during the calendar month.
- (c) 40 CFR § 60.463(a)(1)- Compliance Provisions  
The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coatings or by an

analysis of each coating, as received using reference Method 24. The Administrator may require the owner or operator who uses formulations data supplied by the manufacturer of the coatings to determine the VOC content of coating using Reference Method 24, or an equivalent or an alternative method.

- (d) 40 CFR § 60.464 - Monitoring of Emissions And operations. Compliance with the limit of 0.28 kg of VOC per liter of coating solids, the owner or operator of the Deck Line shall compute and record the average VOC content of coatings applied during each calendar month, using the above equation.

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

$$\begin{aligned} &= (140,845 \text{ l/mo} * 1.27 \text{ kg/l} * 0.048) + (48.7 \text{ l/mo} * 0.85 \text{ kg/l}) + \\ &\quad (140,845 \text{ l/mo} * 1.27 \text{ kg/l} * 0.048) + (48.7 \text{ l/mo} * 0.85 \text{ kg/l}) \\ &+ (3283 \text{ l/mo} * 1.1 \text{ kg/l} * 0.1156) + (1.12 \text{ gal/mo} * 1.1 \text{ kg/l}) \\ &= 17,673 \text{ kg/mo} \end{aligned}$$

$$\begin{aligned} L_c &= 1.3 \text{ gal/unit} * 40 \text{ units/hr} * 24 \text{ hr/day} * 30 \text{ day/mo} \\ &= 37,440 \text{ gal/mo} * 3.8 \text{ l/gal} \\ &= 140,845 \text{ liters/mo (white coat from roll coater 1)} \\ &= 140,845 \text{ l/mo (white coat from roll coater 2)} \\ &= 0.03 \text{ gal/unit} * 40 \text{ units/hr} * 24 \text{ hr/day} * 30 \text{ day/mo} \\ &= 3293 \text{ l/mo (edger)} \end{aligned}$$

$$\begin{aligned} D_c &= 10.65 \text{ lb/gal} * \text{gal}/3.8 \text{ l} * \text{kg}/2.2 \text{ lb} \\ &= 1.27 \text{ kg/l (white coat)} \\ &= 9.23 \text{ lb/gal} * \text{gal}/3.8 \text{ l} * \text{kg}/2.2 \text{ lb} \\ &= 1.1 \text{ kg/l (edger coat)} \end{aligned}$$

$$\begin{aligned} L_d &= 0.0013 \text{ gal solvent/gal coating} * 36,440 \text{ gal/mo} \\ &= 48.7 \text{ l/mo (white coat)} \\ &= 0.0013 \text{ gal solvent/gal coating} * 864 \text{ gal edger/mo} \\ &= 1.12 \text{ gal/mo (edger)} \end{aligned}$$

$$\begin{aligned} D_d &= 7.13 \text{ lb/gal} * \text{gal}/3.8 \text{ l} * \text{kg}/2.2 \text{ lb} \\ &= 0.85 \text{ kg/l (white coat)} \\ &= 9.23 \text{ lb/gal} * \text{gal}/3.8 \text{ l} * \text{kg}/2.2 \text{ lb} \\ &= 1.1 \text{ kg/l (edger)} \end{aligned}$$

$$W_o = 0.1156 \text{ (edger)} \\ = 0.048 \text{ (white coat)}$$

$$L_s = \sum_{i=1}^n V_{si} L_{ci} \quad \text{(equation 2)}$$

$L_s$  = total volume of solids used in a calendar month

$$L_s = (0.4294 * 140,845 \text{ l/mo}) + (0.4294 * 140,845 \text{ l/mo}) + (0.2361 * 3283 \text{ l/mo}) \\ = 121,789 \text{ l/mo}$$

$$G = \frac{M_o + M_d}{L_s} \quad \text{(equation 3)}$$

$G$  = volume weighted average mass of VOC in coatings consumed in a calendar month per unit volume of coating solids applied, kg/l

$$G = 17,673 \text{ kg/mo} / 121,178 \text{ l/mo} \\ = 0.15 \text{ kg VOC/liter solids} \\ = 1.25 \text{ pounds VOC per gallon solids}$$

The Deck line is in compliance with this NSPS, since the volume weighted average mass of VOC in coatings per unit volume of coating solids does not exceed the allowable of 0.28 kg/l solids, (2.3 pounds VOC per gallon solids).

- (b) National Emission Standards for Hazardous Air Pollutants, (NESHAPs, 40 CFR 63)  
There are no NESHAPs applicable to this facility.

### State Rule Applicability

#### 326 IAC 2-6 (Emission Reporting)

This facility is subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr 100 tons/yr of VOC and it is a Title V source. Pursuant to this rule, the owner/operator of this facility must annually submit an emission statement of the facility. The annual statement must be received by July 1 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

#### 326 IAC 8-2-4 (Surface Coating Emission Limitation: Coil Coating Operations)

This rule mandates a VOC emission limit of 2.6 pounds per gallon of coating less water. The Deck Line is in compliance with this rule, since all the coatings used do not emit above the limit of 2.6 pounds per gallon less water (see page 1 of 1 TSD Appendix A for emissions calculations)

#### 326 IAC 2-1-3.4 (New Source Toxic Control)

Although the new Deck Line roll coater emits single HAP emissions at a major level, it is not subject to this rule because it does not produce a final or intermediate product by itself, it does

not operate independently from the existing equipment and structures, and it does not constitute a reconstruction because the fixed capital cost of the new component is less than 50% of the fixed capital costs that would be required to construct a comparable process or production unit. The fixed capital cost for the proposed modification are less than 1.8 million dollars, while those for a comparable Deck Line are about 10 million dollars.

### Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This modification will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act. The concentrations of these air toxics were modeled and found to be (in worst case possible) as follows: The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA). The Office of Air Management (OAM) does not have at this time any specific statutory or regulatory authority over these substances.

Air Toxic	Emission Rate (lb/hr)	Modeled Concentration (Fg/m <sup>3</sup> )	OSHA PEL
Glycol Ether	22.1		None

- (b) See page 2 of this TSD for detailed air toxic calculations.

### Conclusion

The construction of this Deck Line modification will be subject to the conditions of the attached proposed **Construction Permit No. CP-033-8994, PIt ID -033-00027.**

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

Company Name: Vulcraft, A Division of Nucor Corporation  
 Address City IN Zip: 6610 County Rd. 60, St. Joe, IN 46785  
 CP: 033-8994  
 Pit ID: 033-00027  
 Reviewer: Aida De Guzman  
 Date: 11/12/97

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organic	Volume Water	Volume % Non-Vol (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 pound per hour	Potential VOC pound per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency	
<b>Coater 2</b>																	
82607 white	10.7	45.66%	40.8%	4.8%	0.0%	42.96%	1.30000	40.000	0.51	0.51	26.64	639.31	116.67	0.00	1.19	100%	
<b>Coater 2</b>																	
82607 white	10.7	45.66%	40.9%	4.8%	0.0%	42.96%	1.30000	40.000	0.51	0.51	26.71	640.97	116.67	0.00	1.20	100%	
<b>Edge Coater</b>																	
SP-10113-2	9.2	67.02%	55.5%	11.6%	61.5%	23.61%	0.03000	40.000	2.77	1.07	1.28	30.73	5.61	4.00	4.52	75%	
<b>State Potential Emissions</b>			Add worst case coating to all solvents											238.95	4.00		
METHODOLOGY																	
Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)																	
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)																	
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)																	
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)																	
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)																	
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)																	
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)																	
Total = Worst Coating + Sum of all solvents used																	

## Indiana Department of Environmental Management Office of Air Management

### Addendum to the Technical Support Document for New Construction and Operation

Source Name: Vulcraft, A Division of Nucor Corporation  
Source Location: 6610 County Road 60, St. Joe, Indiana 46785  
County: DeKalb  
Construction Permit No.: CP-033-8994-00027  
SIC Code: 3441  
Permit Reviewer: Aida De Guzman

On January 3, 1993, the Office of Air Management (OAM) had a notice published in the Auburn Evening Star, Auburn, Indiana, stating that Vulcraft, A Division of Nucor Corporation had applied for a construction permit to construct and operate one (1) Deck Line roll coater 1, which is capable of coating 40 tons of coiled steel per hour. This roll coater 1 will be installed in series with the existing Deck Line roll coater 2, and one (1) Deck Line edge coater, which is capable of coating 40 tons of coiled steel per hour. The notice also stated that OAM proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 2, 1998, Vulcraft, submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows:

- Comment 1: Section A.2, the capacities for the Deck Line roll coater and Edge coater are incorrect. The production capacity of the Deck Line is 40 tons of coiled metal per hour.
- Response 1: Section A.2 will be revised to reflect this change. The capacity change will not result in the revision of the emission calculations, since 40 tons/hour was utilized in the calculations.
- Comment 2: Operation Condition B.6, the provisions of 40 CFR Part 60, Subpart TT (NSPS - Standards of Performance for Metal Coil Surface Coating) do not apply to the proposed modification to the Deck Line. This subpart applies to coil coating lines constructed, modified or reconstructed after January 5, 1981. The proposed changes do not constitute a "modification" as defined in 40 CFR 60.14, because they do not result in an increase in emissions. They are not "reconstruction" either, because the fixed capital cost of the new component is less than 50 percent of the fixed capital cost that would be required to construct a comparable new facility. The fixed capital costs for proposed modification are less than \$1.8 million, while those of a comparable new Deck Line are about \$10 million.
- Response 2: The changes to the Deck Line will have a potential VOC emissions of 238.95 tons per year. 40 CFR 60.14 defines "modification", as a physical or operational change to the existing facility which results in an increase in the actual emissions rate. Emission rate shall be expressed as kilogram per hour (kg/hr) of any pollutant, not potential, or limited emissions". Although the changes to the Deck Line are included in the sourcewide VOC limit of 249 tons per year, there is no guarantee that this line will not have any increase in emissions, not unless it is limited to zero emission. Therefore, 40 CFR Part 60, Subpart TT (NSPS - Standards of Performance for Metal Coil Surface Coating) will apply to the

proposed modification to the Deck Line. Operation conditions that referenced the NSPS applicability will not be deleted, in the final permit.

Comment 3: A typographical error has been made on paragraph (a) of the proposed Operation Condition B.9, the source should reference metal joists, trusses and decking fabrication used for the building construction industry.

Response 3: Proposed Operation Condition B.9 of the proposed permit, will be revised to state that the source deals with the fabrication of metal joists, trusses and decking fabrication used for the building construction industry.

Comment 4: The Deck Line is not subject to 40 CFR 60, Subpart TT as described above. Please delete proposed Operation Conditions D.1.2, D.1.3, and D.1.6.

Response 4: See response 2.

Upon further review, OAM has made the following changes (changes are bolded for emphasis).

Comment 1: 40 CFR Part 60.463 requires an initial compliance test as required in § 60.8(a), and each calendar month thereafter. This should be stated in Operation Condition D.1.3 of the draft permit. A written report of the result of the initial performance test shall be sent to the Office of Air Management (OAM).

Response 1a: Operation Condition D.1.3 originally proposed as follows:

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D.1.3 Testing Requirements [326 IAC 2-1-3] [40 CFR Part 460.466]

During the period between 60 and 180 days after achieving the maximum production rate, the Permittee shall determine the VOC content of the coatings as applied to the surface of the metal coil using Method 24 or other methods as approved by the Commissioner. This test shall be repeated every time there is a change in the coatings that are applied.

to as follows:

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D.1.3 Testing Requirements [326 IAC 2-1-3] [40 CFR Part **460.463** - 460.466]

**(a)** During the period between 60 and 180 days after achieving the maximum production rate, the Permittee shall **conduct an initial performance test** to determine the VOC content of the coatings as applied to the surface of the metal coil using Method 24 or other methods as approved by the Commissioner. **(b) This test shall be repeated each calendar month** and every time there is a change in the coatings that are applied, **whichever comes first.**

Response 1b: The initial performance test requirement will require an initial reporting, and each calendar month performance test will only require record keeping of test results. Therefore, the Operation Conditions D.1.7 and D.1.8 will be revised.

Operation Condition D. 1.7 originally proposed as follows:

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D.1.7 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC

emission limits established in Conditions D.1.1 and D.1.2.

- (1) The amount of VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each calendar day;
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each calendar day and month;
  - (6) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

To as follows:

#### D.1.7 Record Keeping Requirements

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- (a) To document compliance with Conditions D.1.1, D.1.2 and **D.1.3** the Permittee shall maintain records in accordance with (1) through (7) below. Records maintained for (1) through (7) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, D.1.2, and D.1.3.
  - (1) **The Permittee shall maintain records of the result of each performance test required in D.1.3(b).**
  - (2) The amount of VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (3) A log of the dates of use;
  - (4) The volume weighted VOC content of the coatings used for each calendar day and **month**;
  - (5) The cleanup solvent usage for each **day and** month;
  - (6) The total VOC usage for each calendar day and month;
  - (7) The weight of VOC emitted for each compliance period.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Operation Condition D.1.8 as originally proposed:

**D.1.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition C.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

To as follows:

**D.1.8 Reporting Requirements**

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- (a) A quarterly summary of the information to document compliance with Condition C.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
- (b) **A written report of the result of the initial performance test shall also be submitted to address listed in Section C- General Reporting Requirements.**