BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ORIGINAL

RETURN TO CLERK'S OFFICE

NACME Steel Processing, L.L.C.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 13-1 (Permit Appeal)
	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
Respondent.	)	

RECEIVED
CLERK'S OFFICE
AUG 0 1 2012
STATE OF ILLINOIS
Pollution Control Board

NOTICE OF FILING

To: Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the Petition for Hearing of **NACME Steel Processing, L.L.C.**, a copy of which is herewith served upon you.

Edward V. Walsh, III

August 1, 2012

Edward V. Walsh, III
Reed Smith, LLP
10 South Wacker
Suite 4000
Chicago, Illinois 60606
(312) 207-1000

CERTIFICATE OF SERVICE

I, the undersigned, certify that I have served the attached **PETITION FOR HEARING**, by U.S. Regular Mail, upon the following persons:

Pollution Control Board, Attn: Clerk
100 West Randolph Street
James R. Thompson Center, Suite 11-500
Chicago, Illinois 60601-3218

Division of Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

By: 

Edward V. Walsh, III

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

ORIGINAL

RETURN TO CLERK'S OFFICE

NACME Steel Processing, L.L.C.,	)	
	)	
Petitioner,	)	
	)	
v.	)	PCB 13-7 (Permit Appeal)
	)	
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY,	)	
	)	
	)	
Respondent.	)	

PETITION FOR HEARING

Petitioner NACME Steel Processing, L.L.C. ("NACME"), by its attorneys, Reed Smith, LLP., pursuant to Section 40.2 of the Illinois Environmental Protection Act (the "Act"), petitions the Board for review of the Illinois Environmental Protection Agency's (the "Agency") grant of a permit under Section 39.5 of the Act with contested conditions, and in support of its Petition states as follows:

1. Petitioner is the owner/operator of a steel pickling facility located at 429 West 127th Street, Chicago, Illinois (the "Facility"). In connection with Facility processes, NACME applies rust preventative oil to a certain percentage of steel coils pickled at its Facility prior to shipment to customers.

2. On or about October 2005 NACME applied to the Agency for a Federally Enforceable State Operating Permit ("FESOP") for its Facility.

3. On or about April 26, 2012 the Agency issued "an air emission source Construction Permit and preliminary draft Federally Enforceable State Operating Permit" containing various standard and some special conditions and requesting NACME's comments by May 17, 2012. (a copy of the draft FESOP is attached as Exhibit A)

4. Two special conditions were included in the FESOP based on the Agency's incorrect conclusion that NACME engaged in metal coil surface coating operations because it applies rust preventative oil to some steel coils pickled at its Facility prior to shipment to customers.

5. By letter dated May 15, 2012, by its consultant Mostardi Platt, NACME objected to these special conditions because, in fact, it does not engage in metal coil surface coating operations within the meaning of the regulatory standards cited by the Agency. NACME repeats and incorporates by reference the objections stated in its May 15, 2012 comment letter as if fully set forth herein. (NACME's May 15, 2012 letter is attached as Exhibit B)

6. The Agency responded to NACME's objections by letter dated May 23, 2012, and agreed to remove special permit condition 1a, under the National Emissions Standard for Hazardous Air Pollutants ("NESHAP") for Steel Pickling- HCL Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 subpart SSSS. (the Agency's May 23, 2012 letter is attached as Exhibit C)

7. However, the Agency refused to remove special condition 2a, imposed under the New Source Performance Standard set forth in 40 CFR 60 Subpart TT, entitled "Standards for Performance for Metal Coil Surface Coating". (hereafter, the "Metal Coating" standard)

8. By Mostardi Platt letter dated June 14, 2012, NACME provided additional comments specifically addressing the pre-requisite language contained in the Metal Coating standard that the Agency wholly ignored in applying the standard to NACME's Facility. NACME pointed out that its Facility does not engage in either prime coating or finish coating operations within the meaning of the Metal Coating standard and, as such, was not subject to the standard. NACME repeats and incorporates by reference the contents of its June 14, 2012

additional comment letter as if fully set forth herein. (the June 14, 2012 comment letter is attached hereto as Exhibit D)

9. In a response letter dated June 15, 2012 the Agency defended special condition 2a by citing an EPA Applicability Determination ("AD") dated September 19, 1998. (the Agency's June 15, 2012 letter including the AD is attached hereto as Exhibit E)

10. By Mostardi Platt letter dated June 26, 2012 (transmitted by e-mail dated June 27) NACME noted that the EPA AD was inapplicable to the Facility on its face. The EPA AD does not address at all the issue of what constitutes a coating operation within the meaning of the Metal Coating standard. Rather it focuses on an entirely unrelated issue, the failure of the facility under consideration there to appropriately measure VOC emissions under the performance test requirements contained in 40 CFR 60, Sec. 60.463(i)(B). NACME also set forth additional detailed arguments as to why the Agency's position was incorrect. NACME repeats and incorporates by reference the contents of its June 27, 2012 comment letter as if fully set forth herein. (NACME's June 26, 2012 comment letter is attached hereto as Exhibit F)

11. Notwithstanding NACME's objection, later that same day, and based solely on the AD and no other evidence or document, the Agency insisted in an e-mail that NACME's application of rust preventative oil to steel coils at its plant was a coating operation subject to the Metal Coating standard. (the Agency's June 27, 2012 e-mail is attached hereto as Exhibit G).

12. The Illinois Environmental Protection Act, 415 ILCS 5/40.2 states in relevant part: "If the Agency…grants with conditions a CAAPP permit….the applicant…may within 35 days after the final permit action, petition for a hearing before the Board to contest the decision of the Agency." The Agency stated in its correspondence of June 27, 2012 that its inclusion of special condition 2a under the Metal Coating standard, was final.

13. The Agency is wrong in its application of the Metal Coating standard to NACME's Facility because NACME does not engage in "coating operations" as that phrase is used in the Metal Coating standard.

14. The construction of administrative rules and regulations is governed by the same standard as construction of statutes. *Bridgestone/Firestone, Inc. v Doherty,* 711 N.E. 2d 799, 804 (1999). In cases involving the interpretation of a statute by an agency charged with administering it, the agency's interpretation is afforded considerable deference, but it is not binding on the court and will be rejected if erroneous. *Denton v Civil Service Comm'n,* 679 N.E.2d 1234, 1236 (1997). The cardinal rule of statutory construction is to ascertain and give effect to the intent of the legislature. *Solich v George & Anna Portes Cancer Prevention Center of Chicago, Inc,* 630 N.E. 2d 820, 822 (1994) The words of a statute are given their plain and commonly understood meanings. *Forest City Erectors v Industrial Comm'n,* 636 N.E. 2d 969, 972 (1994)

15. With these rules of construction in mind, the Metal Coating standard, 40 CFR 60.460(a) states in relevant part:

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

Further, pursuant to 40 CFR 60.461, the following specific definitions apply to such coating operations:

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

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

16. NACME applies neither a prime coat nor a finish coat to steel coils at its Facility, as required for application of the Metal Coating standard.

17. NACME's Facility contains neither a curing oven nor a quench station, as required for application of the Metal Coating standard.

18. NACME does not dry or cure either an initial or final coating on the surface of any metal coil, as required for application of the Metal Coating standard.

19. Further, the rust preventative oil applied by NACME remains on the pickled steel to prevent corrosion prior to use by NACME's customers and does not contain any solids whereas the VOM content limit used in the Metal Coating standard is expressed in units of pounds VOM per pound of *solids*. (40 CFR 60.461; emphasis supplied)

20. The Agency has wholly ignored the above pre-requisites for application of the Metal Coating standard and has instead sought to apply the standard as if these provisions did not exist.

21. The Agency's interpretation of the Metal Coating standard is, moreover, completely at odds with the interpretation given to the standard by a sister state agency, the Indiana Department of Environmental Management ("IDEM"). In at least three different permit decisions issued to steel processing facilities in Indiana, IDEM made the following findings.

- "This source [applying a rust preventative surface coating] is not subject to the requirements of the New Source Performance Standard...40 CFR 60.640, Subpart TT... which applies to prime coat, finish coat and prime and finish coat combined operations

because it is not a prime or finish coat operation. (See, *Exempt Construction and Operation Status approval, Kasle Metal Processing, January 2006, Technical Support Document, page 4 of 5;* attached hereto as Exhibit H)

- "The application of rust preventative oils to the steel coils is not subject to the New Source Performance Standard…(40 CFR Part 60, Subpart TT) because this rule only applies to coating operations which use a curing oven and quench station as part of the process" (See, *Part 70 Construction Permit, Ispat Inland, April 1999, Technical Support Document for New Construction and Operation, page 4 of 6;* attached hereto as Exhibit I)

- "The definition of a finish coat operation is the coating application station, curing oven and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping press line only involves coating the metal coil with a petroleum lubrication oil …there are no curing ovens or quench stations associated with this process. The metal stamping press line does not fall under the definition of a finish coat operation; therefore, the requirements of 40 CFR 60.640, Subpart TT do not apply. (See, *FESOP, Syndicate Sales 1997, Techical Support Document, page 5 of 12;* attached hereto as Exhibit J)

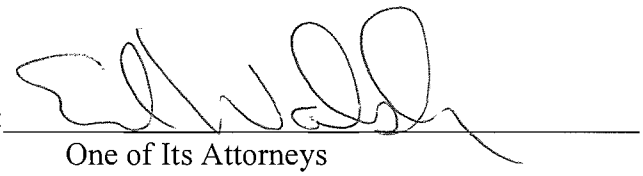
18. For all of the above reasons the Metal Coating standard does not apply to operations conducted at NACME's facility.

Accordingly, Petitioner requests a hearing venued in the City of Chicago concerning the contested special condition included in NACME's FESOP and for appropriate relief including, but not limited to, removal of the unsupported special condition 2a from NACME's FESOP permit.

Dated: August 1, 2012

Respectfully submitted,

NACME STEEL PROCESSING, L.L.C.,
Petitioner

By: 
One of Its Attorneys

Edward V. Walsh, III
ReedSmith, LLP
10 South Wacker Drive
Suite 4000
Chicago, Illinois 60606
(312) 207-1000

EXHIBIT A

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 785-1705

PAT QUINN, GOVERNOR JOHN KIM, INTERIM DIRECTOR

April 26, 2012

NACME Steel Processing, LLC
Attn: John DuBrock
429 W. 127th Street
Chicago, Illinois 60628

Re: Preliminary Draft Federally Enforceable State Operating Permit

I.D. Number: 031600FWL
Application Number: 05100052

Dear Mr. DuBrock:

Enclosed please find a preliminary draft Federally Enforceable State Operating Permit for NACME Steel Processing, LLC. Please review this draft permit, indicate any corrections that need to be made and provide your comments no later than May 17, 2012.

If you should have any questions regarding this permit, please contact Valeriy Brodsky at 217/785-1738.

Sincerely,

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Enclosure

cc: FOS, Region 1
Application File

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120
9511 W. Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 11-300, Chicago, IL 60601 (312)814-6026

DRAFT

217/785-1705

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- NSPS SOURCE

PERMITTEE

NACME Steel Processing, LLC
Attn: John DuBrock
429 West 127th Street
Chicago, Illinois 60628

Application No.: 05100052 I.D. No.: 031600FWL
Applicant's Designation: Date Received: October 25, 2005
Subject: Steel Pickling Line Modification
Date Issued: Expiration Date:
Location: 429 West 127th Street, Chicago, Cook County 60628

This Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of one (1) steel coil pickling line comprised of four (4) pickling tanks and coil washer exhausted to turbo-tunnel enclosure and three (3) 14,000 gallon hydrochloric acid storage tanks all controlled by a scrubber and one (1) steel coil oil coater pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This federally enforceable state operating permit is issued:

i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for any single Hazardous Air Pollutants (HAP), and 25 tons/year for any combination of such HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit are described in Attachment A.

ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart CCC and the NESHAP for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS.

b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.

c. This permit supersedes all operating permit(s) for this location.

fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

f. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 Ill. Adm. Code 212.321(c).

g. Pursuant to 35 Ill. Adm. Code 212.324(b), except as otherwise provided in 35 Ill. Adm. Code 212.324, no person shall cause or allow the emission into the atmosphere, of PM_{10}, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period.

4a. Pursuant to 35 Ill. Adm. Code 218.204(d), except as provided in 35 Ill. Adm. Code 218.205, 218.207, 218.208, 218.212, 218.215 and 218.216, no owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the following emission limitations for Coil Coating. Except as otherwise provided in 35 Ill. Adm. Code 218.204(a), (c), (g), (h), (j), (l), (n), (p), and (q), compliance with the emission limitations is required on and after March 15, 1996. The following emission limitations are expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator, except where noted. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition. Compliance with 35 Ill. Adm. Code 218 Subpart F must be demonstrated through the applicable coating analysis test methods and procedures specified in 35 Ill. Adm. Code 218.105(a) and the recordkeeping and reporting requirements specified in 35 Ill. Adm. Code 218.211(c) except where noted. The emission limitations are as follows:

Coil Coating	kg/l	lb/gal
	0.20	(1.7)

b. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G shall only apply to photochemically reactive material.

5a. This permit is issued based on the steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart

required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.

8. Pursuant to 40 CFR 60.11(d), at all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Illinois EPA or USEPA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

9a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.

b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.

c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:

i. The name and address of the source;

ii. The name and address of the owner or operator responsible for execution of the operating program;

iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;

iv. Location of unloading and transporting operations with pollution control equipment;

v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection

11a. This permit is issued based on negligible emissions of hydrogen chloride (HCl) from the steel coil pickling line and three hydrochloric acid storage tanks. For this purpose, HCl emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year. These limits are based on the maximum production rate, the most recent stack test data and the following operational limits:

i. Steel Coil Throughput: 120 tons/hr, 89,000 tons/mo, 1,050,000 tons/yr;

ii. Hydrochloric Acid Usage: 2,510 lbs/hr, 930 tons/mo, 11,000 tons/yr;

iii. Maximum HCl concentration in pickling tanks: 16%;

iv. Maximum pickling tanks temperature: 190°F;

v. Scrubber make-up water flow no less than 1.88 gal/min; and

vi. Pressure drop across the scrubber no more than 9.15" w.c.

b. The VOM usage and VOM emission from the oil coater shall not exceed the following limits:

VOM Usage		VOM Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
1.27	12.70	1.27	12.70

These limits are based on the maximum material usage, the maximum VOM and HAP content of the materials, and the maximum emissions determined by a material balance. The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum(V_i \times C_i)$$

Where:
E = VOM or HAP emissions (ton);

V_i = individual coating usage (ton); and

C_i = VOM or HAP content of the each individual coating (wt. fraction).

c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from the source shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.31 tons/month and 13.14 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements to obtain a CAAPP permit from the Illinois EPA, the NESHAP for for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart

d. Pursuant to 40 CFR 60.8(e), the owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

i. Sampling ports adequate for test methods applicable to such facility. This includes:

A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and

B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

ii. Safe sampling platform(s).

iii. Safe access to sampling platform(s).

iv. Utilities for sampling and testing equipment.

13a. Pursuant to 40 CFR 60.463(b), the owner or operator of an affected facility shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40 CFR 60.463.

b. Pursuant to 40 CFR 60.463(c)(1), the owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/ l of coating solids applied. An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under 40 CFR 60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Illinois EPA or USEPA may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Illinois EPA or USEPA.

i. Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided

to or less than 0.28 kg/ l, the affected facility is in compliance.

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

14a. Pursuant to 40 CFR 60.466(a)(1), the reference methods in appendix A to 40 CFR Part 60, except as provided under 40 CFR 60.8(b), shall be used to determine compliance with 40 CFR 60.462 as follows: Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

b. Pursuant to 40 CFR 60.466(b), for Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or

to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

21. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

22a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall maintain written records of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.

h. Pursuant to 35 Ill. Adm. Code 212.324(g)(3), a written record of the inventory of all spare parts not readily available from local suppliers shall be kept an updated.

i. Pursuant to 35 Ill. Adm. Code 212.324(g)(5), the records required under 35 Ill. Adm. Code 212.324 shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by Illinois EPA representatives during working hours.

23a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187 (a)(2):

i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;

ii. The VOM content of each cleaning solution as applied in each cleaning operation;

iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and

iv. The total monthly VOM emissions from cleaning operations at the source;

b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.

c. Pursuant to 35 Ill. Adm. Code 218.211(c)(2), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject coating line shall collect and record all of the following information each day, unless otherwise specified, for each coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each coating line;

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line.

26a. Pursuant to 35 Ill. Adm. Code 212.110(d), a person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent. Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

b. Pursuant to 35 Ill. Adm. Code 212.316(g)(1), the owner or operator of any fugitive particulate matter emission unit subject to 35 Ill. Adm. Code 212.316 shall submit to the Illinois EPA an annual report containing a summary of the application of control measures as may be needed for compliance with the opacity limitations of 35 Ill. Adm. Code. 212.316.

c. Pursuant to 35 Ill. Adm. Code 212.316(g)(5), a quarterly report shall be submitted to the Illinois EPA stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Illinois EPA 30 calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.

d. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.

27a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

b. Pursuant to 35 Ill. Adm. Code 218.211(c)(3), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:

i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Illinois EPA
Division of Air Pollution Control - Regional Office
9511 West Harrison
Des Plaines, Illinois 60016

If you have any questions on this permit, please contact Valeriy Brodsky at 217/785-1705.

Edwin C. Bakowski, P.E.
Manager, Permit Section
Division of Air Pollution Control

Date Signed: _____

ECB:VJB:

cc: Illinois EPA, FOS Region 1
Lotus Notes

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19506, SPRINGFIELD, ILLINOIS 62794-9506 - (217) 782-2113

PAT QUINN, GOVERNOR JOHN J. KIM, INTERIM DIRECTOR

217/785-1705

CONSTRUCTION PERMIT -- NSPS SOURCE

PERMITTEE

NACME Steel Processing, LLC
Attn: John DuBrock
429 West 127th Street
Chicago, Illinois 60628

Application No.: 12020035 I.D. No.: 031600FWL
Applicant's Designation: Date Received: February 23, 2012
Subject: Steel Pickling 1
Date Issued: April 26, 2012
Location: 429 West 127th Street, Chicago, Cook County 60628

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission unit(s) and/or air pollution control equipment consisting of modification of the existing steel coil pickling line comprised of four (4) pickling tanks and coil washer exhausted to turbo-tunnel enclosure and three (3) 14,000 gallon hydrochloric acid storage tanks all controlled by a scrubber and one (1) coil oil coater to allow increase of steel processing rate as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1a. This permit is issued based on the emission of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act from the above-listed equipment being less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result, this permit is issued based on the emissions of all HAPs from the above-listed equipment not triggering the requirements of Section 112(g) of the Clean Air Act.

b. This permit is issued based on the modification of existing steel coil pickling line not constituting a new major source or major modification pursuant to Title I of the Clean Air Act, specifically the 40 CFR 52.21 Prevention o Significant Deterioration of Air Quality. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit the emissions of Particulate Matter (PM) and Particulate Matter less than 10 microns (PM_{10}) from above-listed equipment below the levels that would trigger the applicability of these rules.

c. Operation of the equipment listed above is allowed under this construction permit until final action is taken on the Federally Enforceable State Operating Permit (FESOP) application for this source.

2a. The coil coater associated with the existing steel coil pickling line is subject to the New Source Performance Standards (NSPS) for Metal Coil Surface Coating, 40 CFR 60 Subparts A and TT. The Illinois EPA is administering the NSPS in Illinois on behalf of the United States EPA under a delegation agreement. Pursuant to 40 CFR 60.460(a) and (b), the provisions of 40 CFR 60 Subpart TT apply to the following affected facilities in a metal coil surface coating operation: each prime coat operation, each finish coat operation, and each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously that commences construction, modification, or reconstruction after January 5, 1981.

b. Pursuant to 40 CFR 60.462(a)(1), on and after the date on which 40 CFR 60.8 requires a performance test to be completed, each owner or operator subject to 40 CFR 60 Subpart TT shall not cause to be discharged into the atmosphere more than 0.28 kilogram VOC per liter (kg VOC/ l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s).

3a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.

b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.

c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

d. Pursuant to 35 Ill. Adm. Code 212.316(f), unless an emission unit has been assigned a particulate matter, PM_{10}, or fugitive particulate matter emissions limitation elsewhere in this 35 Ill. Adm. Code 212.316 or in 35 Ill. Adm. Code 212 Subparts R or S, no person shall cause or allow fugitive particulate matter emissions from any emission unit to exceed an opacity of 20 percent.

e. Pursuant to 35 Ill. Adm. Code 212.321(a), except as further provided in 35 Ill. Adm. Code Part 212, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from

b. This permit is issued based on coil coater associated with the existing steel coil pickling line at this source not being subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS. This is a result of the federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.

6a. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.

b. Pursuant to 35 Ill. Adm. Code 212.324(d), the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, 35 Ill. Adm. Code 212.324(d) is not a defense finding of a violation of the mass emission limits contained in 35 Ill. Adm. Code 212.324(b) and (c).

7a. This permit is issued based on the solvent cleaning operations at this source not being subject to the requirements of 35 Ill. Adm. Code 218.187(b). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012: Except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall apply to all cleaning operations that use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units;

b. Pursuant to 35 Ill. Adm. Code 218.209, no owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 is required to meet the limitations of 35 Ill. Adm. Code 218 Subpart G (35 Ill. Adm. Code 218.301 or 218.302), after the date by which the coating line is required to meet 35 Ill. Adm. Code 218.204.

are based on the maximum production rate, the most recent stack test data and the following operational limits:

i. Steel Coil Throughput: 120 tons/hr, 89,000 tons/mo, 1,050,000 tons/yr;

ii. Hydrochloric Acid Usage: 2,510 lbs/hr, 930 tons/mo, 11,000 tons/yr;

iii. Maximum HCl concentration in pickling tanks: 16%;

iv. Maximum pickling tanks temperature: 190°F;

v. Scrubber make-up water flow no less than 1.88 gal/min; and

vi. Pressure drop across the scrubber no more than 9.15" w.c.

b. The VOM usage and VOM emission from the oil coater shall not exceed the following limits:

VOM Usage		VOM Emissions	
Tons/Month	Tons/Year	Tons/Month	Tons/Year
1.27	12.70	1.27	12.70

These limits are based on the maximum material usage, the maximum VOM and HAP content of the materials, and the maximum emissions determined by a material balance. The VOM and HAP emissions shall be determined from the following equation:

$$E = \sum(V_i \times C_i)$$

Where:
E = VOM or HAP emissions (ton);

V_i = individual coating usage (ton); and

C_i = VOM or HAP content of the each individual coating (wt. fraction).

c. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act from pickling line shall not exceed 0.79 tons/month and 7.9 tons/year of any single HAP and 1.31 tons/month and 13.14 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirements of Section 112(g) of the Clean Air Act, the NESHAP for Steel Pickling – HCl Process Facilities and Hydrochloric Acid Regeneration Plants, 40 CFR 63 Subpart CCC, and the NESHAP for Surface Coating of Metal Coil, 40 CFR Part 63, Subpart SSSS.

d. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

A. Constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test 1 methods and procedures; and

B. Providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

ii. Safe sampling platform(s).

iii. Safe access to sampling platform(s).

iv. Utilities for sampling and testing equipment.

13a. Pursuant to 40 CFR 60.463(b), the owner or operator of an affected facility shall conduct an initial performance test as required under 40 CFR 60.8(a) and thereafter a performance test for each calendar month for each affected facility according to the procedures in 40 CFR 60.463.

b. Pursuant to 40 CFR 60.463(c)(1), the owner or operator shall use the following procedures for determining monthly volume-weighted average emissions of VOC's in kg/l of coating solids applied. An owner or operator shall use the following procedures for each affected facility that does not use a capture system and control device to comply with the emission limit specified under 40 CFR 60.462(a)(1). The owner or operator shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Illinois EPA or USEPA may require the owner or operator who uses formulation data supplied by the manufacturer of the coatings to determine the VOC content of coatings using Method 24 or an equivalent or alternative method. The owner or operator shall determine the volume of coating and the mass of VOC-solvent added to coatings from company records on a monthly basis. If a common coating distribution system serves more than one affected facility or serves both affected and existing facilities, the owner or operator shall estimate the volume of coating used at each affected facility by using the average dry weight of coating and the surface area coated by each affected and existing facility or by other procedures acceptable to the Illinois EPA or USEPA.

i. Calculate the volume-weighted average of the total mass of VOC's consumed per unit volume of coating solids applied during each calendar month for each affected facility, except as provided under 40 CFR 60.463(c)(1)(iv). The weighted average of the total mass of VOC's used per unit volume of coating solids applied each calendar month is determined by the following procedures.

no VOC's are added to the coatings during distribution or application.

14a. Pursuant to 40 CFR 60.466(a)(1), the reference methods in appendix A to 40 CFR Part 60, except as provided under 40 CFR 60.8(b), shall be used to determine compliance with 40 CFR 60.462 as follows: Method 24, or data provided by the formulator of the coating, shall be used for determining the VOC content of each coating as applied to the surface of the metal coil. In the event of a dispute, Method 24 shall be the reference method. When VOC content of waterborne coatings, determined by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24;

b. Pursuant to 40 CFR 60.466(b), for Method 24, the coating sample must be at least a 1-liter sample taken at a point where the sample will be representative of the coating as applied to the surface of the metal coil.

15a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

incinerator combustion temperature. If catalytic incineration is used, the owner or operator shall maintain at the source daily records of the gas temperature, both upstream and downstream of the incinerator catalyst bed.

21. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to Section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

22a. Pursuant to 35 Ill. Adm. Code 212.110(e), the owner or operator of an emission unit subject to 35 Ill. Adm. Code Part 212 shall retain records of all tests which are performed. These records shall be retained for at least three (3) years after the date a test is performed.

b. Pursuant to 35 Ill. Adm. Code 212.324(g)(1), written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with 35 Ill. Adm. Code 212.324(f).

c. Pursuant to 35 Ill. Adm. Code 212.324(g)(2), the owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

24a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:

i. Records addressing use of good operating practices for the scrubber and turbo-tunnel enclosure:

A. Records for periodic inspection of the scrubber and turbo-tunnel enclosure with date, individual performing the inspection, and nature of inspection; and

B. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

ii. Daily HCl concentration in pickling tanks (wt.%);

ii. Daily pickling tank temperature (°F);

iii. Daily scrubber make-up water flow (gal/min);

iv. Daily pressure drop across the scrubber (in of w.c.);

v. Steel process rate (tons/mo, tons/yr);

vi. Hydrochloric acid usage (gal/mo, gal/yr);

vii. Coating and cleanup solvent usage (tons/month and tons/year);

viii. The VOM and HAP content of each coating and cleanup solvent (% by weight);

ix. Monthly and annual emissions of PM, VOM and HAP from the steel coil pickling line with supporting calculations (tons/month, tons/year).

b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA or USEPA request for records during the course of a source inspection.

25a. Pursuant to 40 CFR 60.7(a), any owner or operator subject to the provisions of 40 CFR Part 60 shall furnish the Illinois EPA or USEPA written notification or, if acceptable to both the Illinois EPA and

Illinois EPA. Such notification shall state the specific test methods from 35 Ill. Adm. Code 212.110 that will be used.

b. Pursuant to 35 Ill. Adm. Code 212.324(g)(4), copies of all records required by 35 Ill. Adm. Code 212.324 shall be submitted to the Illinois EPA within ten (10) working days after a written request by the Illinois EPA.

27a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.

b. Pursuant to 35 Ill. Adm. Code 218.211(c), any owner or operator of a coating line subject to the limitations of 35 Ill. Adm. Code 218.204 other than 35 Ill. Adm. Code 218.204(a)(1)(B), (a)(1)(C), (a)(2)(B), (a)(2)(C), or (a)(2)(D) and complying by means of 35 Ill. Adm. Code 218.204 shall comply with the following:

i. By a date consistent with 35 Ill. Adm. Code 218.106, or upon initial start-up of a new coating line, or upon changing the method of compliance from an existing subject coating line from 35 Ill. Adm. Code 218.205, 35 Ill. Adm. Code 218.207, 35 Ill. Adm. Code 218.215, or 35 Ill. Adm. Code 218.216 to 35 Ill. Adm. Code 218.204; the owner or operator of a subject coating line shall certify to the Illinois EPA that the coating line will be in compliance with 35 Ill. Adm. Code 218.204 on and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date. The certification shall include:

A. The name and identification number of each coating as applied on each coating line;

B. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating line;

ii. On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject coating line shall notify the Illinois EPA in the following instances:

A. Any record showing violation of 35 Ill. Adm. Code 218.204 shall be reported by sending a copy of such record to the Illinois EPA within 30 days following the occurance of the violation.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
P. O. BOX 19506
SPRINGFIELD, ILLINOIS 62794-9506

STANDARD CONDITIONS FOR CONSTRUCTION/DEVELOPMENT PERMITS ISSUED BY THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

July 1, 1985

The Illinois Environmental Protection Act (Illinois Revised Statutes, Chapter 111-1/2, Section 1039) authorizes the Environmental Protection Agency to impose conditions on permits which it issues.

The following conditions are applicable unless susperseded by special condition(s).

1. Unless this permit has been extended or it has been voided by a newly issued permit, this permit will expire one year from the date of issuance, unless a continuous program of construction or development on this project has started by such time.

2. The construction or development covered by this permit shall be done in compliance with applicable provisions of the Illinois Environmental Protection Act and Regulations adopted by the Illinois Pollution Control Board.

3. There shall be no deviations from the approved plans and specifications unless a written request for modification, along with plans and specifications as required, shall have been submitted to the Agency and a supplemental written permit issued.

4. The permittee shall allow any duly authorized agent of the Agency upon the presentation of credentials, at reasonable times:

   a. to enter the permittee's property where actual or potential effluent, emission or noise sources are located or where any activity is to be conducted pursuant to this permit,

   b. to have access to and to copy any records required to be kept under the terms and conditions of this permit,

   c. to inspect, including during any hours of operation of equipment constructed or operated under this permit, such equipment and any equipment required to be kept, used, operated, calibrated and maintained under this permit,

   d. to obtain and remove samples of any discharge or emissions of pollutants, and

   e. to enter and utilize any photographic, recording, testing, monitoring or other equipment for the purpose of preserving, testing, monitoring, or recording any activity, discharge, or emission authorized by this permit.

5. The issuance of this permit:

   a. shall not be considered as in any manner affecting the title of the premises upon which the permitted facilities are to be located,

   b. does not release the permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the proposed facilities,

   c. does not release the permittee from compliance with other applicable statutes and regulations of the United States, of the State of Illinois, or with applicable local laws, ordinances and regulations,

   d. does not take into consideration or attest to the structural stability of any units or parts of the project, and

DIRECTORY
ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR

For assistance in preparing a permit application contact the Permit Section.

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section
1021 N. Grand Ave E.
P.O.Box 19506
Springfield, Illinois 62794-9506

or a regional office of the Field Operations Section. The regional offices and their areas of responsibility are shown on the map. The addresses and telephone numbers of the regional offices are as follows:

Illinois EPA
Region 1
Bureau of air, FOS
9511 West Harrison
Des Plaines, Illinois 60016
847/294-4000

Illinois EPA
Region 2
5415 North University
Peoria, Illinois 61614
309/693-5463

Illinois EPA
Region 3
2009 Mall Street
Collinsville, Illinois 62234
618/346-5120

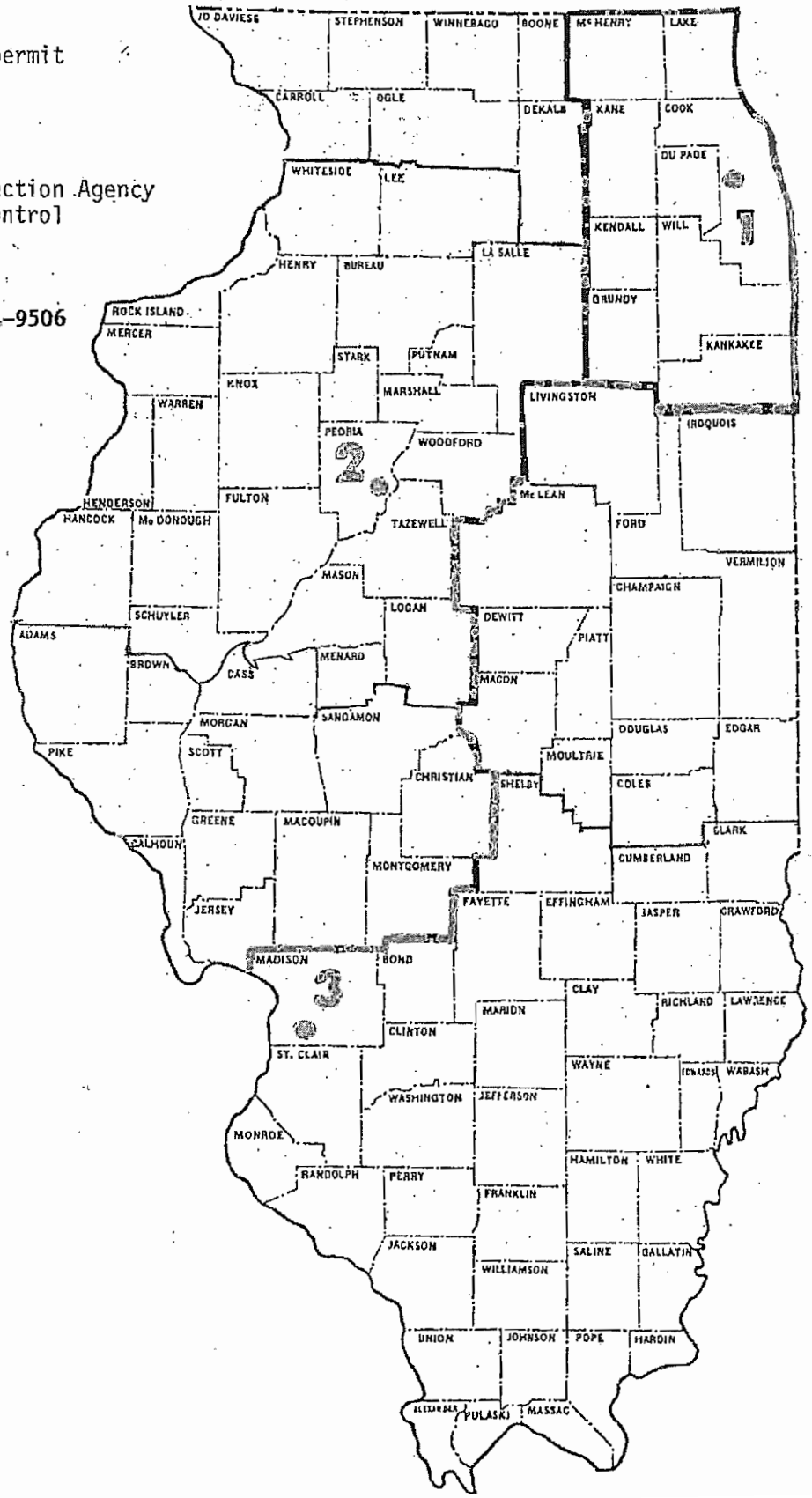


EXHIBIT B

mostardi platt

May 15, 2012

Mr. Edwin Bakowski
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62702

Via E-Mail and Regular Mail

RE: April 2012 Draft FESOP Comments
NACME Steel Processing, LLC
I.D. No. 031600FWL
Application No.05100052

Mr. Bakowski:

The following comments are being provided regarding the preliminary Draft Federally Enforceable State Operating Permit (FESOP) issued to the NACME Steel Processing, LLC (NACME) facility located at 429 West 127th Street in Chicago, Illinois (the facility) by IEPA letter dated April 26, 2012.

NACME has been waiting nearly 4 years for IEPA to process its FESOP application. We have corresponded about this numerous times and do not here set forth the entire history of our efforts. A summary of events can be found in NACME's response letter to Violation Notice A-2010-00151, dated April 14, 2011. Following that letter NACME met with Illinois assistant attorney general Nancy Tikalsky at her office. The IEPA Permit Engineer processing the FESOP application and other IEPA staff attended the meeting by telephone. At the meeting IEPA promised to process a resubmittal of NACME's FESOP application in the normal course. NACME agreed subject to a complete reservation of its legal rights with respect to the violation notice and its underlying assertions.

The imposition of National Emission Standards for Hazardous Air Pollutants (NESHAP) and New Source Performance Standards (NSPS) ("the Standards") for Metal Coil Surface Coating Operations to NACME's current operations, as proposed in the draft permit, is not only incorrect, but given the lengthy history of this application is surprising. The Standards were never mentioned in numerous prior communications including when IEPA issued operating permits to NACME, in permit renewal correspondence, or in responses to NACME's earlier FESOP application. IEPA never alluded to the Standards during NACME's hydrochloric acid (HCl) emission compliance testing done at IEPA's request.

Moreover, the protective oil application process used at NACME's facility does not fall within the definition of coating operations as used in the Standards. NACME is, thus, not subject to the Standards.

888 Industrial Drive
Elmhurst, Illinois 60126
630-993-2100

Specifically, we offer the following comments:

Permit Condition No. 1a.ii

Condition 1a.ii discusses the NESHAP for Surface Coating of Metal Coils, 40 CFR 63, Subpart SSSS. This condition indicates that the facility has established federally enforceable production and operating limitations, which restrict potential to emit to less than 10 tons per year for any individual Hazardous Air Pollutant (HAP), and 25 tons per year for any combination of such HAPs so that the source is not subject to the requirements of 40 CFR 63, Subpart SSSS.

NACME Comment: NACME requests that the reference to the NESHAP requirements of 40 CFR 63, Subpart SSSS be removed from Condition 1a.ii because it does not apply to operations at the facility. NACME also requests that a Condition No. 1a.iii be added to the FESOP stating the NESHAP outlined in 40 CFR 63, Subpart SSSS does not apply to operations at the facility because the metal coil oil application operation does not meet the definition of a Coating Line nor does the protective oil meet the definition of a coating.
Pursuant to 40 CFR 63.5090, the provisions of this subpart apply to each facility that is a major source of HAP at which a coil coating line is operated. Additionally, 40 CFR 63.5110 specifically states:

- *Coating* means material applied onto or impregnated into a substrate for decorative, protective, or functional purposes. Such materials include, but are not limited to, paints, varnishes, sealants, inks, adhesives, maskants, and temporary coatings. *Decorative, protective, or functional materials that consist only of solvents, protective oils, acids, bases, or any combination of these substances are not considered coatings for the purposes of this subpart.*

Furthermore, as also stated in 40 CFR 63.5110:

- *Coil coating line* means a process and the collection of equipment used to apply an organic coating to the surface of metal coil. A coil coating line includes a web unwind or feed section, a series of one or more work stations, any associated curing oven, wet section, and quench station. A coil coating line does not include ancillary operations such as mixing/thinning, cleaning, wastewater treatment, and storage of coating material.

Accordingly, application of a protective oil to the coils is not subject to 40 CFR 63, Subpart SSSS as shown by reference to the coating and coating line definitions listed in 40 CFR 63.5110. NACME applies a protective rust preventative oil to metal coils at an application station at the end of the steel pickling line. The protective oil remains on the coil after it is applied. There is no curing oven or quench station on this process line. Therefore, the Metal Coil Surface

Coating NSPS should not apply to operations at the NACME facility. Additionally, the protective oil application process does not fall under any other NSPS.

Permit Condition No. 2a

Condition 2a currently states that the Coil Coater at the facility is subject to NSPS for Metal Coil Surface Coating, 40 CFR 60, Subpart TT.

NACME Comment: The Metal Coil Surface Coating NSPS does not apply to operations at the NACME facility because the oil application process does not meet the definition of prime or finish coat operations. Additionally, this protective rust preventative oil application process does not fall under any other NSPS.

As stated in 40 CFR 60.460(a), the Metal Coil Surface Coating NSPS applies only to the following coating operations:

- Each prime coat operation,
- Each finish coat operation, and
- Each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

Pursuant to 40 CFR 60.461, the following specific definitions apply to such coil coating operations:

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

As indicated, NACME coats metal coils with a protective rust preventative oil which involves the use of an oil application station at the end of the steel pickling line. The protective oil does not contain any solids and is not subject to the VOM content limits for this Subpart. The protective oil remains on the coil after application. There is no drying or curing of the protective oil and no curing oven or quench station is located on this process line.

Permit Condition No. 2b

Condition 2b states that, pursuant to 40 CFR 60.462(a)(1), each owner or operator subject to 40 CFR 60, Subpart TT shall not cause to be discharged into the atmosphere, more than 0.28 kilograms per liter of coating solids applied for each calendar month.

NACME Comment: NACME requests revision of Condition 2a to state that the NSPS of 40 CFR 60, Subpart A and TT does not apply to metal coil protective oil application operations at the facility since the protective rust preventative oil application operation does not meet the definition of prime coat or finish coat operations as outlined in 40 CFR 60.461. As indicated above, 40 CFR 60, Subpart TT does not apply since the protective rust preventative oil operations do not meet the definition of either the prime coat or finish coating operations listed in 40 CFR 60.461 and the protective oil coating is to remain on the metal coils after application (e.g., is not cured or dried) and does not contain any solids.

Permit Condition No. 4b

Condition No. 4b indicates that no more than 8 pounds VOM per hour of organic material shall be discharged into the atmosphere from any emission unit.

NACME Comment: NACME requests that additional language be inserted into Permit Condition 4b that states the coil oil application operation is not subject to the limitations of 35 IAC 218.301 pursuant to 35 IAC 218.209 which states:

- No owner or operator of a coating line subject to the limitations of Section 218.204 of this Part is required to meet the limitations of Subpart G (Section 218.301 or 218.302) of this Part, after the date by which the coating line is required to meet Section 218.204 of this Part

Permit Condition No. 5b

Condition 5b states the coil coater associated with the existing steel coil pickling line at this source is not subject to the NESHAP for Surface Coating of Metal Coil, 40 CFR 63, Subpart SSSS as a result of federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons per year individual HAP and 25 tons per year of any combination of HAPs.

NACME Comment: NACME requests that Condition No. 5b be revised to state that the NESHAP outlined in 40 CFR 63, Subpart SSSS does not apply to operations at the facility because the metal coil protective oil application operation does not meet the definition of a coating line; NACME applies a protective oil to the coils that is not subject to 40 CFR 63, Subpart SSSS pursuant to the coating and coating line definitions listed in 40 CFR 63.5110.

See Comment to Permit Condition 1a.ii above which provides information demonstrating the non-applicability of the cited NESHAP regulation.

Permit Condition No. 11c

Condition 11c references monthly and annual limits on HAP emissions for both individual and combined HAP emissions. Additionally, this Condition also references the NESHAP for Surface Coating of Metal Coil (40 CFR 63, Subpart SSSS).

NACME Comment: As previously discussed above regarding Conditions 1a.ii and 5b, the Surface Coating of Metal Coils NESHAP does not apply to protective oil application operations. Additionally, while the language in the Condition referencing the non-applicability of the NESHAP for Steel Pickling Operations in 40 CFR 63, CCC is accurate there is no regulation that limits monthly or annual individual or combined HAP emissions other than maintaining these HAP emission levels below the major source levels of 10 tons per year of individual HAPs and 25 tons per year combined HAPs.

Therefore, with regards to the reference to the Surface Coating of Metal Coils, NACME requests that this reference be removed because the cited NESHAP does not apply to operations at the facility.

In addition, while there is no monthly or annual limit on HAP emissions other than those discussed above, NACME requests that the monthly and annual emission limitations outlined in the current draft FESOP be removed. However, NACME understands the importance of minimizing the emissions of HAPs and would accept to have this Condition revised to limit individual HAP emissions to 9.0 tons per year and combined HAP emissions to 22.5 tons per year with no monthly limitations.

Permit Condition No. 13a and b/Permit Condition No. 14a and b

NACME Comment: As indicated in the comments regarding Permit Condition Nos. 2a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME requests that Permit Condition Nos. 13a and b and 14a and b be removed from the FESOP.

Permit Condition No. 18/Permit Condition No. 19a and b/Permit Condition No. 20/Permit Condition No 25

NACME Comment: As indicated in the comments regarding Permit Condition Nos. 2a and b, 13a and b, and 14a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME requests that Permit Condition Nos. 18, 19a and b, 20 and 25 be removed from the FESOP.

If you have any questions or require further information, please contact our consultant, Britt Wenzel of Mostardi Platt at 630-993-2123.

Respectfully Submitted,

Britt E. Wenzel

Britt Wenzel
Manager, Environmental, Health & Safety Compliance Services

cc: J. DuBrock, National Processing Company
David Susler, National Materials, L.P.
Ms. Nancy Tikalsky, IAG

Walsh III, Edward V.

From: BWenzel@mp-mail.com
Sent: Wednesday, May 16, 2012 3:59 PM
To: Valeriy.Brodsky@Illinois.gov
Cc: Walsh III, Edward V.; dsusler@nmlp.com
Subject: NACME (I.D. No. 031600FWL) Comments to Draft FESOP
Attachments: NACME Draft FESOP Comment Letter_0516.pdf

Valeriy:

Per our discussion, attached please find an electronic copy of the correspondence issued to the Illinois EPA regarding comments to the Draft Federally Enforceable State Operating Permit (FESOP) issued for the NACME Steel Processing facility located at 429 West 127th Street in Chicago, Illinois. The original of this letter has been sent for delivery to the Illinois EPA tomorrow.

(See attached file: NACME Draft FESOP Comment Letter_0516.pdf)

Please contact me with any questions.

Regards,

mostardi platt
Britt E. Wenzel
bwenzel@mp-mail.com
t: 630-993-2123 *m*: 630-688-1799 *f*: 630-993-9017
888 Industrial Drive Elmhurst IL 60126
www.mostardi-platt.com

EXHIBIT C

Walsh III, Edward V.

From: Brodsky, Valeriy [Valeriy.Brodsky@Illinois.gov]
Sent: Wednesday, May 23, 2012 3:56 PM
To: BWenzel@mp-mail.com
Cc: Walsh III, Edward V.; dsusler@nmlp.com; Bernoteit, Bob
Subject: RE: NACME (I.D. No. 031600FWL) Comments to Draft FESOP

Mr. Wenzel,

We have no problems with deleting conditions related to NESHAP Subpart SSSS applicability. However, we consider rust preventive oil application as being subject to NSPS Subpart TT. Per definitions in 60.461: *Coating* means any organic material that is applied to the surface of metal coil; and *Metal coil surface coating operation* means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil. NACME operations fit perfectly well in these definitions. Please let us know if you and the company agree with us and we can proceed with public notice. Thank you.

Valeriy Brodsky
Environmental Protection Engineer
Illinois EPA, Bureau of Air

Telephone: 217/785-1738
Fax: 217/524-5023
e-mail: Valeriy.Brodsky@illinois.gov

From: BWenzel@mp-mail.com [mailto:BWenzel@mp-mail.com]
Sent: Wednesday, May 16, 2012 3:59 PM
To: Brodsky, Valeriy
Cc: EWalsh@ReedSmith.com; dsusler@nmlp.com
Subject: NACME (I.D. No. 031600FWL) Comments to Draft FESOP

Valeriy:

Per our discussion, attached please find an electronic copy of the correspondence issued to the Illinois EPA regarding comments to the Draft Federally Enforceable State Operating Permit (FESOP) issued for the NACME Steel Processing facility located at 429 West 127th Street in Chicago, Illinois. The original of this letter has been sent for delivery to the Illinois EPA tomorrow.

(See attached file: NACME Draft FESOP Comment Letter_0516.pdf)

Please contact me with any questions.

Regards,

mostardi platt
Britt E. Wenzel
bwenzel@mp-mail.com
t: 630-993-2123 *m:* 630-688-1799 *f:* 630-993-9017

888 Industrial Drive Elmhurst IL 60126
www.mostardi-platt.com

EXHIBIT D

mostardi platt

June 14, 2012

Mr. Edwin Bakowski
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62702

Via E-Mail and Regular Mail

RE: April 2012 Draft FESOP Comments
NACME Steel Processing, LLC
I.D. No. 031600FWL
Application No.05100052

Mr. Bakowski:

The following additional comments are being provided regarding the preliminary Draft Federally Enforceable State Operating Permit (FESOP) issued to the NACME Steel Processing, LLC (NACME) facility located at 429 West 127th Street in Chicago, Illinois (the facility) by IEPA letter dated April 26, 2012.

On May 23, 2012, I received email correspondence from Valeriy Brodsky, Permit Engineer for the Illinois Environmental Protection Agency (IEPA) responding to my May 15, 2012 draft FESOP comments letter. In the May 23, 2012 correspondence, Mr. Brodsky indicated that the IEPA has no issue with our request to delete conditions related to NESHAP Subpart SSSS applicability in the draft FESOP. Mr. Brodsky further indicated that the IEPA considers rust preventive oil application as being subject to NSPS Subpart TT and NACME operations fit within this definition. Additionally, no response was provided concerning our comments for draft FESOP Condition Nos. 4b and 11c.

While we agree with Mr. Brodsky regarding the non-applicability of the 40 CFR 63, Subpart SSSS, we would like to further respond to Mr. Brodsky's assertion that the application of the rust preventative oil at the facility is subject to the 40 CFR 60, Subpart TT and re-iterate our comments regarding the draft FESOP Conditions Nos. 4b and 11c.

888 Industrial Drive
Elmhurst, Illinois 60126
630-993-2100

Concerning our initial response regarding the applicability of the NSPS outlined in 40 CFR 60, Subpart TT, we continue to assert that the protective oil application process used at NACME's facility does not fall within the definition of coating operations as used in the Standards. NACME is, thus, not subject to the Standards.

Permit Condition No. 2a

Condition 2a currently states that the Coil Coater at the facility is subject to NSPS for Metal Coil Surface Coating, 40 CFR 60, Subpart TT.

NACME Comment: As previously stated, the Metal Coil Surface Coating NSPS does not apply to operations at the NACME facility because the oil application process does not meet the specific definition of prime or finish coat operations in the Standard.

As stated in 40 CFR 60.460(a), the Metal Coil Surface Coating NSPS applies only to the following coating operations:

- Each prime coat operation,
- Each finish coat operation, and
- Each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

As listed in 40 CFR 60.461, the following specific definitions apply to coil coating operations subject to the NSPS

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

As indicated, NACME applies a protective rust preventative oil to metal coils which involves the use of an oil application station at the end of the steel pickling line. The protective oil is not dried or cured and does not contain any solids. Therefore, the protective oil is not subject to the VOM content limits for this Subpart. The protective oil remains on the coil after application and no quenching of the oiled metal coils is required (e.g., there is no quench station on this process line).

Furthermore, review of other current permits issued by the Indiana Department of Environmental Management (IDEM) for other protective or lubricating oil application processes and guidance documents issued to states from the United States Environmental Protection Agency (USEPA) regarding what constitutes a metal coil coating operations provide further evidence that the application of a rust preventative oil is not subject to this NSPS.

Attachment A contains the following Technical Support Documents (TDSs) for air emission source permits issued by IDEM to facilities, which are available at the USEPA's Region 5 Division of Air and Radiation Indiana Permit Database, that perform rust preventative protective oil application processes onto metal coils:

- Ispat Inland, Inc. East Chicago, Indiana (Ispat) TSD for a Part 70 Source Construction Permit (Permit No. CP-089-10472-00316) – Ispat applies rust preventative oil to metal coils. The Federal Rule Applicability Section of the TSD (page 4 of 6) states that "*the application of rust preventative oils to the steel coils is not subject to the New Source Performance Standard 326 IAC 12 (40 CFR 60, Subpart TT) because this rule only applies to coating operations which use a curing oven and quench station as part of the process*".

- Syndicate Sales, Inc., Kokomo, Indiana (Syndicate) TSD for a FESOP Source (Permit No. F067-7699-00026) – Syndicate applies a petroleum lubricant to metal coils. The Federal Rule Applicability Section of the TSD (page 5 of 12) states that *"where only a single coating is applied to the metal coil, that coating is considered a finish coat. The definition of Finish Coat Operation is the coating application station, curing oven, and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping process only involves coating metal coil with petroleum*

lubricating oil to facilitate the shaping and cutting of the coil into metal stems in the stamping process. There are no curing ovens associated with the process. The metal stamping line does not fall under the definition of a finish coating operation, therefore, the requirements of 40 CFT 60.460, Subpart TT do not apply."

- Kasle Metal Processing, Jeffersonville, Indiana (Kasle) TSD for a Construction Permit (Permit No. 019-22372-00119) – Kasle applies a rust preventative surface coating to steel blanks. The Federal Rule Applicability Section of the TSD (page 4 of 5) states that *"this source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.460, Subpart TT – Standards and Performance for Metal Coil Surface Coating Operations, which applies to prime coat, finish coat, and prime and finish coat combined operations because it is not a prime or finish coat operation".*

- The USEPA Guidance Document (Document No. EPA-453/P-00-001) *National Emissions Standards for Hazard Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards*, while it does not specifically address the NSPS requirements, outlines the "Metal Coil Coating Industry Profile and Process Description" (Section 3). Within this section of the USEPA Guidance Document, the USEPA describes the metal coil coating process as one that includes *"a wet station and one or more coating operations consisting of* ***a coating application station, a curing oven, and a quench area"***.

Copies of the IDEM TSDs and the Section 3.0 of the USEPA *National Emissions Standards for Hazard Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards* are included in Attachment A.

The Ispat TSD clearly states that the application of a rust preventative oil to a steel coil is not subject to the NSPS because the rule only applies to coating operations which use a curing oven and quench station as part of the process.

As indicated in Mr. Brodsky's response, he indicated the roll oil falls under the definition of coating. As stated in the Syndicate TSD, an oil can be considered a coating and not be subject to the NSPS outlined in 40 CFR 60, Subpart TT.

The Kasle TDS specifically states that the application of a rust preventative coating is not a prime or finish coat operation.

The USEPA's own *National Emissions Standards for Hazard Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards* supports NACME's position as it clearly states that a metal coil surface coating operation consists of a wet station and one or more coating operations consisting of a coating application station, a curing oven, and a quench area. If USEPA believed that a rust preventative surface coating without a curing oven or a quench station – such as NACME's here – fell within the definition of a metal surface coating operation and Subpart TT, then it would not have limited its guidance (or its definitions) to only those operations that include curing ovens and quenching stations. By doing so, the USEPA has clearly expressed its intention that Subpart TT ***not*** apply to a metal coating operation ***unless*** there is a curing oven or quench station involved. This conclusion is consistent not only with the definitions promulgated by USEPA itself in 40 CFR. 60.461, but also with the application of those definitions by IDEM to coating lines similar to NACME's here as detailed above.

Taken together, the TSDs, the USEPA guidance document, and the definitions in Subpart TT provide convincing evidence that the application of a rust preventative oil onto the metal coils does not meet the definition of finish or prime coat operations and, as a result, are not subject to the NSPS requirements of 40 CFR 60, Subpart TT.

Permit Condition No. 2b

Condition 2b states that, pursuant to 40 CFR 60.462(a)(1), each owner or operator subject to 40 CFR 60, Subpart TT shall not cause to be discharged into the atmosphere, more than 0.28 kilograms per liter of coating solids applied for each calendar month.

NACME Comment: Based upon the information provided in the initial May 2012 draft FESOP response and the additional information provided in this correspondence, NACME requests revision of Condition 2a to state that the NSPS of 40 CFR 60, Subpart A and TT does not apply to metal coil protective oil application operations at the facility since the protective rust preventative oil application operation does not meet the definition of prime coat or finish coat

operations as outlined in 40 CFR 60.461. As indicated above, 40 CFR 60, Subpart TT does not apply since the protective rust preventative oil application process do not meet the definition of either the prime coat or finish coating operations listed in 40 CFR 60.461 and the protective oil coating remains on the metal coils after application (e.g., is not cured or dried) and does not contain any solids.

Permit Condition No. 4b

Condition No. 4b indicates that no more than 8 pounds VOM per hour of organic material shall be discharged into the atmosphere from any emission unit.

NACME Comment: Per our previous comment regarding this permit condition, NACME requests that additional language be inserted into Permit Condition 4b that states the coil oil application operation is not subject to the limitations of 35 IAC 218.301 pursuant to 35 IAC 218.209 which states:

- No owner or operator of a coating line subject to the limitations of Section 218.204 of this Part is required to meet the limitations of Subpart G (Section 218.301 or 218.302) of this Part, after the date by which the coating line is required to meet Section 218.204 of this Part

Permit Condition No. 11c

Condition 11c references monthly and annual limits on HAP emissions for both individual and combined HAP emissions. Additionally, this Condition also references the NESHAP for Surface Coating of Metal Coil (40 CFR 63, Subpart SSSS).

NACME Comment: Per our previous comments, while the language in the Condition referencing the non-applicability of the NESHAP for Steel Pickling Operations in 40 CFR 63, CCC is accurate there is no regulation that limits monthly or annual individual or combined HAP emissions other than maintaining these HAP emission levels below the major source levels of 10 tons per year of individual HAPs and 25 tons per year combined HAPs.

Therefore, in addition to the removal of the reference to the Surface Coating of Metal Coils that the IEPA has already agreed to, NACME requests that the monthly and annual emission limitations outlined in the current draft FESOP be removed. However, NACME understands the importance of minimizing the emissions of HAPs and would accept to have this Condition revised to limit individual HAP emissions to 9.0 tons per year and combined HAP emissions to 22.5 tons per year (below major source threshold levels) with no monthly limitations.

Permit Condition No. 13a and b/Permit Condition No. 14a and b

NACME Comment: As indicated in the comments regarding Permit Condition Nos. 2a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME request that Permit Condition Nos. 13a and b and 14a and b be removed from the FESOP.

Permit Condition No. 18/Permit Condition No. 19a and b/Permit Condition No. 20/Permit Condition No 25

NACME Comment: As indicated in the comments regarding Permit Condition Nos. 2a and b, 13a and b, and 14a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME request that Permit Condition Nos. 18, 19a and b, 20 and 25 be removed from the FESOP.

If you have any questions or require further information, please contact our consultant, Britt Wenzel of Mostardi Platt at 630-993-2123.

Respectfully Submitted,

Britt E. Wenzel

Britt Wenzel
Director, Environmental, Health & Safety Compliance Services

cc: J. DuBrock, National Processing Company
David Susler, National Material L.P.
Ms. Nancy Tikalsky, IAG

Attachment A – IDEM Technical Support Documents and USEPA Guidance on Metal Coil Coating Operations

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Ispat Inland, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake
Construction Permit No.:	CP-089-10472-00316
SIC Code:	3312
Permit Reviewer:	Bryan Sheets

The Office of Air Management (OAM) has reviewed an application from Ispat Inland, Inc. (Inland), relating to the construction and operation of the No. 6 Continuous Coating Line, which will galvanize steel sheets at a maximum capacity of 200,000 tons per year. The No. 6 Continuous Coating Line, consists of the following equipment:

(a) One (1) electrical resistance welder exhausting inside the building.

(b) One (1) alkali cleaning system, consisting of electrolytic and sodium hydroxide dunk tanks, and a brush scrubbers rinse tank, and exhausting inside the building.

(c) One (1) natural gas-fired strip dryer, identified as source ID 250, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(d) One (1) natural gas-fired radiant tube furnace heating section, identified as source ID 251A, with a heat input capacity of 102.05 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(e) One (1) natural gas-fired radiant tube furnace soaking section, identified as source ID 251B, with a heat input capacity of 5.4 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(f) Two (2) zinc pots, one (1) aluminum pot, one (1) zinc premelt pot, and one (1) aluminum zinc premelt pot, with electric induction heating for each pot, and all exhausting inside the building.

(g) One (1) natural gas-fired galvanneal soaking furnace, identified as source ID 252, with a heat input capacity of 6.5 million Btu per hour, and exhausting inside the building.

(h) One (1) natural gas-fired strip dryer, identified as source ID 253, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(i) One (1) chem-treat roll coating system with one (1) natural gas-fired strip dryer, identified as source ID 254, with a heat input capacity of 2.05 million Btu per hour, and exhausting inside the building.

(j) One (1) phosphate roll coating system with one (1) natural gas-fired infra-red furnace, identified as source ID 255, with a heat input capacity of 9.36 million Btu per hour, and exhausting inside the building.

(k) Three (3) electrostatic oilers exhausting inside the building.

(l) Natural gas-fired space heaters, identified as source ID 256, with a heat input capacity of 77.52 million Btu per hour, and exhausting through one (1) stack, identified as 256.

(m) One (1) natural gas-fired boiler, identified as source ID 257, with a heat input capacity of 22.95 million Btu per hour, and exhausting through one (1) stack, identified as 257.

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 December 17, 1998, with additional information received on January 25, 26 and 29, 1999.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (2 pages).

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)	79.75	7.5
Particulate Matter (PM10)	79.75	7.5
Sulfur Dioxide (SO_2)	0.6	0.6
Volatile Organic Compounds (VOC)	3.42	3.42
Carbon Monoxide (CO)	82.9	82.9
Nitrogen Oxides (NO_x)	211.5	211.5
Single Hazardous Air Pollutant (HAP)	1.78	1.78
Combination of HAPs	1.86	1.86

(a) Allowable PM emissions for the boiler are determined from the applicability of rule 326 IAC 6-2-4. Allowable PM emissions from the remaining facilities are determined from the applicability of rule 326 IAC 6-1-2. PM is assumed to equal PM_{10}. See attached spreadsheets for detailed calculations.

(b) The allowable emissions for the boiler and coating line based on the rules cited are greater than the potential emissions, therefore, the potential emissions are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of NOx are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. A portion of Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Portions of Lake County have also been classified as nonattainment for CO, PM_{10} and SO_2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) Inland is located in the portion of Lake County classified as nonattainment for the above mentioned pollutants.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1,089
PM10	1,089
SO_2	14,595
VOC	4,525
CO	5,434
NO_x	12,009

(a) This existing source is a major stationary source because it is in one of the 28 listed source categories and at least one regulated pollutant is emitted at a rate of 100 tons per year or more.

(b) These emissions were based on the Facility Quick Look Report, dated 1996.

Proposed Modification

PTE from the proposed modification (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)	PM_{10} (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	6.1	6.1	0.5	2.82	67.5	193.2
Contemporaneous Increases from No.1 Normalizer Preheater Furnace, Annealing Furnace for No.1 Normalizer, No. 5 Galvanizing Line Radiant Tube Furnace, HRCC Project and Vacuum Degasser (proposed)				22.8		
Contemporaneous Decreases						
Net Emissions	6.1	6.1	0.5	25.6	67.5	193.2
Emission Offset Significant Level	25	15	40	25	100	40

Note: The natural gas usage at the space heating unit will be limited to 300 MMCF per year. Therefore, Inland will have enough NO_X credits to meet the requirements of 326 IAC 2-3 (Emission Offset).

This modification to an existing major stationary source is major for VOC and NO_X because the emissions increases are greater than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-089-6577-00316) application on September 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

The 22.95 million Btu per hour boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Dc). However, there are no applicable requirements for a boiler that combusts only natural gas.

The application of rust preventative oils to the steel coils is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart TT) because this rule only applies to coating operations which use a curing oven and quench station as part of the process.

There are no other New Source Performance Standards (326 IAC 12) or National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61 and 63) applicable to this source.

State Rule Applicability

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offsets), the following requirements shall be satisfied:

(a) The applicant shall demonstrate that all existing major sources owned or operated by the applicant in the state of Indiana are in compliance with all applicable emissions limitations and standards contained in the CAA and in this title. The Office of Enforcement has stated that there are no outstanding or unresolved issues for Inland as of February 11, 1999. Therefore, this requirement has been satisfied.

(b) The applicant will apply emission limitation devices or techniques to the proposed construction or modification such that the lowest achievable emission rate (LAER) for the applicable pollutant will be achieved. Inland will substitute an additional 1.3 offset amount as allowed by 326 IAC 2-3-2(b)(3). Therefore, this requirement has been satisfied.

(c) The applicant shall submit an analysis of alternative sites, sizes, production processes, and environmental control techniques for such proposed source which demonstrates that benefits of the proposed source significantly outweigh the environmental and social costs imposed as a result of its location, construction, or modification. The OAM has reviewed and accepted the alternative site analysis submitted by Ispat Inland, Inc. Therefore, this requirement has been satisfied.

(d) VOC and NO_X emissions resulting from the proposed construction or modification shall be offset by a reduction in actual emissions of the same pollutant from an existing source or a combination of existing sources.

For severe ozone nonattainment the minimum offset requirement is 1.3 to 1. The following calculation demonstrates that Ispat Inland, Inc. shall meet this requirement:

	NO_x (tons/yr)	VOC (tons/yr)
Project Emissions	193.2	2.82
Required Offsets (Project Emissions x 2.6)*	502.3	7.3
Available Offsets	532.1	11.0
Shutdown of 76" Hot Strip Mill (in 1995)	353.9	11.0
Shutdown of 100" Plate Mill (in 1995)	122.7	
Shutdown of No. 4 Slabber Pits 19-45 (in 1996)	55.5	
Excess Emission Credits	29.8	3.7

* The emissions are multiplied by 1.3 as required by 326 IAC 2-3-3, and an additional 1.3 substituted for LAER, pursuant to 326 IAC 2-3-2.

Since the credits are greater than offsets required by this rule, Inland complies with the requirements of 326 IAC 2-3 (Offset Emissions). After completion of this proposed modification, Inland has available offset credits from the No. 4 Slabber Pits 19-45 in the amount of 29.8 tons of NO_x/yr and from the 76" Hot Strip Mill in the amount of 3.7 tons of VOC/yr.

326 IAC 2-6 (Emission Reporting)

These facilities are subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC and NO_x in Lake County . Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of the source. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 4-1 (Open Burning)

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 5-1 (Visible Emissions Limitations)

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

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

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

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Particulate matter emissions from all combustion facilities, excluding the boiler which is regulated by 326 IAC 6-2-4, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). These include all facilities exhausting to stacks 250 through 256. Particulate matter emissions from all other noncombustion facilities, including the electrical resistance welder and alkali cleaning system, shall not exceed 0.03 grains per dry standard cubic foot.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 22.95 MMBtu/hr natural gas-fired boiler is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.116 pounds per million BTU heat input because the source's total heat input capacity is 5465.3 MMBtu/hr. The limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ where Q = Total source heat input capacity (MMBtu/hr); and Pt = Allowable emission rate (lb/MMBtu)

326 IAC 6-4 (Fugitive Dust Emissions)

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 7-1.1 (Sulfur Dioxide Emission Limitation)

All of the combustion units associated with this project will be required to use natural gas as the only fuel. Therefore, the requirements of 326 IAC 7-1.1 will not apply.

326 IAC 8-2-4 (Coil Coating Operations)

The process of applying zinc, aluminum and oils to the steel coils are not subject to this rule because actual emissions of VOC from the coating operations will be less than 15 pounds per day.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 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 less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

(b) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of this continuous coating line will be subject to the conditions of the attached proposed **Construction Permit No. CP-089-10472-00316.**

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name:	**Syndicate Sales, Inc.**
Source Location:	**2025 North Wabash Street**
	Kokomo, Indiana 46901-2063
County:	**Howard**
SIC Code:	**3089, 3469**
Operation Permit No.:	**F067-7699-00026**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Syndicate Sales, Inc. relating to the operation of a stationary plastic container/pot and metal floral stem manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The source also consists of the following unpermitted facilities/units:

(1) one (1) flow coating line consisting of:
- (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
- (b) one (1) UV exposure room;
- (c) two (2) vacuum metallizers;
- (d) one (1) aqueous dye dip tank;
- (e) two (2) rinse tanks; and
- (f) one (1) electric drying oven.

(2) one (1) metal stamping press line consisting of:
- (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
- (b) one (1) packaging operation.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
(2) propane or liquefied petroleum gas, or butane-fired combustion sources with heat input less than six million (6,000,000) Btu per hour;
(3) combustion source flame safety purging on startup;
(4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
(5) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
(6) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
(7) machining where an aqueous cutting coolant continuously floods the machining interface;
(8) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
(9) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
(10) exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
(11) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
(12) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
(13) forced and induced draft cooling tower system not regulated under a NESHAP;
(14) paved and unpaved roads and parking lots with public access;
(15) enclosed systems for conveying plastic raw materials and plastic finished goods;
(16) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source;
(17) equipment used to collect released material;
(18) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
(19) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
(20) a laboratory as defined in 326 IAC 2-7-1(20)(C);
(21) a plastic molding operation, including five (5) plastic pellet storage silos and eighteen (18) plastic molding machines;
(22) a hot stamping operation, including five (5) hot stamp machines;
(23) a floral paper operation, including a waxer and a sheeter; and
(24) a stemming machine production line, including machining operations and a paint spray booth.

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to

receipt of the proper permit:

(1) one (1) flow coating line consisting of:
  (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
  (b) one (1) UV exposure room;
  (c) two (2) vacuum metallizers;
  (d) one (1) aqueous dye dip tank;
  (e) two (2) rinse tanks; and
  (f) one (1) electric drying oven.

(2) one (1) metal stamping press line consisting of:
  (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
  (b) one (1) packaging operation.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on September 26, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (2 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	225.7
CO	0.0

NO_x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
TOTAL	0.0

See attached spreadsheets for detailed calculations (2 pages).

(a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

(a) To simplify recordkeeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC to 91 tons per 12 consecutive month period. This limit was established at 11/12 ths of 99 tons per year to eliminate the effect that daily variations would have on any 365 day period. This limit consists of:

(i) 90.56 tons per year for the significant activities; and

(ii) 0.44 tons per year for the insignificant activities.

(b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Flow Coater	0.0	0.0	0.0	65.76	0.0	0.0	0.0
Metal Stamping Presses	0.0	0.0	0.0	24.80	0.0	0.0	0.0
Insignificant Activities	0.0	0.0	0.0	0.44	0.0	0.0	0.0

Total Emissions	0.0	0.0	0.0	91.00	0.0	0.0	0.0

Attached Table A summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Howard County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The metal stamping press line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT), "Standards of Performance for Metal Coil Surface Coating". This rule applies to each prime coat operation, each finish coat operation, and each prime and finish coat operation combined, when the finish coat is applied wet over the prime coat, and both coatings are cured simultaneously. Where only a single coating is applied to the metal coil, that coating is considered a finish coat. The definition of a finish coat operation is the coating application station, curing oven, and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping press line only involves coating the metal coil with a petroleum lubricating oil to facilitate the shaping and cutting of the coil into floral stems in the stamping presses. There are no curing ovens or quench stations associated with this process. The metal stamping press line does not fall under the definition of a finish coat operation, therefore, the requirements of 40 CFR 60.460, Subpart TT do not apply.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or

processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of volatile organic compounds (VOC) to below 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, source wide VOC emissions must be limited to no more than 99 tons per year. The source has accepted a VOC usage limitation for the Flow Coater (ID No. 1) of 65.76 tons per 12 consecutive month period. By accepting this VOC usage limitation for the Flow Coater (ID No. 1), source wide VOC emissions are limited to 91.0 tons per 12 consecutive month period, thus the source satisfies the requirements of 326 IAC 2-8-4 and the requirements of 326 IAC 2-7 do not apply. These limitations will also render 326 IAC 2-2 not applicable.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The flow coater is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the flow coater are 200.44 tons per year. Since the potential VOC emissions are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 apply to the flow coater.

Syndicate Sales, Inc. has submitted a BACT analysis, dated February 19, 1996, as part of this FESOP application.

The options considered in the BACT analysis for the flow coater are:

(1) Recuperative Thermal Incineration
(2) Regenerative Thermal Incineration
(3) Recuperative Catalytic Incineration
(4) Regenerative Catalytic Incineration
(5) Flare
(6) Other Innovative Destruction Technologies

(7) Carbon Adsorption
(8) Absorption
(9) Condensation
(10) Carbon Adsorption with Recuperative Thermal Incineration
(11) Absorption and Incineration

It was determined that options 8, 10 and 11 are technically infeasible due to the following reasons:

(6) None of the innovative destruction technologies such as biofilters or systems applying ultraviolet radiation seem well documented, in particular, process cost information is lacking. These options were not considered to be commercially available.

(10) The combination of carbon adsorption with thermal oxidation is not a suitable VOC control technology for the flow coater because the inlet VOC concentration is too high. The VOC concentration in the desorb stream would exceed 25% of the LEL, making the concentrated stream unsuitable for thermal oxidation.

(11) Absorption concentrators are typically suited for batch processes or to equalize pollutant concentrations in a variable stream. The physical characteristics that drive the absorption of pollutants into a liquid also limit the opportunity to remove these pollutants from the liquid stream. Because the combination of absorption with incineration has only limited application, it was not considered feasible.

The technically feasible options are recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration, a flare, carbon adsorption, absorption, and condensation. A cost analysis was performed to determine the economic feasibility of these control options for the flow coater VOC emissions. The cost analysis is based on a federally enforceable limited VOC throughput of 65.76 tons per year for the flow coater.

The tables below show the results of the cost analysis.

(A) Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Incineration	(1)	(1)	(1)	296,596
Regenerative Thermal Incineration	(1)	(1)	(1)	509,598
Recuperative Catalytic Incineration	(1)	(1)	(1)	218,923
Regenerative Catalytic Incineration	(1)	(1)	(1)	171,417
Absorption	(1)	(1)	(1)	2,592,442
Carbon Adsorption	(1)	(1)	(1)	124,275
Condensation	(1)	(1)	(1)	281,923

Flare	(1)	(1)	(1)	167,082

(1) Total Capital Cost includes Base Price, Direct Cost and Indirect Cost.

(B) Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Incineration	12,814	16,033	48,270	77,117
Regenerative Thermal Incineration	9,180	24,553	82,935	116,668
Recuperative Catalytic Incineration	15,097	12,926	33,994	62,017
Regenerative Catalytic Incineration	15,404	11,026	26,263	52,693
Absorption	13,255	107,867	421,908	543,030
Carbon Adsorption	198,222	9,140	19,270	226,632
Condensation	136,899	15,446	45,882	198,227
Flare	427,617	10,853	21,967	460,436

(C) Evaluation

Option	Limited Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton Removed
Recuperative Thermal Incineration	65.76	62.47	95	1,234
Regenerative Thermal Incineration	65.76	62.47	95	1,868

Recuperative Catalytic Incineration	65.76	62.47	95	993
Regenerative Catalytic Incineration	65.76	62.47	95	843
Absorption	65.76	64.44	98	8,427
Carbon Adsorption	65.76	62.47	95	3,628
Condensation	65.76	46.03	70	4,306
Flare	65.76	64.44	98	7,145

Methodology:
Emissions removed = (limited potential emissions from warehouse) * (control efficiency)
$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
   a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
   b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
   c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost
   a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
   b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

From the cost analysis, six technology options appear to offer cost effectiveness less than $5,000 per ton. Absorption and flare options are not cost effective. Carbon adsorption and condensation have marginal cost effectiveness, however, thermal destruction methods offer such greater cost effectiveness than the reclamation options that only the destruction methods were considered further. The annual cost of the destruction methods were compared to Syndicate Sales, Inc.'s average net profit before taxes for 1992 through 1995. The results expressed the total annual cost of the control options as a percentage of the average net profits before taxes for 1992 through 1995. The table below summarizes these results.

Control Option	Capital Cost	% of Net Profit	Annual Cost	% of Net Profit
Recuperative Thermal Incineration	296,596	514	77,117	133
Regenerative Thermal Incineration	509,598	882	116,668	202

Recuperative Catalytic Incineration	218,923	379	62,017	107
Regenerative Catalytic Incineration	171,417	297	52,693	91

Based on this information, none of these control options are economically feasible. Because all options are either technically infeasible or economically infeasible, no VOC emission control has been determined to be BACT. Also, because the BACT analysis was based on an enforceable limited VOC throughput of 65.76 tons per year for the flow coater, this throughput limitation is part of the BACT determination. Thus, in summary, BACT for the flow coater has been determined to be a limited VOC throughput of 65.76 tons per year, no add-on controls, and the following work practices:

(1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;

(2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

The metal stamping press line is not subject to the requirements of 326 IAC 8-1-6 since potential VOC emissions from the three (3) stamping presses (ID Nos. 2, 3, and 4), constructed in 1982, are less than 25 tons per year.

326 IAC 8-2-4 (Coil Coating Operations)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-4 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-9 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

There are no other 326 IAC 8 rules that apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds

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

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

The flow coater (ID No. 1) has applicable compliance monitoring conditions as specified below:

(a) Total VOC usage in the flow coater shall be limited to 65.8 tons per twelve (12) consecutive month period, rolled on a monthly basis.

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include annual VOC usage, rolled on a monthly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

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) FESOP Application Form GSD-08.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this plastic container and metal floral stem manufacturing operation will be subject to the conditions of the attached proposed **FESOP No. F067-7699-00026.**

Table A

Stack/Vent ID: Vent 1				
Stack/Vent Dimensions:	**Ht: 35'**	**Dia: 16"**	**Temp: 77°F**	**Flow: 1,980 acfm**
Emission Unit: Flow Coater				
Date of Construction: 7/83				
Alternative Scenario: N/A				
Pollution Control Equipment: N/A				
General Description of Requirement:	VOC usage limitation			
Numerical Emission Limit:	65.8 tons/yr			
Regulation/Citation:	326 IAC 2-8 and 326 IAC 8-1-6			
Compliance Demonstration:	Record keeping and Reporting			
PERFORMANCE TESTING	N/A			
Parameter/Pollutant to be Tested:				
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	record keeping and reporting			
Monitoring Method:				
Monitoring Regulation/Citation:				
Monitoring Frequency:	monthly			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC usage per month			
Recording Frequency:	monthly			
Submittal Schedule of Reports:	quarterly			
REPORTING REQUIREMENTS				
Information in Report:	VOC usage per month			
Reporting Frequency/Submittal:	quarterly			
Additional Comments:				

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Kasle Metal Processing**
Source Location:	**5146 Maritime Road, Jeffersonville, IN 47130**
County:	**Clark**
SIC Code:	**3479**
Operation Permit No.:	**019-22372-00119**
Permit Reviewer:	**James Farrell**

The Office of Air Quality (OAQ) has reviewed an application from Kasle Metal Processing relating to the construction and operation of a steel blanking facility. The steel blanking process shapes steel coils into blanks and then applies a non-HAP surface coating as a rust preventative.

New Emission Units and Pollution Control Equipment

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

(a) Two (2) EGL-1 application lines, applying rust preventive surface coating to steel blanks, (identified as EGL Application Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(b) Two (2) wash lines (identified as Wash Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(c) Two (2) 2.5 MMBtu Natural gas-fired boilers, identified as Boiler 1 and 2, using no control, exhausting to the atmosphere.

(d) Four (4) 1.55 MMBtu Natural gas-fired Air Make-Up Units, with no unit I.D.'s and using no control, exhausting to the atmosphere.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on December 15, 2005.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The calculations can be found in the application file.

Potential to Emit Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions 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, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	0.38
PM-10	0.38
SO_2	0.03
VOC	3.17
CO	4.12
NO_x	4.91

HAPs	Potential to Emit (tons/yr)
Single HAP	<10
Combination HAPs	<25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Clark County.

Pollutant	Status Status
PM-10	Attainment
PM-2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

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

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	<5
PM-10	<5
SO_2	<10
VOC	<10
CO	<25
NO_x	<10
Single HAP	<10
Combination HAPs	<25

(a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:
(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.460, Subpart TT – Standards and Performance for Metal Coil Surface Coating Operations, which applies to prime coat, finish coat and prime and finish coat combined operations because it is not a prime or finish coat operation. Therefore, this NSPS is not included in this exemption.

(b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to steam generating units constructed, modified or reconstructed after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr) because each of the boilers have heat input values of less than 10 million Btu/hr. Therefore, this NSPS is not included in this exemption.

(c) The metal coil surface coating unit is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM – (Surface Coating of Miscellaneous Metal Part and Products) because it does not apply topcoat to automobile or light-duty truck body parts and is not a major source of HAPs..

(d) The metal coil surface coating unit is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart SSSS – (Surface Coating of Metal Coil) because it is not a major source of HAPs.

(e) The two (2) 2.5 MMBtu/hr boilers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart DDDDD – Standards for Industrial, Commercial and Institutional Boilers and Process Heaters, because it is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)
This source is not required to have an operating permit under 326 IAC 2-7, does not emit lead into the ambient air at levels $\geq$ 5 tpy, and is located in Clark County. Therefore, 326 IAC 2-6 does not apply.

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.

State Rule Applicability – Individual Facilities

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

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))
Pursuant to 326 IAC 6-2-4(a) particulate emisisons from indirect heating constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where

Q = total source heat input capacity (MMBtu/hr)
Pt = emission rate limit (lbs/MMBtu)

Therefore, particulate emissions from the two (2) 2.5 MMBtu/hr boiler shall not exceed 0.6 lb/mmBtu heat input because the total source maximum operating capacity heat input for indirect heating is less than 10 MMBtu/hr.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))
This rule is not applicable to the air make-up units because they are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 do not apply to the air make-up units.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 6-3-1(b)(1), the two (2) 2.5 MMBtu boilers are exempt from the requirements of 6-3-1 because it uses combustion for indirect heating. Therefore, the requirements of 326 IAC 6-3-1 do not apply to the boilers.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
The emission units at this source have negligible Particulate emissions. Therefore the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The potential emissions from this steel blanking facility are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-1 (Surface Coating Emissions Limitations)
This source is located in Clark County, the potential to emit of VOC from the facility is less than twenty-five (25) tons per year and actual emissions are less than fifteen (15) pounds per day. Therefore, pursuant to 326 IAC 8-2-1, 326 IAC 8-2-4 (Coil Coating Operations) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) do not apply.

326 IAC 8-7-1 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This source is located in Clark County, and the potential to emit of VOC is less than 100 tons per year and the coating facility has less than ten (10) tons per year of VOC. Therefore, 326 IAC 8-7-1 does not apply.

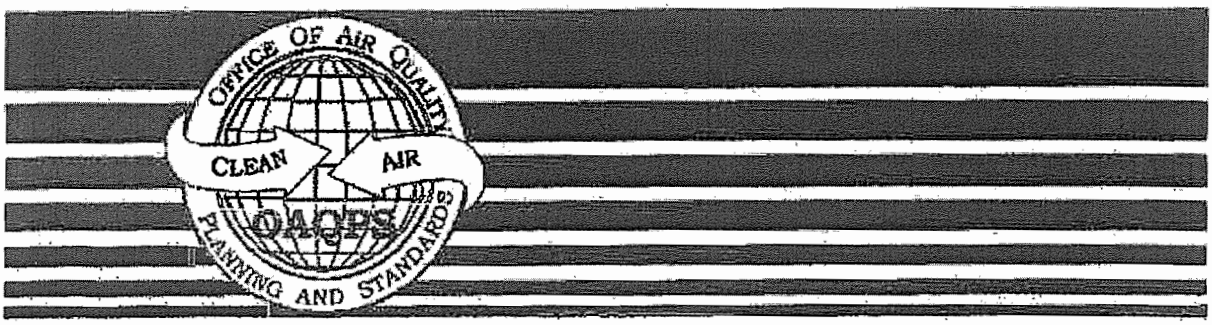
Conclusion

The construction and operation of this steel blanking facility shall be subject to the conditions of the Exemption 019-22372-00119.

United States Environmental Protection Agency | Office of Air Quality Planning and Standards Research Triangle Park, NC 27711 | EPA-453/P-00-001 April 25, 2000 http://www.epa.gov/ttn/uatw

National Emission Standards for Hazardous Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards

See generally the discussion at 3-1 Thru 3-10 / where entire reference to "coating liner" includes curing oven and quenching station.



3.0 METAL COIL COATING INDUSTRY PROFILE AND PROCESS DESCRIPTION [1,2]

3.1 GENERAL PROCESS DESCRIPTION

The metal coil surface coating source category includes any facility engaged in the surface coating of metal coil. In this process, a coil or roll of uncoated sheet metal is coated on one or both sides and repackaged as a coil or otherwise handled. Although the physical configuration of the equipment used in coil coating lines varies from one installation to another, the individual operations generally follow a set pattern. The coil coating process begins with a coil (or roll) of bare sheet metal and, in most cases, terminates with a coil of metal with a dried and cured coating on one or both sides. The metal strip is unrolled from the coil at the entry to the coil coating line and first passes through a wet section, where the metal is cleaned and may be given a chemical treatment to inhibit rust and promote adhesion of the coating to the metal surface. In some installations, the wet section may also contain an electrogalvanizing operation in which zinc is applied through an electroplating process to a steel substrate. After the metal strip leaves the wet section, it is squeegeed and air dried and then passes to a coating applicator station.

Coating application stations may be used to apply a variety of coatings. In addition to protective or decorative coatings, adhesives and printed patterns using ink may also be applied. The most prevalent operation includes the application of protective and decorative coatings to one or both sides of the metal strip using rollers. Following the coating application, the strip passes through an oven where the temperature is increased to the desired curing temperature of the coating. The strip is then cooled by a water spray, air spray, or combination of the two. If the line is a tandem line, the first coating application is a prime coat and the metal strip next enters another coating applicator station where a top or finish coating is applied by rollers to one or both

sides of the metal. The strip then enters a second oven for drying and curing of the top or finish coat. This is followed by another cooling or quench station. The finished metal strip is then normally rewound into a coil and packaged for shipment or further processing. In some cases, the coated metal strip may be cut rather than rerolled into a coil. Most metal coil surface coating lines have accumulators at the entry and exit that permit the strip to move continuously through the coating process while a new coil is mounted at the entry or a full coil removed at the exit. Figure 3-1 is a schematic diagram of a typical, tandem coil coating line.

For existing coil coating lines, processing speed varies considerably, with some lines having processing speeds as high as 1,200 feet per minute[3]. The widths of the metal strip vary from a few inches up to 6 feet, and thickness may vary from about 0.006 inch to more than 0.15 inch. The lower thickness of 0.006 inch has been considered to be the line of distinction between metal coil and foil. However, 5 facilities have been identified that process coiled metal with a thickness both above and below 0.006 inch. Three of these facilities process 5 percent foil on each line, the fourth facility processes less than 25 percent foil on one of 6 coating lines in the facility, and the fifth facility processes 86 percent foil on one of 9 coating lines in the facility. The processing of foil is considered to be part of the paper and other web surface coating source category. Thus, there is some overlap between coil coating processes and foil coating processes within individual coil coating facilities. Unless a facility reported 100% of its substrate(s) as being below 0.006 inch, the facility was considered to be part of the metal coil surface coating source category.

3.2 INDUSTRY PROFILE

A total of 110 companies performing metal coil surface coating operations were identified through literature sources and stakeholder contacts. Information collection requests (ICRs) were sent to each of these companies in the summer of 1998. The intent of the survey was to acquire data on HAP use and emission control in metal coil surface coating operations and associated ancillary activities such as storage of HAP-containing materials in tanks, wet section operations, equipment cleaning, and wastewater treatment.

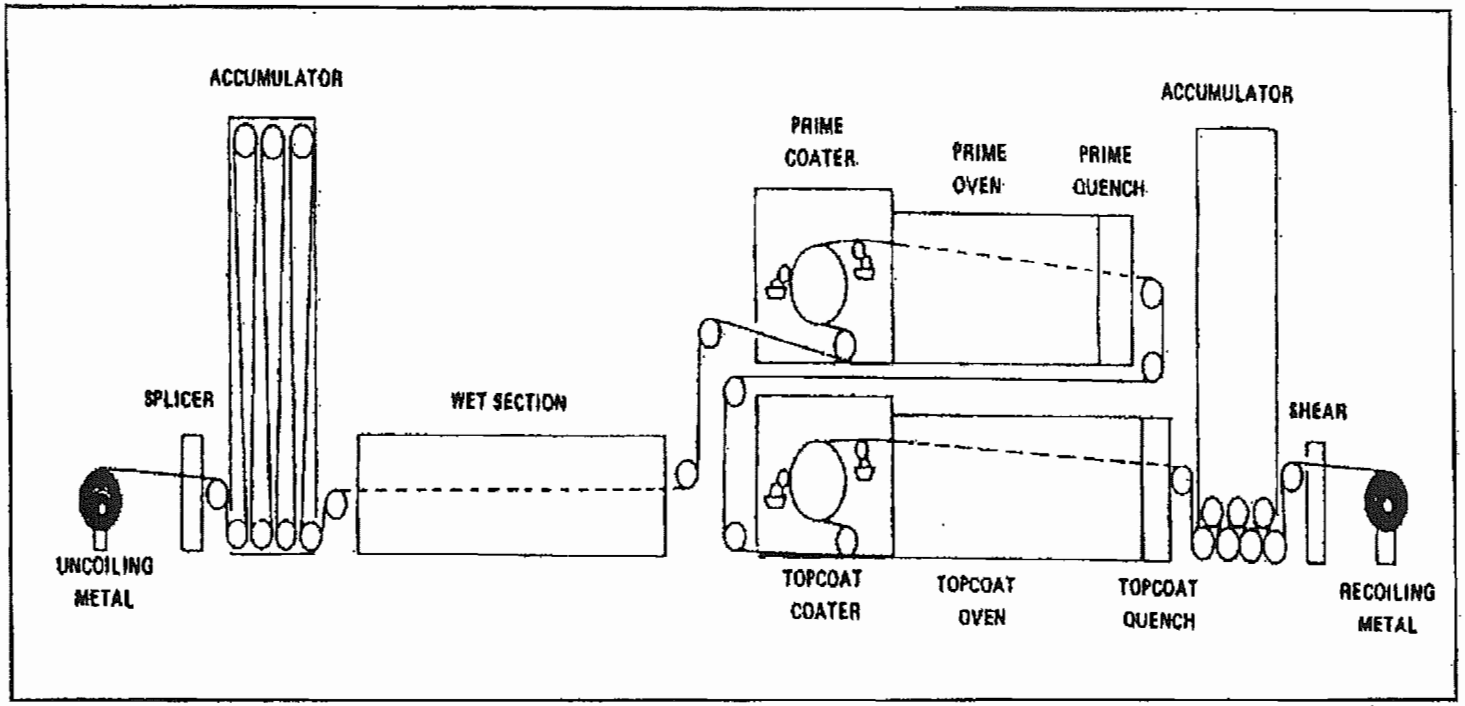


Figure 3-1. Typical Tandem Coil Coating Line

Responses were received from 119 facilities, of which 26 indicated that the facilities are not coil coaters, 2 provided information showing that the facility only coats foil, and two were not in operation in 1997. Therefore, 89 coil coating facilities returned completed questionnaires; 14 companies did not respond to the questionnaire.

The information collected from the metal coil surface coating industry was entered into a database. The metal coil surface coating MACT database (MACT database) contains a total of 82 facilities, excluding 7 facilities that classified the entire ICR response confidential business information (CBI). The MACT database facilities had a total of 125 coating lines reported. Appendix B of this document contains information on plant location, number of lines, type of control device used, and annual HAP emissions.

Major markets for coil coated metal include the transportation industry, building products industry, large appliance industry, can industry, and packaging industry. Other end products include coated tape rules, ventilation systems for walls and roofs, lighting fixtures, office filing cabinets, cookware, and sign stock. The industry has maintained a positive growth rate for a number of years as new end uses for precoated metal have continued to emerge.

Although coil coated metal is used in a wide variety of products, metal coil surface coating is typically not a product specific operation but rather is a distinct process. Many of the other surface coating source categories being regulated under section 112 of the Act are product specific, such as the metal can and large appliances source categories. For the purposes of standard development, the EPA considers any coil coating process, regardless of the end product, as part of the metal coil source category. Product-specific source categories include surface coating operations that are not coil coating processes.

Types of metal processed by the coil coating industry are mainly aluminum, cold rolled steel, cold rolled steel (galvanized on-line), hot-dipped galvanized steel, and galvalum/zincalum. Small quantities of other metals including brass are also coated. Coil coated metal is fabricated into end products after it is coated, thus eliminating the need for post-assembly painting. Toll and captive coaters represent the two basic industry divisions. Toll coaters produce metal that is coated in accordance with specifications of their customers. Captive coaters both coat the metal and fabricate it into end products within the same company. Examples of captive coaters are can manufacturers who have dedicated coil coating lines for metal used in the can manufacturing

process, and housing products manufacturers who coat the material for their products using company owned and operated coil coating lines. Some plants perform both toll and captive operations. Data from the MACT database indicate that approximately 40% of the facilities reported being toll coaters, 38% reported being captive coaters, and 22% reported performing both toll and captive coating.

3.3 COATINGS

The types of coatings applied in coil coating operations include a wide variety of formulations. Among the more prevalent types are polyesters, acrylics, fluorocarbons, alkyds, vinyls, epoxies, plastisols, and organosols. Table 3-1 lists the coatings commonly used in the industry and gives the approximate range of organic solvent content of each. In addition to these traditional coatings, adhesives, bondable backers, strippable protective coatings, lacquers, teflons, liquid rubber, graphite, kynar, latex, extruded synthetic rubber-based solid resins, and other non-traditional coatings are also used by the industry [5]. The majority of the coatings, estimated at about 85 percent [6], are organic solvent based and have solvent contents ranging up to 80 percent by volume with most being in the range from 30 to 70 percent. The remaining 15 percent of coatings are mostly of the waterborne type which also contain some organic solvents ranging from about 2 to 15 percent by volume [7]. While waterborne coatings are in use at a number of coil coating facilities, they are not available in formulations that are suitable for all end product applications. The choice of waterborne versus solvent borne coatings usually depends on the end use of the coated metal and the type of metal used. The most prevalent use of waterborne coatings is on aluminum used for siding in the construction industry. Other uses include printing plates, suspended ceiling systems, and body and endstock for food cans.

High-solids coatings in the form of plastisols, organosols, and powder are also used to some extent by the coil coating industry. Because these coatings have a lower organic solvent content, potential organic emissions are lower than from the other, more commonly used coatings. However, these coatings also have limited applicability and are not available in formulations suitable for use on all end products. Typical uses for these coatings are residential siding, drapery hardware, and other products.

Little data have been identified that represent the HAP content of coatings used in the

metal coil surface coating industry. Information provided by one of the coating suppliers [8] for three typical coatings showed HAP contents ranging from about 5 to 28 percent by weight. Reported data from the MACT database indicate that HAP contents for all coatings used in the coil coating industry range from 0 to 95 percent by weight, with an average reported value of approximately 16 percent.

Table 3-1. Typical Coatings Used in Metal Coil Surface Coating

Coatings	Volatile Content (Weight %)
Acrylics	40-45
Adhesives	70-80
Alkyds	50-70
Epoxies	45-70
Fluorocarbons	55-60
Organosols	15-45
Phenolics	50-75
Plastisols	5-30
Polyesters	45-50
Silicone Acrylics & Polyesters	35-60
Urethanes	60-75
Inks	50-65
Solution Vinyls	75-85
Vinyls	60-75

Source: Reference 4.

3.4 PROCESS DESCRIPTIONS, CURRENT INDUSTRY PRACTICES, AND EMISSION SOURCES

Although specific steps in a coil coating operation differ between plants, most have a common series of steps that include storage and handling of raw materials and a coating line that includes a wet section and one or more coating operations consisting of a coating application station, a curing oven, and a quench area. Most plants also generate wastewater and have some

type of wastewater treatment system. The following paragraphs provide brief descriptions of the common operations found on coil coating lines and provides general information regarding potential HAP emissions.

3.4.1 Storage and Handling of Coatings and Other Materials

Many of the coatings, solvents, and wet section chemicals are delivered and stored in 55 gallon drums but may also be delivered and stored in totes, which are transportable containers with a capacity generally in the range of from 200 to 500 gallons. Some plants also receive raw materials in bulk by tank trucks or rail cars and store the materials in bulk storage tanks. These tanks may be located inside a building or may be outdoors either above ground or underground. For raw materials delivered and stored in drums or totes, no emissions should occur during normal storage provided that they typically are kept sealed and generally do not leak. Emissions would only occur when the drums or totes are opened.

Where coatings are delivered by tank truck or rail car, working loss emissions occur when the coatings are pumped from the delivery vehicle to bulk storage tanks. Some tanks are vented to the tank trucks while they are being filled, thus making working losses negligible. During storage, daily temperature fluctuations generate breathing loss emissions. Breathing losses would be expected to be low for tanks that are underground or enclosed in controlled temperature environments relative to tanks that are outdoors, above ground and exposed to diurnal temperature cycles. Based on data from the MACT database, emissions from storage tanks account for approximately 2% of nationwide HAP emissions from metal coil surface coating operations.

Before application of the coatings to the coil, the coatings are typically stirred. They may also be thinned with solvent to adjust the viscosity. In some cases, coatings are mixed together. One example is mixing to achieve a particular color. Another example is the blending of excess coatings together to use as a backer. Another coating modification operation, intermixing, involves adding ingredients to perform coating color tinting (with no pigment dispersion). Data from ICR responses indicate that emissions from mixing and thinning account for approximately 3.5% of nationwide HAP emissions from metal coil surface coating operations.

3.4.2 Wet Section Pretreatment

The wet section of a metal coil surface coating line includes cleaning steps that may use

water, caustic cleaners, brushing, or acid treatment. Processes may include spray applications of materials or may include submersion of the metal strip. Specific processes included in the wet section depend on the type of metal substrate, characteristics of the coatings to be applied, and other parameters. The chemical treatments used in the wet section may contain HAP. Data from ICR responses indicate that HAP emissions from wet section operations account for approximately 0.29% of nationwide HAP emissions from metal coil surface coating operations.

3.4.3 Coating Application Stations

At the coating application stations, coatings are applied by rollers to one or both surfaces of the metal strip as it passes through the station. Emissions of HAP occur when HAP-containing solvents contained in the applied coatings evaporate. It is estimated that between 0 and 15 percent of the coating solvent evaporates at the coating station [9]. Data from the MACT database indicate an average of approximately 9.1 percent of coating solvent evaporation taking place at the coating station. If HAP-containing cleaning solvents are used, emissions of HAP also occur during cleaning of the paint rollers and other parts of the application station between coating sessions or when a color change is made. Cleaning may be carried out in place using solvent and rags, or portions of the coaters may be removed for cleaning. Data for HAP emissions from parts and equipment cleaning were available for 40 percent of the facilities that returned ICR responses. For these facilities, parts and equipment cleaning HAP emissions account for approximately 4 percent of nationwide HAP emissions from metal coil surface coating operations.

At many plants, the coating application stations are enclosed in rooms. Because air is drawn into the ovens from these rooms, it is generally believed that a large fraction, and in some cases all, of the solvent that evaporates in this area is captured by the ovens. Hoods or "snouts" may be used to increase the fraction of solvent emissions captured by the ovens. Plants may also use smaller coating station enclosures, which require less ventilation air, and are not occupied by workers except when the enclosure is opened for maintenance or inspection. On lines that do not have coating rooms or smaller enclosures, an exhaust hood is frequently installed directly over the roll coaters to exhaust the solvent that evaporates in that area. In these cases, the hoods may be exhausted to the ovens, a control device, or to the atmosphere. Some plants do not use hoods or enclosures around the coating application stations; therefore, the majority of the solvent evaporated at the coating station would be emitted to the atmosphere. Data from the MACT

database indicate that permanent total enclosures, partial enclosures, hoods, floor sweeps, extra ventilation to control devices, walls around coating stations, and oven extensions are used throughout the metal coil coating industry as enclosure and capture methods.

3.4.4 Curing Ovens

After coatings are applied to the surface of the metal strip, the strip enters an oven where heat is applied to evaporate the organic solvent and water contained in the applied coatings. An estimated 85 to 100 percent of the organic solvent content of applied coatings evaporate inside the curing ovens [10]. Data from the MACT database indicate an average of approximately 90 percent of the organic solvent content of applied coatings evaporating inside the curing ovens. Most curing ovens used in coil coating operations are direct fired and use natural gas as fuel. Many ovens are designed to use propane as a backup fuel in case of natural gas curtailments. Ovens heated by fuel oil or electricity are used in some plants, but to a much lesser extent than those heated by natural gas. The heat input to the ovens must be sufficient to evaporate the solvent in the coatings, to bring the metal and coatings up to the design temperature, usually in the range of 375 to 600 °F, to replace the heat lost from the ovens by radiation and conduction, and to heat dilution air to oven operating temperature. Oven ventilating air (or dilution air) is normally the largest single factor in the total oven heat load. Data from the MACT database indicate an average oven exhaust gas temperature of approximately 560 degrees Fahrenheit.

Solvent borne coatings, if uncontrolled, would result in higher organic emissions from the oven than either waterborne coatings or high solids coatings. Emissions of HAP compared to organic emissions depend on the proportion of HAP as compared with non-HAP solvents in the coatings.

3.4.5 Quench Area

When the metal strip exits the curing oven, it is cooled, usually by a water spray, an air spray, or a combination of the two before being repackaged as a coil or passing to another coating station. An estimated 0 to 2 percent of the organic solvent in the applied coatings is released in the quench area [11]. Data from ICR responses indicate an average of approximately 0.6 percent of the organic solvent in the applied coatings is released in the quench area. The quench area is normally an enclosed area adjacent to the exit from the curing oven and a large fraction of the emissions released in this area are estimated to be captured by the oven ventilation system.

However, at some plants, the quench area is vented directly to the atmosphere.

3.4.6 Wastewater Handling and Treatment

Most plants generate wastewater from wet section operations, quenching operations, or both. Based on data from ICR responses, organic solvents are not typically used in the wet section. Consequently, not much organic solvent gets into plant wastewater. Response data from the ICRs indicate that wastewater handling and treatment operations account for approximately 0.07 percent of nationwide HAP emissions from metal coil coating operations. Coil coating wastewater may contain chromium compounds, but the potential for air emissions of these compounds is small. Wastewater may also be generated by clean up activities at plants that use waterborne coatings.

3.4.7 Baseline Emissions

Information collection requests were sent to 110 companies performing metal coil coating operations that were identified through literature sources and stakeholder contacts. Responses were received from 119 facilities. Twenty-six of those facilities indicated that they are not coil coaters, 2 provided data showing that the facility coats foil only, and two facilities were not in operation in 1997. Therefore, 89 coil coating facilities returned completed ICRs; 14 companies did not respond to the questionnaire. The surveyed facilities were asked to provide facility HAP emissions from metal coil surface coating operations as well as HAP emissions from specific unit operations associated with metal coil surface coating. Total nationwide HAP emissions from metal coil surface coating operations were calculated to be 2484 tons in 1997 by summing facility HAP emissions reported by these facilities.

3.5 REFERENCES

1. U.S. Environmental Protection Agency. Metal Coil Surface Coatings MACT Docket Number A-97-47 Item Numbers II-D-1 through II-D-113. ICR Responses. Office of Air Quality Planning and Standards. Research Triangle Park, NC. Responses received September 1998-April 1999.

2. U.S. Environmental Protection Agency. Metal Coil Surface Coating Industry-Background Information for Proposed Standards. Office of Air Quality Planning and Standards. Research Triangle Park, NC. EPA-450/3-80-035a. October 1980.

3. Reference 1.

4. Reference 2, p. 3-4 updated with information from Reference 1.

5. Reference 1.

6. Reference 2, p. 3-2.

7. Reference 2, p. 3-2 and 3-5.

8. Letter from Jelf, III, William E., Akzo Nobel Coatings, Inc. to Lacy, Gail, US EPA. September 12, 1997. Data sets for three (3) typical coil coatings.

9. Reference 2, p. 3-7.

10. Reference 9.

11. Reference 9.

EXHIBIT E

Walsh III, Edward V.

From: Brodsky, Valeriy [Valeriy.Brodsky@Illinois.gov]
Sent: Friday, June 15, 2012 10:25 AM
To: BWenzel@mp-mail.com
Cc: Walsh III, Edward V.; dsusler@nmlp.com; O'Meara, Robert S.; jdubrock@nmlp.com; Bernoteit, Bob
Subject: RE: NACME (I.D. No. 031600FWL) Comments to Draft FESOP

Britt,

Your main argument against NSPS Subpart TT applicability is the absence of curing and quenching stations in the NACME finish coat protective oil application operations. In 1988 the US EPA Region 5 made Applicability Determination on the performance testing for coil coating line which does not have a curing oven without questioning the NSPS Subpart TT applicability (see attached). The Permit Section position is that the components listing of the affected facility being subject to emission standard does not relieve the whole facility from applicability on the ground of the absence of some components.

Sincerely,

Valeriy Brodsky
Environmental Protection Engineer
Illinois EPA, Bureau of Air

Telephone: 217/785-1738
Fax: 217/524-5023
e-mail: Valeriy.Brodsky@illinois.gov

U.S. Environmental Protection Agency Applicability Determination Index
Control Number: NR41

Category: NSPS

EPA Office: Region 5

Date: 09/19/1988

Title: NSPS Applicability to Coil Coating Operations

Recipient: Sweitzer, Terry A.

Author: Kertcher, Larry F.

Subparts: Part 60, TT, Metal Coil Surface Coating

References:

60.460,
60.463
(i)

Abstract:

Does Subpart TT regulate VOCs emitted or applied?

The intent of Subpart TT is to regulate the VOCs applied and not the VOCs emitted from application. Also, testing using a temporary enclosure on only the coating applicator discounted the VOCs resulting from the subsequent evaporation of organic solvents in the coating, and does not satisfy the performance test requirements of 40 CFR 60.463(i)(B).

Letter:

Control Number: NR41

September 19 1988

Region 5
Terry Sweitzer, P.E.
Manager of Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19276
Springfield, Illinois 62794-9276
Dear Mr. Sweitzer:

This letter is in response to your request for review of the applicability and compliance procedures of 40 C.F.R. 60 Subpart TT (60.460-60.466) - Standards of Performance for Metal Coil Coaters as applied to coil coating operations at Olin Corporation.

Olin has applied for a permit (Permit No. 72-08-003) to install and operate a coil coater on the #8 strip anneal that will be controlled with an activated carbon filter. The coating station does not have a flash off area or a curing oven. Based on a performance test done using a temporary enclosure on the coating applicator only, the VOC emissions were found to be 0.88 pounds per hour. Olin proposes to control 95% of that amount. However, the total amount of VOCs applied is 5.3 pounds per hour and according to Olin, it can be assumed that all the VOCs will evaporate.

It is U.S. Environmental Protection Agency's interpretation that the intent of 40 C.F.R. 60 Subpart TT is to regulate the VOCs applied and not the VOCs emitted from the application as Olin claims. Also, during the performance test, Olin by having temporary enclosure on the coating applicator only, has discounted the VOCs resulting from the subsequent evaporation or organic solvents in the coating. Based on these facts, U.S. EPA believes that the performance test does not satisfy the requirements of 40 C.F.R. 60 Section 60.463(i)(B).

If you have any questions or comments, please contact Spiros Bourgikos of my staff at (312) 886-6862.

Sincerely yours,
(signed)
Larry F. Kertcher, Chief
Air Compliance Branch (5AC-26)

EXHIBIT F

Walsh III, Edward V.

From: BWenzel@mp-mail.com
Sent: Wednesday, June 27, 2012 10:12 AM
To: Brodsky, Valeriy
Cc: dsusler@nmlp.com; Walsh III, Edward V.; jdubrock@nmlp.com; O'Meara, Robert S.
Subject: RE: NACME (I.D. No. 031600FWL) Comments to Draft FESOP
Attachments: NACME Draft FESOP Response Letter 3_0626 FINAL.pdf

Mr. Brodsky:

Attached please find the response to your June 15, 2012 email regarding the Draft FESOP issued to the NACME Steel Processing, LLC facility (I.D. No. 031600FWL). Please review and contact me with any questions or additional comments. The original letter has been sent in the mail. .

(See attached file: NACME Draft FESOP Response Letter 3_0626 FINAL.pdf)

mostardi platt
Britt E. Wenzel
bwenzel@mp-mail.com
t: 630-993-2123 *m*: 630-688-1799 *f*: 630-993-9017
888 Industrial Drive Elmhurst IL 60126
www.mostardi-platt.com

mostardi platt

June 26, 2012

Mr. Edwin Bakowski
Manager, Permit Section
Illinois Environmental Protection Agency
Division of Air Pollution Control
1021 North Grand Avenue East
Springfield, Illinois 62702

Via E-Mail and Regular Mail

RE: April 2012 Draft FESOP Comments
NACME Steel Processing, LLC
I.D. No. 031600FWL
Application No.05100052

Mr. Bakowski:

The following additional comments are being provided regarding the preliminary Draft Federally Enforceable State Operating Permit (FESOP) issued to the NACME Steel Processing, LLC (NACME) facility located at 429 West 127th Street in Chicago, Illinois (the facility) by IEPA letter dated April 26, 2012.

On June 15, 2012, I received email correspondence from Valeriy Brodsky, Permit Engineer for the Illinois Environmental Protection Agency (IEPA) responding to my June 14, 2012 draft FESOP comments letter. In the June 15, 2012 correspondence, Mr. Brodsky indicated that in 1988, the United States Environmental Protection Agency (US EPA) Region 5 made an Applicability Determination (AD) regarding the intent of 40 CFR 60, Subpart TT to regulate as applied volatile organic compounds (VOCs) and a determination of compliance with Subpart TT performance testing requirement on a coil coating operating at an Olin Corporation (Olin) facility.

Mr. Brodsky stated in his June 15, 2012 correspondence that subpart TT applies to NACME based on the 1988 US EPA AD. Specifically, Mr. Brodsky stated:

"Your main argument against NSPS Subpart TT applicability is the absence of curing and quenching stations in the NACME finish coat protective oil application operations. In 1988 the US EPA Region 5 made Applicability Determination on the performance testing for coil coating line which does not have a curing oven without questioning the NSPS Subpart TT applicability

888 Industrial Drive
Elmhurst, Illinois 60126
630-993-2100

(see attached). The Permit Section position is that the components listing of the affected facility being subject to emission standard does not relieve the whole facility from applicability on the ground of the absence of some components."

The issue with this position is that the purpose of the 1988 AD is being ignored and the fact is that it simply does not apply to NACME and the current situation.

The purpose of this correspondence is to provide our response to the June 15, 2012 IEPA Permit Section's comments and re-iterate the comments from the June 14, 2012 draft FESOP response letter including our comments for draft FESOP Condition Nos. 4b and 11c.

Response

As stated on the US EPA's Applicability Determination Index (ADI) web site, the general provisions of 40 CFR Parts 60 and 61 provide that a source owner or operator may request a determination from the US EPA of whether certain intended actions constitute the commencement of construction, reconstruction, or modification ("applicability determinations"); or seek permission to use monitoring or record keeping which is different from the promulgated NSPS and NESHAP standards ("alternative monitoring").

Review of the 1988 US EPA AD indicates that this AD appears to be taken out of context with regard to NACME operations. This AD addresses what VOCs are regulated under this Standard – VOCs as applied or VOCs as emitted in the context of determining whether the alternative performance testing completed by Olin Corporation is acceptable to the US EPA under the provisions of the NSPS (as outlined in the AD Abstract). The findings of the 1988 AD was that the alternative performance testing (e.g., monitoring) conducted by Olin did not comply with the NSPS.

The applicability of the NSPS to the Olin coating operation is not a part of this determination nor is it addressed in the AD. The AD discussion of the Olin coating station not having a flash off area or curing oven is used only in the context of determining where the emissions are occurring on the process line for the purposes of accurately measuring emissions during the completion of performance testing as required by the NSPS. The AD identifies only the coating station of the coating operation, does not identify other process line components that are in place after the coating station, and indicates that the performance testing was completed in a temporary enclosure on the coating applicator.

The AD further indicates that the enclosure used at the coating applicator during the stack test did not capture nor accurately measure all VOC emissions from the Olin coating operation since VOC emissions may have occurred after the temporary enclosure and, therefore, the performance testing completed on the process line did not meet the performance testing requirements of the NSPS.

Lastly, the AD indicates that all of the coating used on the Olin process line will evaporate as VOC emissions for the process being evaluated. In contrast, NACME roll oil is designed to remain on the metal coils for protection prior to final use, not to evaporate, which differs from the Olin coating operation.

As the AD abstract indicates, the purpose of the 1988 AD was not to determine whether the Olin coating operation is subject to the NSPS Subpart TT requirements but rather to determine at what point the VOCs are regulated and whether the performance testing completed meets the requirements of the NSPS. The US EPA omission of the NSPS applicability issue in this AD cannot, therefore, provide a definitive answer to the applicability of this NSPS to NACME operations since this AD simply did not address the coating line applicability issue.

As stated in our initial response regarding the applicability of the NSPS outlined in 40 CFR 60, Subpart TT, we continue to assert that the protective oil application process used at NACME's facility does not fall within the definition of coating operations as used in the Standard. Therefore, NACME is not subject to the NSPS; the Technical Support Documents (TSDs) provided in the June 14, 2012 draft FESOP response letter, which support this stance, more accurately address operations similar to the NACME protective coating application process.
With regard to specific permit conditions within the draft FESOP, the following is provided:

Permit Condition No. 2a

Condition 2a currently states that the Coil Coater at the facility is subject to NSPS for Metal Coil Surface Coating, 40 CFR 60, Subpart TT.

As previously stated, the Metal Coil Surface Coating NSPS does not apply to operations at the NACME facility because the oil application process does not meet the specific definition of prime or finish coat operations in the Standard.

As stated in 40 CFR 60.460(a), the Metal Coil Surface Coating NSPS applies only to the following coating operations:

- Each prime coat operation,
- Each finish coat operation, and
- Each prime and finish coat operation combined when the finish coat is applied wet on wet over the prime coat and both coatings are cured simultaneously.

As listed in 40 CFR 60.461, the following specific definitions apply to coil coating operations subject to the NSPS:

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

As indicated, NACME applies a protective rust preventative oil to metal coils which involves the use of an oil application station at the end of the steel pickling line. The protective oil is not dried or cured and does not contain any solids. Therefore, the protective oil is not subject to the VOM content limits for this Subpart. The protective oil remains on the coil after application and no quenching of the oiled metal coils is required (e.g., there is no quench station on this process line).

Furthermore, review of other current permits issued by the Indiana Department of Environmental Management (IDEM) for other protective or lubricating oil application processes and Technical Support Documents (TSDs) and guidance documents issued to states from the US EPA regarding what constitutes metal coil coating operations provide further evidence that the application of a rust preventative oil is not subject to this NSPS.

The following TDSs and guidance documents were previously provided in the June 14, 2012 response letter for air emission source permits issued by IDEM (which are available at the US EPA's Region 5 Division of Air and Radiation Indiana Permit Database) to facilities that perform rust preventative protective oil application processes onto metal coils:

- Ispat Inland, Inc. East Chicago, Indiana (Ispat) TSD for a Part 70 Source Construction Permit (Permit No. CP-089-10472-00316) – Ispat applies rust preventative oil to metal coils. The Federal Rule Applicability Section of the TSD (page 4 of 6) states that "*the application of rust preventative oils to the steel coils is not subject to the New Source Performance Standard 326 IAC 12 (40 CFR 60, Subpart TT) because this rule only applies to coating operations which use a curing oven and quench station as part of the process*".

- Syndicate Sales, Inc., Kokomo, Indiana (Syndicate) TSD for a FESOP Source (Permit No. F067-7699-00026) – Syndicate applies a petroleum lubricant to metal coils. The Federal Rule Applicability Section of the TSD (page 5 of 12) states that *"where only a single coating is applied to the metal coil, that coating is considered a finish coat. The definition of Finish Coat Operation is the coating application station, curing oven, and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping process only involves coating metal coil with petroleum lubricating oil to facilitate the shaping and cutting of the coil into metal stems in the stamping process. There are no curing ovens associated with the process. The metal stamping line does not fall under the definition of a finish coating operation, therefore, the requirements of 40 CFT 60.460, Subpart TT do not apply."*

- Kasle Metal Processing, Jeffersonville, Indiana (Kasle) TSD for a Construction Permit (Permit No. 019-22372-00119) – Kasle applies a rust preventative surface coating to steel blanks. The Federal Rule Applicability Section of the TSD (page 4 of 5) states that *"this source is not subject to the New Source Performance Standard, 326 IAC 12, 40 CFR 60.460, Subpart TT – Standards and Performance for Metal Coil Surface Coating Operations, which applies to prime coat, finish coat, and prime and finish coat combined operations because it is not a prime or finish coat operation".*

- The US EPA Guidance Document (Document No. EPA-453/P-00-001) *National Emissions Standards for Hazard Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards*, while it does not specifically address the NSPS requirements, outlines the "Metal Coil Coating Industry Profile and Process Description" (Section 3). Within this section of the US EPA Guidance Document, the USEPA describes the metal coil coating process as one that includes *"a wet station and*

one or more coating operations consisting of ***a coating application station, a curing oven, and a quench area".***

The Ispat TSD clearly states that the application of a rust preventative oil to a steel coil is not subject to the NSPS because the rule only applies to coating operations which use a curing oven and quench station as part of the process.

As indicated in Mr. Brodsky's response previous response to the original May 15, 2011 Draft FESOP response letter submitted to the IEPA, he indicated the roll oil falls under the definition of coating. As stated in the Syndicate TSD, an oil can be considered a coating and not be subject to the NSPS outlined in 40 CFR 60, Subpart TT.

The Kasle TDS specifically states that the application of a rust preventative coating is not a prime or finish coat operation.

The USEPA's own *National Emissions Standards for Hazard Air Pollutants: Metal Coil Surface Coating Industry Background Information for Proposed Standards* supports NACME's position as it clearly states that a metal coil surface coating operation consists of a wet station and one or more coating operations consisting of a coating application station, a curing oven, and a quench area. If US EPA believed that a rust preventative surface coating without a curing oven or a quench station – such as NACME's – fell within the definition of a metal surface coating operation and Subpart TT, then it would not have limited its guidance (or its definitions) to only those operations that include curing ovens and quenching stations. By doing so, the US EPA has clearly expressed its intention that Subpart TT ***not*** apply to a metal coating operation ***unless*** there is a curing oven or quench station involved. This conclusion is consistent not only with the definitions promulgated by US EPA itself in 40 CFR. 60.461, but also with the application of those definitions by IDEM to coating lines similar to NACME's here as detailed above.

Taken together, the TSDs, the US EPA guidance document, and the definitions in Subpart TT provide convincing evidence that the application of a rust preventative oil onto the metal coils does not meet the definition of finish or prime coat operations and, as a result, are not subject to the NSPS requirements of 40 CFR 60, Subpart TT.

Permit Condition No. 2b

Condition 2b states that, pursuant to 40 CFR 60.462(a)(1), each owner or operator subject to 40 CFR 60, Subpart TT shall not cause to be discharged into the atmosphere, more than 0.28 kilograms per liter of coating solids applied for each calendar month.

Based upon the information provided in the initial May 2012 draft FESOP response and the additional information provided in this correspondence, NACME requests revision of Condition 2a to state that the NSPS of 40 CFR 60, Subpart A and TT does not apply to metal coil protective oil application operations at the facility because the protective rust preventative oil application operation does not meet the definition of prime coat or finish coat operations as outlined in 40 CFR 60.461. As indicated above, 40 CFR 60, Subpart TT does not apply since the protective rust preventative oil application process do not meet the definition of either the prime coat or finish coating operations listed in 40 CFR 60.461 and the protective oil coating remains on the metal coils after application (e.g., is not cured or dried) and does not contain any solids.

Permit Condition No. 4b

Condition No. 4b indicates that no more than 8 pounds VOM per hour of organic material shall be discharged into the atmosphere from any emission unit.

Per our previous comment regarding this permit condition, NACME requests that additional language be inserted into Permit Condition 4b that states the coil oil application operation is not subject to the limitations of 35 IAC 218.301 pursuant to 35 IAC 218.209 which states:

- No owner or operator of a coating line subject to the limitations of Section 218.204 of this Part is required to meet the limitations of Subpart G (Section 218.301 or 218.302) of this Part, after the date by which the coating line is required to meet Section 218.204 of this Part

Permit Condition No. 11c

Condition 11c references monthly and annual limits on HAP emissions for both individual and combined HAP emissions. Additionally, this Condition also references the NESHAP for Surface Coating of Metal Coil (40 CFR 63, Subpart SSSS).

Per our previous comments, while the language in the Condition referencing the non-applicability of the NESHAP for Steel Pickling Operations in 40 CFR 63, CCC is accurate, there is no regulation that limits monthly or annual, individual or combined HAP emissions other than maintaining these HAP emission levels below the major source levels of 10 tons per year of individual HAPs and 25 tons per year combined HAPs.

Therefore, in addition to the removal of the reference to the Surface Coating of Metal Coils that the IEPA has already agreed to, NACME requests that the monthly and annual emission limitations outlined in the current draft FESOP be removed. Note, however, NACME understands the importance of minimizing the emissions of HAPs and would accept to have this Condition revised to limit individual HAP emissions to 9.0 tons per year and combined HAP emissions to 22.5 tons per year (below major source threshold levels) with no monthly limitations.

Permit Condition No. 13a and b/Permit Condition No. 14a and b

As indicated in the comments regarding Permit Condition Nos. 2a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME request that Permit Condition Nos. 13a and b and 14a and b be removed from the FESOP.

Permit Condition No. 18/Permit Condition No. 19a and b/Permit Condition No. 20/Permit Condition No 25

As indicated in the comments regarding Permit Condition Nos. 2a and b, 13a and b, and 14a and b, the protective oil application operation at the facility does not meet the definition of prime coat or finish coat operations and the Metal Coil Surface Coating NSPS does not apply. NACME request that Permit Condition Nos. 18, 19a and b, 20 and 25 be removed from the FESOP.

If you have any questions or require further information, please contact our consultant, Britt Wenzel of Mostardi Platt at 630-993-2123.

Respectfully Submitted,

Britt Wenzel
Director, Environmental, Health & Safety Compliance Services

cc: J. DuBrock, National Processing Company
David Susler, National Material L.P.
Ms. Nancy Tikalsky, IAG

EXHIBIT G

Walsh III, Edward V.

From: Brodsky, Valeriy [Valeriy.Brodsky@Illinois.gov]
Sent: Wednesday, June 27, 2012 2:41 PM
To: BWenzel@mp-mail.com
Cc: dsusler@nmlp.com; Walsh III, Edward V.; jdubrock@nmlp.com; O'Meara, Robert S.; Bernoteit, Bob
Subject: RE: NACME (I.D. No. 031600FWL) Comments to Draft FESOP

Mr. Wenzel,

The Illinois EPA position on NSPS Subpart TT applicability is guided by the memo received from US EPA and cited in the previous communication. In spite of the fact that the subject of requested determination was testing procedure, it is very doubtful that US EPA would make procedural determination for non-subject source. The Illinois EPA continues to consider NACME protective oil application operations as being subject to NSPS Subpart TT requirements.

Sincerely,

Valeriy Brodsky
Environmental Protection Engineer
Illinois EPA, Bureau of Air

Telephone: 217/785-1738
Fax: 217/524-5023
e-mail: Valeriy.Brodsky@illinois.gov

From: BWenzel@mp-mail.com [mailto:BWenzel@mp-mail.com]
Sent: Wednesday, June 27, 2012 10:12 AM
To: Brodsky, Valeriy
Cc: dsusler@nmlp.com; EWalsh@ReedSmith.com; jdubrock@nmlp.com; ROMeara@ReedSmith.com
Subject: RE: NACME (I.D. No. 031600FWL) Comments to Draft FESOP

Mr. Brodsky:

Attached please find the response to your June 15, 2012 email regarding the Draft FESOP issued to the NACME Steel Processing, LLC facility (I.D. No. 031600FWL). Please review and contact me with any questions or additional comments. The original letter has been sent in the mail.

(See attached file: NACME Draft FESOP Response Letter 3_0626 FINAL.pdf)

mostardi platt
Britt E. Wenzel
bwenzel@mp-mail.com
t: 630-993-2123 *m:* 630-688-1799 *f:* 630-993-9017
888 Industrial Drive Elmhurst IL 60126
www.mostardi-platt.com

EXHIBIT H

See p. 5 of 12 on TSD

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT

Syndicate Sales, Inc.
2025 North Wabash Street
Kokomo, Indiana 46901-2063

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F067-7699-00026	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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)]

The Permittee owns and operates a stationary plastic container/pot and metal floral stem manufacturing operation.

Responsible Official:	Paul E. Manning
Source Address:	2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address:	P.O. Box 756, Kokomo, Indiana 46903-0756
SIC Code:	3089, 3469
County Location:	Howard
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

(1) one (1) flow coating line consisting of:
- (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
- (b) one (1) UV exposure room;
- (c) two (2) vacuum metallizers;
- (d) one (1) aqueous dye dip tank;
- (e) two (2) rinse tanks; and
- (f) one (1) electric drying oven.

(2) one (1) metal stamping press line consisting of:
- (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
- (b) one (1) packaging operation.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

(1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
(2) propane or liquefied petroleum gas, or butane-fired combustion sources with heat input less than six million (6,000,000) Btu per hour;
(3) combustion source flame safety purging on startup;
(4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
(5) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
(6) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
(7) machining where an aqueous cutting coolant continuously floods the machining interface;
(8) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
(9) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or

0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(10) exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;

(11) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;

(12) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;

(13) forced and induced draft cooling tower system not regulated under a NESHAP;

(14) paved and unpaved roads and parking lots with public access;

(15) enclosed systems for conveying plastic raw materials and plastic finished goods;

(16) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source;

(17) equipment used to collect released material;

(18) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;

(19) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;

(20) a laboratory as defined in 326 IAC 2-7-1(20)(C);

(21) a plastic molding operation, including five (5) plastic pellet storage silos and eighteen (18) plastic molding machines;

(22) a hot stamping operation, including five (5) hot stamp machines;

(23) a floral paper operation, including a waxer and a sheeter; and

(24) a stemming machine production line, including machining operations and a paint spray booth.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

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, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

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

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

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.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

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

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, 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.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year 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

and

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

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

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

(1) The 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:

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

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

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

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

(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, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes 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, OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

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

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 2-8-4(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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(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) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) 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.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

(b) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent.

(c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP 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 2-8-4(5)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM 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 2-8-8(a)]

(c) Proceedings by IDEM, OAM, 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 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. 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).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

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

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

(B) 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. [326 IAC 2-5-3]

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
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 2-8 until IDEM, OAM 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 in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Administrative Permit Amendment [326 IAC 2-8-10]

(a) An administrative permit amendment is a FESOP revision that makes changes of the type specified under 326 IAC 2-8-10(a).

(b) An administrative permit amendment may be made by IDEM, OAM, consistent with the procedures specified under 326 IAC 2-8-10(b).

(c) The Permittee may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Minor Permit Modification [326 IAC 2-8-11(a)] [326 IAC 2-8-11(b)(1) and (2)]

(a) A permit modification is any revision to this permit that cannot be accomplished as an administrative permit amendment under 326 IAC 2-8-10.

(b) Minor modification of this permit shall follow the procedures specified under 326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).

(c) An application requesting the use of minor modification procedures shall meet the requirements of 326 IAC 2-8-3(c) and shall include the information required in 326 IAC 2-8-11(b)(3)(A) through (D).

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application provided that the change has received any approval required by 326 IAC 2-1. After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

B.20 Significant Permit Modification [326 IAC 2-8-11(d)]

(a) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative

amendments.

(b) Any significant change in existing monitoring permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions of this permit shall be considered significant.

(c) Nothing in 326 IAC 2-8-11(d) shall be construed to preclude the Permittee from making changes consistent with 326 IAC 2-8 that would render existing permit compliance terms and conditions irrelevant.

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, review by affected states, and review by U.S. EPA, as they apply to permit issuance and renewal.

B.21 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.23 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without 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 approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in 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 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAM 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.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.25 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

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

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

B.26 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10.

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

B.28 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) Emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20).

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 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. 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]

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]

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 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is 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]

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 must be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), 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 [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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 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.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.10 Monitoring Methods [326 IAC 3]

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

C.11 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 Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared

within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM

may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(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 [326 IAC 2-8-4(3)(B)]

(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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(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 2-8-4(3)(C)]

(a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly 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 quarterly 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

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 OPERATION CONDITIONS

(1)	one (1) flow coating line consisting of:
	(a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
	(b) one (1) UV exposure room;
	(c) two (2) vacuum metallizers;
	(d) one (1) aqueous dye dip tank;
	(e) two (2) rinse tanks; and
	(f) one (1) electric drying oven.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 2-8-4] [326 IAC 8-1-6] [326 IAC 2-2]

(a) Pursuant to 326 IAC 2-8 and 326 IAC 8-1-6, the total volatile organic compound (VOC) usage in the flow coater shall not exceed 65.8 tons per twelve (12) consecutive months.

(b) The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months.

(c) During the first twelve months of operation under this permit, the usage of VOC in the flow coater shall be limited such that the total tons divided by the accumulated months of operation shall not exceed 5.5 tons per month.

(d) Therefore, the requirements of 326 IAC 2-7 do not apply. This limitation will also render the requirements of 326 IAC 2-2 (PSD) not applicable.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-3(c)(6)]

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

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

D.1.4 Work Practices [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, the following work practices shall be implemented for the flow coater:

(1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;

(2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition 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.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.6 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken 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 and 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 month;

(4) The cleanup solvent usage for each month;

(5) The total VOC usage for each month; and

(6) The weight of VOCs emitted for each compliance period.

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

D.1.7 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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.

SECTION D.2 FACILITY OPERATION CONDITIONS

(2)	one (1) metal stamping press line consisting of:
	(a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
	(b) one (1) packaging operation.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8] [326 IAC 2-2]

Potential VOC emissions from the metal stamping press line are less than 25 tons per year, therefore, this facility is not subject to any of the VOC rules under 326 IAC Article 8 and the requirements of 326 IAC 2-2 (PSD) do not apply. Any change or modification which may increase potential emissions to 25 tons per year from the metal stamping press line shall subject the equipment to the requirements of 326 IAC 8-2-4.

Compliance Determination Requirements

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.3 Record Keeping Requirements

(a) Pursuant to 326 IAC 2-1-3(i)(8), records of surface coating quantities and organic solvent contents shall be maintained for a minimum period of 36 months and made available upon request of the Office of Air Management (OAM).

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

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026

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
- Emergency/Deviation Occurrence Reporting Form
- Test Result (specify) _____
- Report (specify) _____
- Notification (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:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026

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

Check either No. 1 or No.2
• 1. This is an emergency as defined in 326 IAC 2-7-1(12) •The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and •The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
• 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) •The Permittee must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
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: _____

Attach a signed certification to complete this report.

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

FESOP Quarterly Report

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026
Facility: Flow Coater (ID No. 1)
Parameter: Volatile Organic Compound (VOC) usage
Limit: The total volatile organic compound (VOC) usage in the flow coater shall not exceed 65.8 tons per twelve (12) consecutive months. The total for each month shall not exceed the difference between the annual usage limit minus the sum of actual usage from the previous eleven (11) months. During the first twelve months of operation under this permit, the usage of VOC in the flow coater shall be limited such that the total tons divided by the accumulated months of operation shall not exceed 5.5 tons per month.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	12 Month Total VOC Usage
Month 1			
Month 2			
Month 3			

- 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 MANAGEMENT
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE REPORT

Source Name: Syndicate Sales, Inc.
Source Address: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
Mailing Address: P.O. Box 756, Kokomo, Indiana 46903-0756
FESOP No.: F067-7699-00026

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

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviations**	**No Deviations**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background And Description

Source Name:	**Syndicate Sales, Inc.**
Source Location:	**2025 North Wabash Street**
	Kokomo, Indiana 46901-2063
County:	**Howard**
SIC Code:	**3089, 3469**
Operation Permit No.:	**F067-7699-00026**
Permit Reviewer:	**Trish Earls/EVP**

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit (FESOP) application from Syndicate Sales, Inc. relating to the operation of a stationary plastic container/pot and metal floral stem manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

The source also consists of the following unpermitted facilities/units:

(1) one (1) flow coating line consisting of:
- (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
- (b) one (1) UV exposure room;
- (c) two (2) vacuum metallizers;
- (d) one (1) aqueous dye dip tank;
- (e) two (2) rinse tanks; and
- (f) one (1) electric drying oven.

(2) one (1) metal stamping press line consisting of:
- (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
- (b) one (1) packaging operation.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

(1) natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units (Btu) per hour;
(2) propane or liquefied petroleum gas, or butane-fired combustion sources with heat input less than six million (6,000,000) Btu per hour;
(3) combustion source flame safety purging on startup;
(4) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;
(5) vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids;
(6) application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings;
(7) machining where an aqueous cutting coolant continuously floods the machining interface;
(8) degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
(9) cleaners and solvents having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;
(10) exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
(11) any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs;
(12) water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs;
(13) forced and induced draft cooling tower system not regulated under a NESHAP;
(14) paved and unpaved roads and parking lots with public access;
(15) enclosed systems for conveying plastic raw materials and plastic finished goods;
(16) purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source;
(17) equipment used to collect released material;
(18) blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower;
(19) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute;
(20) a laboratory as defined in 326 IAC 2-7-1(20)(C);
(21) a plastic molding operation, including five (5) plastic pellet storage silos and eighteen (18) plastic molding machines;
(22) a hot stamping operation, including five (5) hot stamp machines;
(23) a floral paper operation, including a waxer and a sheeter; and
(24) a stemming machine production line, including machining operations and a paint spray booth.

Enforcement Issue

(a) IDEM is aware that the following equipment has been constructed and operated prior to

receipt of the proper permit:

(1) one (1) flow coating line consisting of:
  (a) one (1) flow coater (Emission Unit ID No. 1) coating a maximum of 0.0818 plastic pots per hour, exhausting at one (1) stack (ID No. Vent 1);
  (b) one (1) UV exposure room;
  (c) two (2) vacuum metallizers;
  (d) one (1) aqueous dye dip tank;
  (e) two (2) rinse tanks; and
  (f) one (1) electric drying oven.

(2) one (1) metal stamping press line consisting of:
  (a) three (3) metal stamping presses (Emission Unit ID Nos. 2, 3, and 4) coating a maximum of 0.1033 metal floral stems per hour; and
  (b) one (1) packaging operation.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit will also satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on December 13, 1996. Additional information was received on September 26, 1997.

Emissions Calculations

See Appendix A: Emissions Calculations for detailed calculations (2 pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	225.7
CO	0.0

NO_x	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential Emissions (tons/year)
TOTAL	0.0

See attached spreadsheets for detailed calculations (2 pages).

(a) The potential emissions (as defined in the Indiana Rule) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter emissions are not counted toward determination of PSD and Emission Offset applicability.

Limited Potential To Emit

(a) To simplify recordkeeping and to accommodate unpredictable variations in production, the source has accepted federally enforceable production limitations that limit potential to emit VOC to 91 tons per 12 consecutive month period. This limit was established at 11/12 ths of 99 tons per year to eliminate the effect that daily variations would have on any 365 day period. This limit consists of:

(i) 90.56 tons per year for the significant activities; and

(ii) 0.44 tons per year for the insignificant activities.

(b) The table below summarizes the total limited potential to emit of the significant and insignificant emission units.

	Limited Potential to Emit (tons/year)						
Process/ facility	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
Flow Coater	0.0	0.0	0.0	65.76	0.0	0.0	0.0
Metal Stamping Presses	0.0	0.0	0.0	24.80	0.0	0.0	0.0
Insignificant Activities	0.0	0.0	0.0	0.44	0.0	0.0	0.0

Total Emissions	0.0	0.0	0.0	91.00	0.0	0.0	0.0

Attached Table A summarizes the permit conditions and requirements.

County Attainment Status

The source is located in Howard County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Howard County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The metal stamping press line is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.460, Subpart TT), "Standards of Performance for Metal Coil Surface Coating". This rule applies to each prime coat operation, each finish coat operation, and each prime and finish coat operation combined, when the finish coat is applied wet over the prime coat, and both coatings are cured simultaneously. Where only a single coating is applied to the metal coil, that coating is considered a finish coat. The definition of a finish coat operation is the coating application station, curing oven, and quench station used to apply and dry or cure the final coating on the surface of the metal coil. The metal stamping press line only involves coating the metal coil with a petroleum lubricating oil to facilitate the shaping and cutting of the coil into floral stems in the stamping presses. There are no curing ovens or quench stations associated with this process. The metal stamping press line does not fall under the definition of a finish coat operation, therefore, the requirements of 40 CFR 60.460, Subpart TT do not apply.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting), which would require the source to submit an annual emission statement. Pursuant to this rule, any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or

processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is enforceable. This source has accepted federally enforceable operation conditions which limit emissions of volatile organic compounds (VOC) to below 100 tons per year. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, source wide VOC emissions must be limited to no more than 99 tons per year. The source has accepted a VOC usage limitation for the Flow Coater (ID No. 1) of 65.76 tons per 12 consecutive month period. By accepting this VOC usage limitation for the Flow Coater (ID No. 1), source wide VOC emissions are limited to 91.0 tons per 12 consecutive month period, thus the source satisfies the requirements of 326 IAC 2-8-4 and the requirements of 326 IAC 2-7 do not apply. These limitations will also render 326 IAC 2-2 not applicable.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The flow coater is subject to the provisions of 326 IAC 8-1-6. This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). Potential VOC emissions from the flow coater are 200.44 tons per year. Since the potential VOC emissions are greater than 25 tons per year, the requirements of 326 IAC 8-1-6 apply to the flow coater.

Syndicate Sales, Inc. has submitted a BACT analysis, dated February 19, 1996, as part of this FESOP application.

The options considered in the BACT analysis for the flow coater are:

(1) Recuperative Thermal Incineration
(2) Regenerative Thermal Incineration
(3) Recuperative Catalytic Incineration
(4) Regenerative Catalytic Incineration
(5) Flare
(6) Other Innovative Destruction Technologies

(7) Carbon Adsorption
(8) Absorption
(9) Condensation
(10) Carbon Adsorption with Recuperative Thermal Incineration
(11) Absorption and Incineration

It was determined that options 6, 10 and 11 are technically infeasible due to the following reasons:

(6) None of the innovative destruction technologies such as biofilters or systems applying ultraviolet radiation seem well documented, in particular, process cost information is lacking. These options were not considered to be commercially available.

(10) The combination of carbon adsorption with thermal oxidation is not a suitable VOC control technology for the flow coater because the inlet VOC concentration is too high. The VOC concentration in the desorb stream would exceed 25% of the LEL, making the concentrated stream unsuitable for thermal oxidation.

(11) Absorption concentrators are typically suited for batch processes or to equalize pollutant concentrations in a variable stream. The physical characteristics that drive the absorption of pollutants into a liquid also limit the opportunity to remove these pollutants from the liquid stream. Because the combination of absorption with incineration has only limited application, it was not considered feasible.

The technically feasible options are recuperative thermal incineration, regenerative thermal incineration, recuperative catalytic incineration, regenerative catalytic incineration, a flare, carbon adsorption, absorption, and condensation. A cost analysis was performed to determine the economic feasibility of these control options for the flow coater VOC emissions. The cost analysis is based on a federally enforceable limited VOC throughput of 65.76 tons per year for the flow coater.

The tables below show the results of the cost analysis.

(A) Capital Cost

Option	Base Price	Direct Cost	Indirect Cost	Total
Recuperative Thermal Incineration	(1)	(1)	(1)	296,596
Regenerative Thermal Incineration	(1)	(1)	(1)	509,598
Recuperative Catalytic Incineration	(1)	(1)	(1)	218,923
Regenerative Catalytic Incineration	(1)	(1)	(1)	171,417
Absorption	(1)	(1)	(1)	2,592,442
Carbon Adsorption	(1)	(1)	(1)	124,275
Condensation	(1)	(1)	(1)	281,923

Flare	(1)	(1)	(1)	167,082

(1) Total Capital Cost includes Base Price, Direct Cost and Indirect Cost.

(B) Annual Operating, Maintenance & Recovery Cost

Option	Direct Cost	Indirect Cost	Capital Recovery Cost	Total
Recuperative Thermal Incineration	12,814	16,033	48,270	77,117
Regenerative Thermal Incineration	9,180	24,553	82,935	116,668
Recuperative Catalytic Incineration	15,097	12,926	33,994	62,017
Regenerative Catalytic Incineration	15,404	11,026	26,263	52,693
Absorption	13,255	107,867	421,908	543,030
Carbon Adsorption	198,222	9,140	19,270	226,632
Condensation	136,899	15,446	45,882	198,227
Flare	427,617	10,853	21,967	460,436

(C) Evaluation

Option	Limited Potential Emissions (tons/yr)	Emissions Removed (tons/yr)	Control Efficiency (%)	$/ton Removed
Recuperative Thermal Incineration	65.76	62.47	95	1,234
Regenerative Thermal Incineration	65.76	62.47	95	1,868

Recuperative Catalytic Incineration	65.76	62.47	95	993
Regenerative Catalytic Incineration	65.76	62.47	95	843
Absorption	65.76	64.44	98	8,427
Carbon Adsorption	65.76	62.47	95	3,628
Condensation	65.76	46.03	70	4,306
Flare	65.76	64.44	98	7,145

Methodology:
Emissions removed = (limited potential emissions from warehouse) * (control efficiency)
$/ton removed = total annual cost / emissions removed

The cost breakdown is as follows:

1. Capital Cost
   a) Base price: purchase price, auxiliary equipment, instruments, controls, taxes and freight.
   b) Direct installation cost: foundations/supports, erection/handling, electrical, piping, insulation, painting, site preparation and building/facility.
   c) Indirect installation cost: engineering, supervision, construction/filed expenses, construction fee, start up, performance test, model study and contingencies.

2. Annual Cost
   a) Direct operating cost: operating labor (operator, supervisor), labor and material maintenance, operating materials, utilities (electricity, gas).
   b) Indirect operating cost: overhead, property tax, insurance, administration and capital recovery cost (for 10 years life of the system at 10% interest rate).

From the cost analysis, six technology options appear to offer cost effectiveness less than $5,000 per ton. Absorption and flare options are not cost effective. Carbon adsorption and condensation have marginal cost effectiveness, however, thermal destruction methods offer such greater cost effectiveness than the reclamation options that only the destruction methods were considered further. The annual cost of the destruction methods were compared to Syndicate Sales, Inc.'s average net profit before taxes for 1992 through 1995. The results expressed the total annual cost of the control options as a percentage of the average net profits before taxes for 1992 through 1995. The table below summarizes these results.

Control Option	Capital Cost	% of Net Profit	Annual Cost	% of Net Profit
Recuperative Thermal Incineration	296,596	514	77,117	133
Regenerative Thermal Incineration	509,598	882	116,668	202

Recuperative Catalytic Incineration	218,923	379	62,017	107
Regenerative Catalytic Incineration	171,417	297	52,693	91

Based on this information, none of these control options are economically feasible. Because all options are either technically infeasible or economically infeasible, no VOC emission control has been determined to be BACT. Also, because the BACT analysis was based on an enforceable limited VOC throughput of 65.76 tons per year for the flow coater, this throughput limitation is part of the BACT determination. Thus, in summary, BACT for the flow coater has been determined to be a limited VOC throughput of 65.76 tons per year, no add-on controls, and the following work practices:

(1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;

(2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

The metal stamping press line is not subject to the requirements of 326 IAC 8-1-6 since potential VOC emissions from the three (3) stamping presses (ID Nos. 2, 3, and 4), constructed in 1982, are less than 25 tons per year.

326 IAC 8-2-4 (Coil Coating Operations)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-4 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

The three (3) metal stamping presses (ID Nos. 2, 3, and 4) are not subject to the provisions of 326 IAC 8-2-9 since the presses were constructed in 1982, are located in Howard County, and potential VOC emissions are less than 25 tons per year.

There are no other 326 IAC 8 rules that apply.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds

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

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

The flow coater (ID No. 1) has applicable compliance monitoring conditions as specified below:

(a) Total VOC usage in the flow coater shall be limited to 65.8 tons per twelve (12) consecutive month period, rolled on a monthly basis.

(b) Quarterly reports shall be submitted to OAM Compliance Section. These reports shall include annual VOC usage, rolled on a monthly basis.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-8 (FESOP) and 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

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) FESOP Application Form GSD-08.

None of these listed air toxics will be emitted from this source.

Conclusion

The operation of this plastic container and metal floral stem manufacturing operation will be subject to the conditions of the attached proposed **FESOP No. F067-7699-00026.**

Table A

Stack/Vent ID: Vent 1				
Stack/Vent Dimensions:	**Ht: 35'**	**Dia: 16"**	**Temp: 77°F**	**Flow: 1,980 acfm**
Emission Unit: Flow Coater				
Date of Construction: 7/83				
Alternative Scenario: N/A				
Pollution Control Equipment: N/A				
General Description of Requirement:	VOC usage limitation			
Numerical Emission Limit:	65.8 tons/yr			
Regulation/Citation:	326 IAC 2-8 and 326 IAC 8-1-6			
Compliance Demonstration:	Record keeping and Reporting			
PERFORMANCE TESTING	N/A			
Parameter/Pollutant to be Tested:				
Testing Method/Analysis:				
Testing Frequency/Schedule:				
Submittal of Test Results:				
COMPLIANCE MONITORING				
Monitoring Description:	record keeping and reporting			
Monitoring Method:				
Monitoring Regulation/Citation:				
Monitoring Frequency:	monthly			
RECORD KEEPING				
Parameter/Pollutant to be Recorded:	VOC usage per month			
Recording Frequency:	monthly			
Submittal Schedule of Reports:	quarterly			
REPORTING REQUIREMENTS				
Information in Report:	VOC usage per month			
Reporting Frequency/Submittal:	quarterly			
Additional Comments:				

Appendix A: Emission Calculations
VOC and Particulate
Surface Coating Operations

Company Name: Syndicate Sales, Inc.
Address, City, IN Zip: 2026 North Wabash Street, Kokomo, Indiana 46901-2063
FESOP: F067-7699
Pit ID: 067-00026
Reviewer: Trish Earls
Date: September 26, 1997

Potential Uncontrolled Emissions:

Material (as applied)	Process	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	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 pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons/yr	lb VOC per gal solids	Transfer Efficiency
Valspar UV Cure Lacquer	FC-1	6.85	95.30%	0.00%	95.30%	0.00%	5.51%	85.7	0.0818	6.53	6.53	45.76	1098.32	200.44	0.00	118.48	100.00%
Stamping Oil No. 7	Press 1	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1033	5.82	5.82	1.59	38.11	6.96	0.00	64.70	100.00%
Stamping Oil No. 7	Press 2	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1168	5.82	5.82	1.80	43.09	7.86	0.00	64.70	100.00%
Stamping Oil No. 7	Press 3	6.47	90.00%	0.00%	90.00%	0.00%	9.00%	2.64	0.1462	5.82	5.82	2.26	54.68	9.98	0.00	64.70	100.00%
Total State Potential Emissions:												51.43	1234.20	225.24	0.00		

Potential Controlled Emissions:

	FC-1 Material Usage Limitation	Controlled VOC pounds per hour	Controlled VOC pounds per day	Controlled VOC tons per year	Controlled PM tons/yr
Total Federal Potential Emissions:	32.81%	20.68	496.24	90.56	0.00

Note:
At a 32.81% material usage limitation, VOC emissions from the Flow Coater are limited to 65.76 tons/yr for a source wide VOC limit of 91 tons per year (99 x 11/12), therefore, the requirements of 326 IAC 2-7 do not apply.
Potential emissions from the three stamping presses are less than 25 tons per year, therefore, the requirements of 326 IAC 8-1-6 do not apply.

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 hrs/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit * Maximum (units/hr) * (8760 hrs/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = Maximum (units/hr) * Gal of Material (gal/unit) * Density (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer Eff.) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Transfer Efficiency
Limited VOC Tons per Year = Potential VOC Tons per Year * Material Usage Limitation (%)

Appendix A: Emission Calculations

Company Name: Syndicate Sales, Inc.
Address City IN Zip: 2025 North Wabash Street, Kokomo, Indiana 46901-2063
FESOP: F067-7699
Plt ID: 067-00026
Reviewer: Trish Earls
Date: September 26, 1997

Total Potential To Emit (tons/year)

	Emissions Generating Activity			
Pollutant	Flow Coater	Metal Stamping Presses	Insignificant Activities*	**TOTAL**
PM **	0.00	0.00	0.00	0.00
PM10	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	200.44	24.80	0.44	225.68
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from paint spray booth in stemming machine production line.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Limited Potential To Emit (tons/year)

	Emissions Generating Activity			
Pollutant	Flow Coater	Metal Stamping Presses	Insignificant Activities*	**TOTAL**
PM **	0.00	0.00	0.00	0.00
PM10	0.00	0.00	0.00	0.00
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC***	65.76	24.80	0.44	91.00
CO	0.00	0.00	0.00	0.00
total HAPs	0.00	0.00	0.00	0.00
worst case single HAP	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year.
*Insignificant Activity Emissions represent emissions from paint spray booth in stemming machine production line.
**For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration
***By accepting a 32.81% usage limitation for the Flow Coater, source wide VOC emissions are limited to 91 tons/yr, therefore, 326 IAC 2-7 does not apply.

Indiana Department of Environmental Management
Office of Air Management

Addendum to the Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

Source Name:	**Syndicate Sales, Inc.**
Source Location:	**2025 North Wabash Street**
	Kokomo, Indiana 46901-2063
SIC Code:	**3089, 3469**
County:	**Howard**
Operation Permit No.:	**F067-7699-00026**
Permit Reviewer:	**Trish Earls/EVP**

On November 21, 1997, the Office of Air Management (OAM) had a notice published in The Kokomo Tribune, Kokomo, Indiana, stating that Syndicate Sales, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) to operate a plastic container/pot and metal floral stem manufacturing operation. The notice also stated that OAM proposed to issue a FESOP for this operation and provided information on how the public could review the proposed FESOP 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 FESOP should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the FESOP:

1. Condition B.1 of the FESOP has been changed from:

B.1 General Requirements [IC 13-15] [IC 13-17]

The Permittee shall comply with the provisions of IC 13-15 (Permits Generally), IC 13-17 (Air Pollution Control) and the rules promulgated thereunder.

and replaced with a new condition which reads as follows (changes in bold for emphasis):

B.1 **Permit No Defense [326 IAC 2-1-10] [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

2. Condition B.6 of the FESOP has been revised from:

B.6 Severability [326 IAC 2-8-4(4)] [326 IAC 2-8-7(a)(3)]

(a) The provisions of this permit are severable, and if any provisions of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

(b) Indiana rules from 326 IAC quoted in conditions in this permit are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

to read as follows (changes in bold for emphasis):

B.6 Severability [326 IAC 2-8-4(4)]

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.**

3. Subsection (c) of Condition B.8 of the FESOP has been revised from:

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records directly to the U.S. EPA and IDEM, OAM, along with a claim of confidentiality.

to read as follows (changes in bold):

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. For information claimed to be confidential, the Permittee shall furnish such records **to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, the Permittee shall furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

4. Condition B.11 of the FESOP was revised from:

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) This certification shall be submitted on the attached Certification Form.

(c) A responsible official is defined at 326 IAC 2-7-1(33).

such that an additional rule cite was added to the title, subsection (b) was revised, and the rule cite in subsection (c) was changed. The Condition now reads as follows (changes in bold):

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] **[326 IAC 2-8-5(1)]**

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) **One (1) certification shall be included, on the attached Certification Form, with each submittal.**

(c) A responsible official is defined at **326 IAC 2-7-1(34).**

5. Subsections (a) and (b) of Condition B.12 of the FESOP have been revised and subsection (d) has been deleted. Condition B.12 now reads as follows (changes in bold and deletions in strike out):

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year 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

and

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

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

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

(1) The 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 compliance of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d) The Permittee shall also annually certify that this source is in compliance with additional requirements as may be specified under Sections 114(a)(3) and 504(b) of the Clean Air Act.~~

6. Condition B.13 has been revised to read as follows (changes in bold and deletions in strikeout):

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) **If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each:**

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

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

~~(3) Corrective actions that will be implemented in the event an inspection indicates an out-of-specification situation;~~

~~(4) A time schedule for taking such corrective actions including a schedule for devising additional corrective actions for situations that may not have been predicted; and~~

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

(b) **The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.**

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

7. Subsection (b)(4) of Condition B.14 of the FESOP has been revised as follows (strike out indicates portion that has been deleted):

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM,

OAM, 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 No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

~~Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]~~

8. Condition B.15 has been revised to read as follows (changes in bold):

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any **response steps** or preventive measures taken shall be reported to:

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

within ten (10) calendar days from the date of the discovery of the deviation.

(b) Written notification shall be submitted on the attached **Emergency**/Deviation Occurrence Reporting Form or its substantial equivalent.

(c) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

9. Subsection (a) and subsection (b)(1) of Condition B.17 of the FESOP have been revised as follows (changes in bold or strikeout):

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. 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**).

Request for renewal shall be submitted to:

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

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) ~~The Permittee has a duty to submit a timely and complete permit renewal application.~~ A timely renewal application is one that is:

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

(B) **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. [326 IAC 2-5-3]**

10. Subsections (b) and (d) of Condition B.19 of the FESOP have been revised as follows (changes in bold):

(b) Minor modification of this permit shall follow the procedures specified under **326 IAC 2-7-12(b), except as provided by 326 IAC 2-8-11(c).**

(d) The Permittee may make the change proposed in its minor permit modification application immediately after it files such application **provided that the change has received any approval required by 326 IAC 2-1.** After the Permittee makes the change allowed under minor permit modification procedures, and until IDEM, OAM takes any of the actions specified in 326 IAC 2-8-11(b)(5), the Permittee must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this period, the Permittee need not comply with the existing permit terms and conditions it seeks to modify. If the Permittee fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it. [326 IAC 2-8-11(b)(6)]

11. Subsection (d) of Condition B.20 of the FESOP has been revised as follows (changes in bold):

(d) Significant modifications of this permit shall meet all requirements of 326 IAC 2-8, including those for application, public participation, **review by affected states**, and review by U.S. EPA, as they apply to permit issuance and renewal.

12. Condition B.22 of the FESOP has been revised as follows (changes in bold):

B.22 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes **(this term is defined at 326 IAC 2-7-1(36))** without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

13. Subsection (b) of Condition B.23 of the FESOP has been revised as follows (changes in bold):

(b) 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 by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(**34**).

14. Condition B.24 of the FESOP has been revised as follows (changes in bold):

B.24 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be **approved** as required by and in accordance with 326 IAC 2.

15. Subsection (b) of Condition B.26 of the FESOP has been revised as follows (changes in bold):

(b) The written notification shall be sufficient to transfer the permit to the new owner **by an administrative amendment pursuant to 326 IAC 2-8-10.**

16. Condition B.27 of the FESOP has been revised to read as follows (changes in bold or strikeout):

B.27 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAM, **within thirty (30) calendar days of receipt of a billing, or in a time period** consistent with the fee schedule established in 326 IAC 2-8-16.

(b) Failure to pay may result in administrative enforcement action **or** revocation of this permit. ~~referral to the Office of Attorney General for collection, or other appropriate measures.~~

~~(c) The Permittee shall pay the annual fee within thirty (30) calendar days of receipt of a billing by IDEM, OAM or in a time period that is consistent with the payment schedule issued by IDEM, OAM.~~

(c) If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, the Permittee shall call the following telephone numbers: 1-800-451-6027 or 317-233-**0425** (ask for OAM, **Technical Support and Modeling Section**), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.

17. Conditions C.1, C.3, C.5, and C.6 of the FESOP have been revised to read as follows (changes in bold or strikeout):

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.

(b) Emissions of particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per three hundred sixty-five (365) consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) will not apply.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(20). ~~The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.~~

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

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

C.5 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.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit shall be operated at all times that the emission unit vented to the control equipment is in operation, as described in Section D of this permit.

18. Conditions C.8 through C.17 of the FESOP have been revised to read as follows (changes in bold or strikeout):

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-2.1 (Source Sampling Procedures), **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. ~~[326 IAC 3-2.1-2(a)]~~

(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.

C.9 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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 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.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(**34**).

C.10 Monitoring Methods [326 IAC 3]

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

C.11 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.**

C.12 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, **subject to 40 CFR 68**, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-8-5(a)(1), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

C.13 Compliance Monitoring Plan - Failure to Take Corrective Action [326 IAC 2-8-4(3)]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate **response steps** ~~as described in the Preventive Maintenance Plan~~ shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the **response steps within the time prescribed in the Compliance Response Plan**, shall constitute a violation of the permit unless taking the **response steps** set forth in the **Compliance Response Plan** would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further **response steps** for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further **response steps** providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the **compliance monitoring** parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) **The process has already returned to operating within "normal" parameters and no response steps are required.**

(d) Records shall be kept of all instances in which the **compliance related information was** not met and of all **response steps** taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, **the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.**

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. **Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.** Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 Monitoring Data Availability [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

(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 [326 IAC 2-8-4(3)(B)]

(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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(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 2-8-4(3)(C)]

(a) **To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly 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 quarterly 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.

19. Upon further review, Condition D.2.2, Preventive Maintenance Plan, of the FESOP has been deleted since the metal stamping press line does not meet the criteria necessary to require a Preventive Maintenance Plan. All subsequent conditions in Section D.2 have been re-numbered. The rule cite for Preventive Maintenance Plan in Condition D.1.2 of the FESOP has been changed from 326 IAC 2-8-4(9) to 326 IAC 2-8-3(c)(6). The condition now reads as follows (changes in bold):

D.1.2 Preventive Maintenance Plan **[326 IAC 2-8-3(c)(6)]**

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

20. Conditions D.1.3 and D.2.3 (now re-numbered as D.2.2) of the FESOP have been revised to read as follows (changes in bold):

D.1.3 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

D.2.2 Testing Requirements [326 IAC 2-8-5(1)]

Testing of this facility is not required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-1-4(f), 326 IAC 2-8-4, and 326 IAC 2-8-5.

21. Condition D.1.4 of the FESOP has been revised for clarification (changes in bold or strikeout):

D.1.4 Work Practices [326 IAC 8-1-6]

Pursuant to 326 IAC 8-1-6, ~~the flow coater shall have no add-on controls, and~~ the following work practices shall be implemented **for the flow coater**:

(1) the cleanup solvent containers used to transport solvent from drums to work stations shall be closed containers having soft gasketed spring-loaded closures;

(2) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;

(3) any solvent that may be sprayed during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as solvent spraying is complete.

22. An additional condition, Condition D.1.5, has been added to the FESOP regarding the VOC usage limits in Condition D.1.1. Conditions D.1.5 and D.1.6 have now been re-numbered as Conditions D.1.6 and D.1.7, respectively. Condition D.1.5 now reads as follows:

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition 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.

23. The Certification Form and the Deviation Occurrence Report Form (now the Emergency/Deviation Occurrence Report Form) included with the FESOP have been modified. An additional report form, the Quarterly Compliance Report Form, has also been added and is standard to all FESOPs.

EXHIBIT I

See P. 4 of 6 on TSD

PART 70 SIGNIFICANT SOURCE MODIFICATION
OFFICE OF AIR MANAGEMENT

Ispat Inland, Inc.
3210 Watling Street
East Chicago, Indiana 46312

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2, 326 IAC 2-3, 40 CFR 52.780 and 40 CFR 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.

Source Modification No.: 089-10472-00316	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 and Section D.1 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(15)]

The Permittee owns and operates an integrated steel mill.

Responsible Official:	John D. Fekete
Source Address:	3210 Watling Street, East Chicago, Indiana 46312
Mailing Address:	3210 Watling Street MC 8-130, East Chicago, Indiana 46312
SIC Code:	3312
County Location:	Lake
County Status:	Nonattainment for PM_{10}, SO_2, ozone and CO (portions only) Attainment area for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

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

This permit is to construct and operate a continuous coating line (CCL No. 6), with a maximum throughput of 600,000 tons per year, consisting of the following emissions units:

(a) One (1) electrical resistance welder exhausting inside the building.

(b) One (1) alkali cleaning system, consisting of electrolytic and sodium hydroxide dunk tanks, and a brush scrubbers rinse tank, and exhausting inside the building.

(c) One (1) natural gas-fired strip dryer, identified as source ID 250, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(d) One (1) natural gas-fired radiant tube furnace heating section, identified as source ID 251A, with a heat input capacity of 102.05 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(e) One (1) natural gas-fired radiant tube furnace soaking section, identified as source ID 251B, with a heat input capacity of 5.4 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(f) Two (2) zinc pots, one (1) aluminum pot, one (1) zinc premelt pot, and one (1) aluminum zinc premelt pot, with electric induction heating for each pot, and all exhausting inside the building.

(g) One (1) natural gas-fired galvanneal soaking furnace, identified as source ID 252, with a heat input capacity of 6.5 million Btu per hour, and exhausting inside the building.

(h) One (1) natural gas-fired strip dryer, identified as source ID 253, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(i) One (1) chem-treat roll coating system with one (1) natural gas-fired strip dryer, identified as source ID 254, with a heat input capacity of 2.05 million Btu per hour, and exhausting inside the building.

(j) One (1) phosphate roll coating system with one (1) natural gas-fired infra-red furnace, identified as source ID 255, with a heat input capacity of 9.36 million Btu per hour, and exhausting inside the building.

(k) Three (3) electrostatic oilers exhausting inside the building.

(l) Natural gas-fired space heaters, identified as source ID 256, with a heat input capacity of 77.52 million Btu per hour, and exhausting through one (1) stack, identified as 256.

(m) One (1) natural gas-fired boiler, identified as source ID 257, with a heat input capacity of 22.95 million Btu per hour, and exhausting through one (1) stack, identified as 257.

A.3 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).

This source has submitted their Part 70 (T-089-6577-00316) application on September 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Permit No Defense [IC 13]

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.

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

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

B.3 Effective Date of the Permit [IC 13-15-5-3]

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

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), 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.

B.5 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) 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 emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application such that a modification is required by 326 IAC 2-1.1 and 326 IAC 2-7-10.5, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) 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.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

SECTION C GENERAL OPERATION CONDITIONS

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

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this approval, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within the date of initial start-up, 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;

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

If due to circumstances beyond its control, the PMP 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 Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

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

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

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(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)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

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

All air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

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

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

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, 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 prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the 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.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

Compliance with applicable requirements shall be documented as required by this approval. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, within the date of initial start-up. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

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, 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 the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.8 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 approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.9 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(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 approval 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 approval 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 approval.

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

(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 for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. 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 written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(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 approval;

(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. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from a approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented upon initial start-up of these facilities.

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

(a) The reports required by conditions in Section D of this approval 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

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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.

(c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of initial start-up and ending on the last day of the reporting period.

SECTION D.1 FACILITY CONDITIONS

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

The No. 6 Continuous Coating Line, with a maximum throughput of 600,000 tons per year, consisting of the following equipment:

(a) One (1) electrical resistance welder exhausting inside the building.

(b) One (1) alkali cleaning system, consisting of electrolytic and sodium hydroxide dunk tanks, and a brush scrubbers rinse tank, and exhausting inside the building.

(c) One (1) natural gas-fired strip dryer, identified as source ID 250, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(d) One (1) natural gas-fired radiant tube furnace heating section, identified as source ID 251A, with a heat input capacity of 102.05 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(e) One (1) natural gas-fired radiant tube furnace soaking section, identified as source ID 251B, with a heat input capacity of 5.4 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(f) Two (2) zinc pots, one (1) aluminum pot, one (1) zinc premelt pot, and one (1) aluminum zinc premelt pot, with electric induction heating for each pot, and all exhausting inside the building.

(g) One (1) natural gas-fired galvanneal soaking furnace, identified as source ID 252, with a heat input capacity of 6.5 million Btu per hour, and exhausting inside the building.

(h) One (1) natural gas-fired strip dryer, identified as source ID 253, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(i) One (1) chem-treat roll coating system with one (1) natural gas-fired strip dryer, identified as source ID 254, with a heat input capacity of 2.05 million Btu per hour, and exhausting inside the building.

(j) One (1) phosphate roll coating system with one (1) natural gas-fired infra-red furnace, identified as source ID 255, with a heat input capacity of 9.36 million Btu per hour, and exhausting inside the building.

(k) Three (3) electrostatic oilers exhausting inside the building.

(l) Natural gas-fired space heaters, identified as source ID 256, with a heat input capacity of 77.52 million Btu per hour, and exhausting through one (1) stack, identified as 256.

(m) One (1) natural gas-fired boiler, identified as source ID 257, with a heat input capacity of 22.95 million Btu per hour, and exhausting through one (1) stack, identified as 257.

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

D.1.1 Particulate Matter (PM) [326 IAC 6-1-2] [326 IAC 6-2-4]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the combustion facilities (Source ID 250, 251A, 251B and 252 through 256) shall not exceed 0.01 grain per dry standard cubic foot (gr/dscf).

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the non-combustion facilities, including the electric resistance welder and alkali cleaning system, shall not exceed 0.03 grain per dry standard cubic foot (gr/dscf).

(c) Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the boiler (Source ID 257) shall not exceed 0.116 pound per million Btu (lb/MMBtu) heat input. This limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ where Q = Total source heat input capacity (MMBtu/hr); and Pt = Allowable emission rate (lb/MMBtu)

D.1.2 Emission Offset [326 IAC 2-3]

(a) The natural gas-fired space heaters (Source ID 256) shall use less than 300 million cubic feet (MMCF) per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit NO_X from the space heaters to 15 tons per year. Therefore, the Permittee will have enough NO_X offset credits to meet the requirements of 326 IAC 2-3 (Emission Offset) for this project.

(b) Pursuant to 326 IAC 2-3 (Emission Offset), the 76" Hot Strip Mill, 100" Plate Mill and No. 4 Slabber Pits #19 through 45 shall be permanently shut down prior to operation of the No. 6 Continuous Coating Line. Therefore, the Permittee shall meet the requirements to offset their VOC and NO_X increases from this project. These shutdowns will provide 502.3 tons of NO_X and 7.3 tons of VOC.

(c) The volatile organic compound (VOC) emissions from the radiant tube furnace heating and soaking sections (Source IDs 251A and 251B) shall not exceed 1.4 pounds per million cubic feet (lb/MMCF). Therefore, the Permittee shall meet the offset requirements of 326 IAC 2-3 (Emission Offset).

D.1.3 Heat Input Capacities

The heat input capacities stated in the application and in the description of equipment shall be limited as follows:

(a) The natural gas-fired strip dryer, identified as source ID 250, shall not exceed a heat input capacity of 2.04 million Btu per hour.

(b) The natural gas-fired radiant tube furnace heating section, identified as source ID 251A, shall not exceed a heat input capacity of 102.05 million Btu per hour.

(c) The natural gas-fired radiant tube furnace soaking section, identified as source ID 251B, shall not exceed a heat input capacity of 5.4 million Btu per hour.

(d) The natural gas-fired galvanneal soaking furnace, identified as source ID 252, shall not exceed a heat input capacity of 6.5 million Btu per hour.

(e) The natural gas-fired strip dryer, identified as source ID 253, shall not exceed a heat input capacity of 2.04 million Btu per hour.

(f) The natural gas-fired strip dryer, identified as source ID 254, shall not exceed a heat input capacity of 2.05 million Btu per hour.

(g) The natural gas-fired infra-red furnace, identified as source ID 255, shall not exceed a heat input capacity of 9.36 million Btu per hour.

(h) The natural gas-fired space heaters, identified as source ID 256, shall not exceed a heat input capacity of 77.52 million Btu per hour.

(i) The natural gas-fired boiler, identified as source ID 257, shall not exceed a heat input capacity of 22.95 million Btu per hour.

D.1.4 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the boiler exhausting to stack 257described in this section except when otherwise specified in 40 CFR Part 60, Subpart Dc.

D.1.5 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1]

All combustion facilities listed in this permit shall use natural gas as the only fuel. Therefore, the requirements of 326 IAC 7-1.1 (SO_2 Emissions Limitations) will not apply.

D.1.6 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-1-4(f)] [326 IAC 3-6]

The Permittee shall perform compliance stack tests for VOC emissions from the radiant tube furnace heating and soaking sections (Source IDs 251A and 251B) within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. These tests shall be performed in accordance with Section C - Performance Testing using the methods specified in the rule or as approved by the Commissioner. In addition to these requirements, IDEM may require compliance testing when necessary to determine if these facilities are in compliance.

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

D.1.8 Record Keeping Requirements [326 IAC 2-1-3(i)(8)]

(a) To document compliance with Condition D.1.2(a), the Permittee shall maintain the following records:

(1) Calendar dates covered in the compliance determination period; and

(2) Actual natural gas usage for the space heaters since last compliance determination period.

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

D.1.9 Reporting Requirements [326 IAC 2-1-3(i)(8)]

A quarterly summary of the information to document compliance with Condition D.1.2(a) shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days of the end of the reporting period.

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

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name:	Ispat Inland, Inc.
Source Address:	3210 Watling Street, East Chicago, Indiana 46312
Mailing Address:	3210 Watling Street MC 8-130, East Chicago, Indiana 46312
Source Modification No.:	089-10472-00316

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

Please check what document is being certified:

- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (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:

Date:

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

Part 70 Quarterly Report

Source Name:	Ispat Inland, Inc.
Source Address:	3210 Watling Street, East Chicago, Indiana 46312
Mailing Address:	3210 Watling Street MC 8-130, East Chicago, Indiana 46312
Source Modification No.:	089-10472-00316
Facility:	Space Heating (Source ID 256)
Parameter:	Natural Gas Usage
Limit:	300 million cubic feet (MMCF) per twelve (12) consecutive month period

YEAR: _____

Month	Natural Gas Usage This Month (MMCF)	Natural Gas Usage Previous 11 Months (MMCF)	Natural Gas Usage 12 Month Total (MMCF)

□ 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 Management

Technical Support Document (TSD) for New Construction and Operation

Source Background and Description

Source Name:	Ispat Inland, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake
Construction Permit No.:	CP-089-10472-00316
SIC Code:	3312
Permit Reviewer:	Bryan Sheets

The Office of Air Management (OAM) has reviewed an application from Ispat Inland, Inc. (Inland), relating to the construction and operation of the No. 6 Continuous Coating Line, which will galvanize steel sheets at a maximum capacity of 200,000 tons per year. The No. 6 Continuous Coating Line, consists of the following equipment:

(a) One (1) electrical resistance welder exhausting inside the building.

(b) One (1) alkali cleaning system, consisting of electrolytic and sodium hydroxide dunk tanks, and a brush scrubbers rinse tank, and exhausting inside the building.

(c) One (1) natural gas-fired strip dryer, identified as source ID 250, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(d) One (1) natural gas-fired radiant tube furnace heating section, identified as source ID 251A, with a heat input capacity of 102.05 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(e) One (1) natural gas-fired radiant tube furnace soaking section, identified as source ID 251B, with a heat input capacity of 5.4 million Btu per hour, and exhausting through one (1) stack, identified as 251.

(f) Two (2) zinc pots, one (1) aluminum pot, one (1) zinc premelt pot, and one (1) aluminum zinc premelt pot, with electric induction heating for each pot, and all exhausting inside the building.

(g) One (1) natural gas-fired galvanneal soaking furnace, identified as source ID 252, with a heat input capacity of 6.5 million Btu per hour, and exhausting inside the building.

(h) One (1) natural gas-fired strip dryer, identified as source ID 253, with a heat input capacity of 2.04 million Btu per hour, and exhausting inside the building.

(i) One (1) chem-treat roll coating system with one (1) natural gas-fired strip dryer, identified as source ID 254, with a heat input capacity of 2.05 million Btu per hour, and exhausting inside the building.

(j) One (1) phosphate roll coating system with one (1) natural gas-fired infra-red furnace, identified as source ID 255, with a heat input capacity of 9.36 million Btu per hour, and exhausting inside the building.

(k) Three (3) electrostatic oilers exhausting inside the building.

(l) Natural gas-fired space heaters, identified as source ID 256, with a heat input capacity of 77.52 million Btu per hour, and exhausting through one (1) stack, identified as 256.

(m) One (1) natural gas-fired boiler, identified as source ID 257, with a heat input capacity of 22.95 million Btu per hour, and exhausting through one (1) stack, identified as 257.

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 December 17, 1998, with additional information received on January 25, 26 and 29, 1999.

Emissions Calculations

See Appendix A (Emissions Calculation Spreadsheets) for detailed calculations (2 pages).

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)	79.75	7.5
Particulate Matter (PM10)	79.75	7.5
Sulfur Dioxide (SO_2)	0.6	0.6
Volatile Organic Compounds (VOC)	3.42	3.42
Carbon Monoxide (CO)	82.9	82.9
Nitrogen Oxides (NO_x)	211.5	211.5
Single Hazardous Air Pollutant (HAP)	1.78	1.78
Combination of HAPs	1.86	1.86

(a) Allowable PM emissions for the boiler are determined from the applicability of rule 326 IAC 6-2-4. Allowable PM emissions from the remaining facilities are determined from the applicability of rule 326 IAC 6-1-2. PM is assumed to equal PM_{10}. See attached spreadsheets for detailed calculations.

(b) The allowable emissions for the boiler and coating line based on the rules cited are greater than the potential emissions, therefore, the potential emissions are used for the permitting determination.

(c) Allowable emissions (as defined in the Indiana Rule) of NOx are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

County Attainment Status

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_X) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. A portion of Lake County has been designated as nonattainment for ozone. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Portions of Lake County have also been classified as nonattainment for CO, PM_{10} and SO_2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(c) Inland is located in the portion of Lake County classified as nonattainment for the above mentioned pollutants.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1,089
PM10	1,089
SO_2	14,595
VOC	4,525
CO	5,434
NO_x	12,009

(a) This existing source is a major stationary source because it is in one of the 28 listed source categories and at least one regulated pollutant is emitted at a rate of 100 tons per year or more.

(b) These emissions were based on the Facility Quick Look Report, dated 1996.

Proposed Modification

PTE from the proposed modification (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)	PM_{10} (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	6.1	6.1	0.5	2.82	67.5	193.2
Contemporaneous Increases from No.1 Normalizer Preheater Furnace, Annealing Furnace for No.1 Normalizer, No. 5 Galvanizing Line Radiant Tube Furnace, HRCC Project and Vacuum Degasser (proposed)				22.8		
Contemporaneous Decreases						
Net Emissions	6.1	6.1	0.5	25.6	67.5	193.2
Emission Offset Significant Level	25	15	40	25	100	40

Note: The natural gas usage at the space heating unit will be limited to 300 MMCF per year. Therefore, Inland will have enough NO_X credits to meet the requirements of 326 IAC 2-3 (Emission Offset).

This modification to an existing major stationary source is major for VOC and NO_X because the emissions increases are greater than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T-089-6577-00316) application on September 16, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

The 22.95 million Btu per hour boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart Dc). However, there are no applicable requirements for a boiler that combusts only natural gas.

The application of rust preventative oils to the steel coils is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60, Subpart TT) because this rule only applies to coating operations which use a curing oven and quench station as part of the process.

There are no other New Source Performance Standards (326 IAC 12) or National Emission Standards for Hazardous Air Pollutants (40 CFR Part 61 and 63) applicable to this source.

State Rule Applicability

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offsets), the following requirements shall be satisfied:

(a) The applicant shall demonstrate that all existing major sources owned or operated by the applicant in the state of Indiana are in compliance with all applicable emissions limitations and standards contained in the CAA and in this title. The Office of Enforcement has stated that there are no outstanding or unresolved issues for Inland as of February 11, 1999. Therefore, this requirement has been satisfied.

(b) The applicant will apply emission limitation devices or techniques to the proposed construction or modification such that the lowest achievable emission rate (LAER) for the applicable pollutant will be achieved. Inland will substitute an additional 1.3 offset amount as allowed by 326 IAC 2-3-2(b)(3). Therefore, this requirement has been satisfied.

(c) The applicant shall submit an analysis of alternative sites, sizes, production processes, and environmental control techniques for such proposed source which demonstrates that benefits of the proposed source significantly outweigh the environmental and social costs imposed as a result of its location, construction, or modification. The OAM has reviewed and accepted the alternative site analysis submitted by Ispat Inland, Inc. Therefore, this requirement has been satisfied.

(d) VOC and NO_X emissions resulting from the proposed construction or modification shall be offset by a reduction in actual emissions of the same pollutant from an existing source or a combination of existing sources.

For severe ozone nonattainment the minimum offset requirement is 1.3 to 1. The following calculation demonstrates that Ispat Inland, Inc. shall meet this requirement:

	NO_x (tons/yr)	VOC (tons/yr)
Project Emissions	193.2	2.82
Required Offsets (Project Emissions x 2.6)*	502.3	7.3
Available Offsets	532.1	11.0
Shutdown of 76" Hot Strip Mill (in 1995)	353.9	11.0
Shutdown of 100" Plate Mill (in 1995)	122.7	
Shutdown of No. 4 Slabber Pits 19-45 (in 1996)	55.5	
Excess Emission Credits	29.8	3.7

* The emissions are multiplied by 1.3 as required by 326 IAC 2-3-3, and an additional 1.3 substituted for LAER, pursuant to 326 IAC 2-3-2.

Since the credits are greater than offsets required by this rule, Inland complies with the requirements of 326 IAC 2-3 (Offset Emissions). After completion of this proposed modification, Inland has available offset credits from the No. 4 Slabber Pits 19-45 in the amount of 29.8 tons of NO_x/yr and from the 76" Hot Strip Mill in the amount of 3.7 tons of VOC/yr.

326 IAC 2-6 (Emission Reporting)

These facilities are subject to 326 IAC 2-6 (Emission Reporting), because the source emits more than 10 tons/yr of VOC and NO_x in Lake County . Pursuant to this rule, the owner/operator of this source must annually submit an emission statement of the source. The annual statement must be received by April 15 of each year and must contain the minimum requirements as specified in 326 IAC 2-6-4.

326 IAC 4-1 (Open Burning)

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 5-1 (Visible Emissions Limitations)

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

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

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

326 IAC 6-1-2 (Nonattainment Area Particulate Limitations)

Particulate matter emissions from all combustion facilities, excluding the boiler which is regulated by 326 IAC 6-2-4, shall not exceed 0.01 grains per dry standard cubic foot (gr/dscf). These include all facilities exhausting to stacks 250 through 256. Particulate matter emissions from all other noncombustion facilities, including the electrical resistance welder and alkali cleaning system, shall not exceed 0.03 grains per dry standard cubic foot.

326 IAC 6-2-4 (Particulate Emissions Limitations for Sources of Indirect Heating)

The 22.95 MMBtu/hr natural gas-fired boiler is subject 326 IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Pursuant to 326 IAC 6-2-4, the particulate matter (PM) emissions shall be limited to 0.116 pounds per million BTU heat input because the source's total heat input capacity is 5465.3 MMBtu/hr. The limitation is based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$ where Q = Total source heat input capacity (MMBtu/hr); and Pt = Allowable emission rate (lb/MMBtu)

326 IAC 6-4 (Fugitive Dust Emissions)

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 7-1.1 (Sulfur Dioxide Emission Limitation)

All of the combustion units associated with this project will be required to use natural gas as the only fuel. Therefore, the requirements of 326 IAC 7-1.1 will not apply.

326 IAC 8-2-4 (Coil Coating Operations)

The process of applying zinc, aluminum and oils to the steel coils are not subject to this rule because actual emissions of VOC from the coating operations will be less than 15 pounds per day.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 189 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 less than those which constitute a major source according to Section 112 of the 1990 Amendments to Clean Air Act.

(b) See attached spreadsheets for detailed air toxic calculations.

Conclusion

The construction of this continuous coating line will be subject to the conditions of the attached proposed **Construction Permit No. CP-089-10472-00316.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for New Construction and Operation

Source Name:	Ispat Inland, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake
Construction Permit No.:	CP-089-10472-00316
SIC Code:	3312
Permit Reviewer:	Bryan Sheets

On April 2, 1999, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana, stating that Ispat Inland, Inc. had applied for a construction permit to construct and operate a continuous coating line used to galvanize steel coils. 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 April 23, 1999, the U.S. EPA submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

Comment 1:

> The potential emission numbers for NOx and VOC on page 2 of the TSD (211.5 for NOx and 3.42 for VOC) are slightly higher than the amounts listed on page 3, why is there are difference in the numbers.

Response 1:

> The table on page 2 of the TSD lists potential emissions based on the enforceable emission factors and operation at 8,760 hours per year. The table on page 3 lists the limited potential to emit, which in this case includes a natural gas usage limit for the space heating unit.

Comment 2:

> The emissions calculations do not include the following equipment: electrical resistance welder, alkali cleaning system, 2 zinc pots, aluminum pot, and zinc premelt pot. Aren't there any emissions from these units?

Response 2:

> The zinc and aluminum pots are electrically heated and contain only molten zinc and aluminum and are not considered to have any emissions. The alkali cleaning system consists of two tubs, one with an alkali solution and scrubbers and the other a rinse tank. Since the scrubbers are located under the alkali solution, no emissions are expected from this operation. And finally, the OAM is unaware of any emission factors for electrical resistance welding and based on past permitting and field experience believes that the welding will have negligible amounts of particulate matter emissions.

Therefore, the OAM did not perform any emissions calculation for this equipment.

Comment 3:

The calculations show that 0.31 tpy of VOC are emitted from the electrostatic oilers. Are any other pollutants emitted from these oilers?

Response 3:

The electrostatic oilers apply a very small amount of oil to the steel sheets before they are rolled into coils. This type of application produces negligible amounts of particulate matter. Therefore, the OAM believes that VOC is the only measurable pollutant emitted.

Comment 4:

The shutdown of the 76" Hot Strip Mill, 100" Plate Mill, and #4 Slabber Pits is used to obtain the 2.6 to 1 in NOx and VOC offsets. Are these offset credit amounts based on last 2 years of actual emissions at these facilities?

Response 4:

The offset credit amounts for the 76" Hot Strip Mill and 100" Plate Mill were both based on the last 2 years of actual emission at those facilities. However, the #4 Slabber Pits offset credits were based on 1993 and 1994 data even though it was shut down in 1996. This was due to the fact that in 1995 almost all of the steel made at the BOFs were taken to the continuous casters instead of being cast into ingots. Therefore, the slabber pits were not utilized in a manner consistent with their previous operations. Inland has provided emissions records which indicate that the years used were representative of normal operations and were not used just because they were peak years.

Comment 5:

Permit condition D.1.2(c) limits the VOC emission rate for the radiant tube furnace heating and soaking sections and the galvanneal soaking section. How will this rate be achieved (controls? throughput limits?)? Also, how will compliance with the 1.4 lb/MMCF be verified?

Response 5:

The VOC emission rate for the galvanneal soaking section is not 1.4 lbs/MMCF and the wording in Condition D.1.2(c) will be corrected. The limit of 1.4 lbs/MMCF for the radiant tube furnace heating and soaking sections will be verified during stack tests required by Condition D.1.7.

Comment 6:

Permit condition D.1.3 limits the heat input capacities for several units. If these are not the physical capacities of the units- a)how are these restrictions achieved?; and b)how will these limits be verified?

Response 6:

Since this permit relies on emission offsets for NOX, the OAM felt that it was necessary to make the heat input capacities for the combustion units federally enforceable. These are their maximum capacities and are not further limited in any way.

On April 30, 1999, Ispat Inland, Inc. (Inland) submitted comments on the proposed construction permit. The summary of the comments and corresponding responses is as follows (changes are bolded for emphasis):

Comment 1:

Inland submitted several comments regarding Condition B.5. They are summarized below.

On page 5 of 15, Condition B.5(a) should state: "The attached affidavit of construction...verifying that the emission units were constructed ~~as proposed in the application~~ **in conformity with the requirements and intent of the construction permit application.**"

As proposed, the language is slightly different than the affidavit language. Certification in the affidavit is based on the facility being constructed in accordance with the intent of the application. For example, if the furnace dimensions are slightly different than shown in the application (with no effect on air quality), the affidavit can still be signed because the intent of the application has not been altered (no effect on air quality).

Response 1:

The affidavit of construction form must meet the minimum requirements of 326 IAC 2-7-10.5(h). An affidavit of construction may still be submitted even if there have been changes in construction. The requirements of 326 IAC 2-7-10.5(h) allow the source to include any changes to equipment that may be different than what was proposed in the application. If these changes do not affect permitting determinations, a operation permit validation letter will be issued. The IDEM, OAM does not believe it is necessary to change the language as requested in the first sentence of Condition B.5(a).

Comment 2:

On page 5 of 15, Condition B.5(a) should state: "The emissions units covered in the Significant Source Modification approval may begin ~~operating~~ **commercial operation** on the date...proposed. **Commercial operation shall be defined as the date the first coil is produced at No. 6 Continuous Coating Line to fulfill a customer order.**"

Some equipment, such as burners, may be installed and tested in phases prior to or in conjunction with the construction of other emissions units. Testing equipment during construction is normal and necessary to assure proper operation. However, burner testing may be considered start of operation requiring an affidavit.

Response 2:

The suggested language would allow a source to start production prior to receiving the operation permit validation letter, which defeats the intent of the rule. If it is necessary for Inland to complete construction in phases, more than one affidavit of construction may be submitted. This should allow Inland to construct and test a unit after an operation permit validation letter has been issued for that unit while construction is still proceeding on other emissions units at the source. The IDEM, OAM does not believe it is necessary to add the suggested language.

Comment 3:

On page 5 of 15, Condition B.5(b) should state: "If actual construction of the emissions units differs from the construction proposed in the application **such that air quality is adversely affected**, the source may not begin operation..."

Slight variations from the application not related to air quality should not require modification.

Response 3:

The IDEM, OAM agrees that clarification should be made regarding what constitutes changes that could not be included in the affidavit of construction and would require additional review. The following change will be made:

(b) If actual construction of the emissions units differs from the construction proposed in the application **such that a modification is required by 326 IAC 2-1.1 and 326 IAC 2-7-10.5**, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

Comment 4:

On page 6 of 15, Condition C.2(a) should state: "...prepare and maintain Preventative Maintenance Plans (PMP) within ninety (90) days after ~~issuance of this approval~~ **commercial startup**..."

Often specific equipment is unknown within 90 days after issuance of approval and therefore is impossible to write an effective PMP. In addition air quality cannot be affected until startup. Although a provision exists to extend PMP preparation, in almost all cases sources would be required to request an extension due to unknown equipment, thereby increasing work load for the source and IDEM.

Response 4:

The IDEM, OAM agrees that this language should be clarified for situations where design and construction may not begin within ninety (90) days after issuance of the approval. However, waiting until ninety (90) days after commercial start-up does not fulfill the intent of this requirement. Instead, IDEM, OAM believes the following language provides adequate time to prepare a PMP:

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ~~ninety (90) days after issuance of this approval~~ **the date of initial start-up**, including the following information on each facility:

Comment 5:

On page 8 of 15, Condition C.7 should state: "...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 approval~~ **commercial startup**."

Impossible in most cases unless the emission unit is installed. For example, if a CEM were required, a source would be required to install the CEM within 90 days of approval on a stack that has yet to be constructed.

Response 5:

The IDEM, OAM agrees that the language should be clarified for situations where construction of the equipment has not been completed. However, waiting until ninety (90) days after commercial start-up does not fulfill the intent of this requirement. Instead, IDEM, OAM believes the following language provides adequate time to install any necessary monitoring equipment:

Compliance with applicable requirements shall be documented as required by this approval. 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 approval~~ **within the date of initial start-up**. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Comment 6:

On page 10 of 15, Condition C.10(d) should state: "All recordkeeping requirements not already legally required shall be implemented within ninety (90) days of ~~approval issuance~~ **commercial startup.**"

In general, unless recordkeeping of construction related activities are required, there are generally no emission activities until startup and therefore no need to keep records.

Response 6:

The IDEM, OAM agrees that record keeping requirements generally do not begin until the equipment begins operating. However, waiting until 90 days after commercial startup does not fulfill the intent of this requirement. Instead, the language will be changed as follows:

(d) All record keeping requirements not already legally required shall be implemented ~~within ninety (90) days of approval issuance~~ **upon initial start-up of these facilities**.

Comment 7:

On page 10 of 15, Condition C.11(d) should state: "The first report shall cover the period commencing on the date of ~~issuance of this approval~~ **commercial startup** and ending on the last day of the reporting period."

No need to report zero natural gas usage for space heating during construction. Reporting should start after commercial startup.

Response 7:

The IDEM, OAM agrees that reporting requirements generally do not begin until the equipment begins operating. However, waiting until 90 days after commercial startup does not fulfill the intent of this requirement. Instead, the language will be changed as follows:

(d) The first report shall cover the period commencing on the date of ~~issuance of this approval~~ **initial start-up** and ending on the last day of the reporting period.

Comment 8:

On page 12 of 15, Condition D.1.2(b) should state: "...~~These shutdowns will leave the Permittee with banked offset credits of 28.9 tons NOx from the shutdown of the No. 4 Slabber Pits #19 through 45 and 3.7 tons of VOC from the shutdown of the 76" Hot Strip Mill.~~ **These shutdowns will provide 502.3 tons of NOx and 7.3 tons of VOC.**"

Remaining credits should not be included in the permit. Rather the credits required for offsets should be listed. The primary concern with listing credits remaining is that periodically EPA changes factors. Often times, when banked emissions are based on these factors, the bank must be readjusted to reflect these more accurate factors. Thus the available offsets can go up or down depending upon the change.

Response 8:

The IDEM, OAM does agrees that the best available information should be used to determine actual emissions. Therefore, the condition will be changed as requested.

Comment 9:

Inland has found the following errors in the Technical Support Document (TSD):

On page 1 of 16 of the TSD, the first paragraph should state: "...at a maximum capacity of ~~200,000~~ **600,000** tons per year..."

On page 3 of 6 of the TSD, the subsection (b) under the County Attainment Status should state that Ispat Inland is in the CO attainment portion of the county. Emission Offset review does not apply for CO.

On Page 3 of 4 of Appendix A to the TSD, the title block should state: "~~Bituminous Coal~~ **Natural Gas** Combustion"

Response 9:

It is OAM policy to use this TSD addendum to serve as the documentation for any changes made to the proposed approval. Therefore, the TSD will not be amended; but it is noted that the IDEM, OAM agrees that these errors were made. However, for purposes of Appendix A, the change will be made.

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

To clarify that the VOC limit of 1.4 pounds per million cubic feet of natural gas combusted only applies to the radiant tube furnace, Condition D.1.2(c) has been amended as follows on page 12 of 15 of the final permit:

(c) The volatile organic compound (VOC) emissions from the radiant tube furnace heating and soaking sections ~~and the galvanneal soaking section~~ (Source IDs 251A and 251B) shall not exceed 1.4 pounds per million cubic feet (lb/MMCF). Therefore, the Permittee shall meet the offset requirements of 326 IAC 2-3 (Emission Offset).

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Ispat Inland, Inc.
Address City IN Zip: 3210 Watling St., East Chicago, IN 46312
CP: 089-10472-00316
Plt ID: 089-00316
Reviewer: Bryan Sheets
Date: 1/22/99

A. Strip Dryers, Infra-Red Oven and Boiler

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
38	330.1

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emissions (tons/yr)	1.3	1.3	0.1	16.5	0.908	13.9

B. Space Heating

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)	Limited Throughput (MMCF/yr)
77.5	565.8	300 0

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emissions (tons/yr)	2.5	2.5	0.2	33.3	1.831	28.0
Limited Emissions (tons/yr)	1.1	1.1	0.1	15.0	0.8	12.6

C. Radiant Tube Furnace Heating Section

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
102.5	876.4

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	348.0	1.4	84.0
Potential Emissions (tons/yr)	3.3	3.3	0.3	152.5	0.614	36.8

Methodology

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, except NOx and VOC emission factors for Radiant Tube Furnace which are vendor guaranteed.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr / 1,020 MMBtu/MMCF

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

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

Appendix A: Emissions Calculations
Natural Gas Combustion

Company Name: Ispat Inland, Inc.
Address City IN Zip: 3210 Watling St., East Chicago, IN 46312
CP: 089-10472-00316
Plt ID: 089-00316
Reviewer: Bryan Sheets
Date: 1/22/99

D. Radiant Tube Furnace Soaking Section

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
5.4	46.4

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	249.0	1.4	84.0
Potential Emissions (tons/yr)	0.2	0.2	0.0	5.8	0.032	1.9

E. Galvanneal Soaking Section

Heat Input Capacity (MMBtu/hr)	Potential Throughput (MMCF/yr)
6.5	55.8

	PM	PM10	SO2	NOx	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	121.0	5.5	84.0
Potential Emissions (tons/yr)	0.2	0.2	0.0	3.4	0.154	2.3

Methodology

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1 and 1.4-2, except NOx and VOC emission factors for Radiant Tube Furnace and Galvanneal Furnace which are vendor guaranteed.

Potential Throughput (MMCF/yr) = Heat Input Capacity (MMBtu/hu) x 8,760 hrs/yr / 1,020 MMBtu/MMCF

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

Appendix A: Emissions Calculations
Natural Gas Combustion
HAP Calculations

Company Name: Ispat Inland, Inc.
Address, City IN Zip: 3210 Watling Street, East Chicago, IN 46312
CP: '089-10472-00316
Plt ID: '089-00316
Reviewer: Bryan Sheets
Date: 1/22/99

Potential Throughput (MMCF/yr)

1974.5

HAP	Emission Factor (lbs/MMCF)	Emissions (lbs/yr)	(tons/yr)
2-Methylnaphthalene	2.40E-05	0.05	0.00
3-Methylchloranthrene	1.80E-06	0.00	0.00
7,12-Dimethylbenz(a)anthracene	1.60E-05	0.03	0.00
Acenaphthene	1.80E-06	0.00	0.00
Acenaphthylene	1.80E-06	0.00	0.00
Anthracene	2.40E-06	0.00	0.00
Arsenic Compounds	2.00E-04	0.39	0.00
Benz(a)anthracene	1.80E-06	0.00	0.00
Benzene	2.10E-03	4.15	0.00
Benzo(a)pyrene	1.20E-06	0.00	0.00
Benzo(b)fluoranthene	1.80E-06	0.00	0.00
Benzo(g,h,i)perylene	1.20E-06	0.00	0.00
Benzo(k)fluoranthene	1.80E-06	0.00	0.00
Beryllium Compounds	1.20E-05	0.02	0.00
Cadmium Compounds	1.10E-03	2.17	0.00
Chromium Compounds	1.40E-03	2.76	0.00
Chrysene	1.80E-06	0.00	0.00
Cobalt Compounds	8.40E-05	0.17	0.00
Dibenzo(a,h)anthracene	1.20E-06	0.00	0.00
Dichlorobenzene	1.20E-03	2.37	0.00
Fluoranthene	3.00E-06	0.01	0.00
Fluorene	2.80E-06	0.01	0.00
Formaldehyde	7.50E-02	148.09	0.07
Hexane	1.80E+00	3554.10	1.78
Indeno(1,2,3-cd)pyrene	1.80E-06	0.00	0.00
Manganese Compounds	3.80E-04	0.75	0.00
Mercury Compounds	2.60E-04	0.51	0.00
Naphthalene	6.10E-04	1.20	0.00
Nickel Compounds	2.10E-03	4.15	0.00
Phenanathrene	1.70E-05	0.03	0.00
Pyrene	5.00E-06	0.01	0.00
Selenium Compounds	2.40E-05	0.05	0.00
Toluene	3.40E-03	6.71	0.00
TOTAL HAPs		**3727.77**	**1.86**

METHODOLOGY

Potential Emissions (tons/yr) = Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) / 2000 lbs/ton

Emission Factors are from AP 42, Tables 1.4-3 and 1.4-4.

Appendix A: Emissions Calculations
Allowable Emissions

Company Name: Ispat Inland, Inc.
Address City IN Zip: 3210 Watling St., East Chicago, IN 46312
CP: 089-10472-00316
Plt ID: 089-00316
Reviewer: Bryan Sheets
Date: 1/22/99

A. Natural Gas-Fired Boiler

Pursuant to 326 IAC 6-2-4, PM emissions from the boiler shall be limited to an amount determined by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where Pt = allowable emission rate (lbs/MMBtu)
Q = total source maximum operating capacity (lb/MMBtu)

Since Q for Ispat Inland's source is greater than 10,000 MMBtu/hr, the above equation would result in Pt equalling a number less than 0.1 lbs/MMBtu. However, pursuant to 326 IAC 6-2-4(b), for any source with Q greater than 10,000 MMBtu/hr, the limit shall be 0.1 lbs/MMBtu.

Potential emissions from the boiler are 0.171 lbs/hr and the heat input capacity is 22.95 MMBtu/hr.

$$\frac{0.171 \text{ lbs/hr}}{22.95 \text{ MMBtu/hr}} = 0.007 \text{ lbs/MMBtu}$$

Therefore, the boiler can comply with 326 IAC 6-2-4.

B. Natural Gas-Fired Furnaces

Pursuant to 326 IAC 6-1-2, PM emissions from the natural gas-fired furnaces shall not exceed 0.01 grains per dry standard cubic foot.

The outlet grain loading from the furnaces are:

Facility	Potential Emissions (lbs/hr)	Flow Rate (cfm)	Outlet Grain Loading (gr/dscf)
Strip Dryer #1	0.015	351	0.005
Radiant Tube Heating	0.76	17542	0.005
Radiant Tube Soaking	0.04	929	0.005
Galvanneal Soaking	0.048	1118	0.005
Strip Dryer #2	0.015	351	0.005
Strip Dryer #3	0.015	351	0.005
Phosphate Coating	0.07	1610	0.005
Space Heating	0.578	13332	0.005

Outlet Grain Loading (gr/dscf) = Potential Emissions (lbs/hr) x 7000 gr/lb / 60 min/hr / Flow Rate (cfm)
Assume acf = dscf

Therefore, the natural gas-fired furnaces can comply with 326 IAC 6-1-2.

C. Electric Resistance Welding and Alkali Cleaning System

Pursuant to 326 IAC 6-1-2, PM emissions from the other PM emitting facilities shall not exceed 0.03 grains per dry standard cubic foot.

The electric resistance welding, melting pots and alkali cleaning system constitute the remaining PM emitting facilities. PM emissions from these facilities are considered to be negligible and will be assumed in compliance with 326 IAC 6-2-4.

D. Electrostatic Oiler

To determine the VOC emissions from the application of oil, the following assumption will be made:

The amount of VOC per gallon of oil is approximately 0.01% by weight. This is consistent with other oils used in this type of application. In addition, a conservative estimate of 1 lb of oil used for every ton of steel produced will yield the following emissions:

0.13 gallons oil/ton steel x 600,000 tons steel/yr x 0.008 lb VOC/gal / 2000 lbs/ton = 0.31 tpy

EXHIBIT J

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

See next page and p. 4 of 5.

TO: Interested Parties / Applicant

DATE: January 31, 2006

RE: Kasle Metal Processing / 019-22372-00119

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER-AM.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

January 31, 2006

Mr. Thomas Woods
Kasle Metal Processing
5146 Maritime Road
Jeffersonville, IN 47130

Dear Mr. Woods:

Re: Exempt Construction and Operation Status,
019-22372-00119

The application from Kasle Metal Processing, received on December 15, 2005 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following steel blanking facility, to be located at 5146 Maritime Road, Jeffersonville, Indiana, is classified as exempt from air pollution permit requirements:

(a) Two (2) EGL-1 application lines, applying rust preventive surface coating to steel blanks, (identified as EGL Application Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(b) Two (2) wash lines (identified as Wash Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(c) Two (2) 2.5 MMBtu Natural gas-fired boilers, identified as Boiler 1 and 2, using no control, exhausting to the atmosphere.

(d) Four (4) 1.55 MMBtu Natural gas-fired Air Make-Up Units, with no unit I.D.'s and using no control, exhausting to the atmosphere.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

(2) Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)), particulate emisisons from indirect heating facilities constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where

Q = total source heat input capacity (MMBtu/hr)
Pt = emission rate limit (lbs/MMBtu)

Therefore, particulate emissions from the two (2) 2.5 MMBtu/hr boilers shall not exceed 0.6 lb/MMBtu heat input.

This exemption is the first air approval issued to this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Origin signed by

Nysa L. James, Section Chief
Permits Branch
Office of Air Quality

JF

cc: File - Clark County
Clark County Health Department
Air Compliance – Ray Schick
Permit Review Section #1 – James Farrell

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Kasle Metal Processing**
Source Location:	**5146 Maritime Road, Jeffersonville, IN 47130**
County:	**Clark**
SIC Code:	**3479**
Operation Permit No.:	**019-22372-00119**
Permit Reviewer:	**James Farrell**

The Office of Air Quality (OAQ) has reviewed an application from Kasle Metal Processing relating to the construction and operation of a steel blanking facility. The steel blanking process shapes steel coils into blanks and then applies a non-HAP surface coating as a rust preventative.

New Emission Units and Pollution Control Equipment

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

(a) Two (2) EGL-1 application lines, applying rust preventive surface coating to steel blanks, (identified as EGL Application Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(b) Two (2) wash lines (identified as Wash Line 1 and 2), with a maximum capacity of 300 feet per minute, each, using no control, exhausting to the atmosphere.

(c) Two (2) 2.5 MMBtu Natural gas-fired boilers, identified as Boiler 1 and 2, using no control, exhausting to the atmosphere.

(d) Four (4) 1.55 MMBtu Natural gas-fired Air Make-Up Units, with no unit I.D.'s and using no control, exhausting to the atmosphere.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation 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.

A complete application for the purposes of this review was received on December 15, 2005.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. The calculations can be found in the application file.

Potential to Emit Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions 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, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	0.38
PM-10	0.38
SO_2	0.03
VOC	3.17
CO	4.12
NO_x	4.91

HAPs	Potential to Emit (tons/yr)
Single HAP	<10
Combination HAPs	<25

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Clark County.

Pollutant	Status Status
PM-10	Attainment
PM-2.5	Nonattainment
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) 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 NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Clark County has been classified as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements.

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

(d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	<5
PM-10	<5
SO_2	<10
VOC	<10
CO	<25
NO_x	<10
Single HAP	<10
Combination HAPs	<25

(a) This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 2-3, the PSD and Emission Offset requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:
(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.460, Subpart TT – Standards and Performance for Metal Coil Surface Coating Operations, which applies to prime coat, finish coat and prime and finish coat combined operations because it is not a prime or finish coat operation. Therefore, this NSPS is not included in this exemption.

(b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.40c, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, which applies to steam generating units constructed, modified or reconstructed after June 9, 1989 and has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu per hour (Btu/hr)) or less, but greater than or equal to 2.9 MW (10 million Btu/hr) because each of the boilers have heat input values of less than 10 million Btu/hr. Therefore, this NSPS is not included in this exemption.

(c) The metal coil surface coating unit is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MMMM – (Surface Coating of Miscellaneous Metal Part and Products) because it does not apply topcoat to automobile or light-duty truck body parts and is not a major source of HAPs.

(d) The metal coil surface coating unit is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart SSSS – (Surface Coating of Metal Coil) because it is not a major source of HAPs.

(e) The two (2) 2.5 MMBtu/hr boilers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart DDDDD – Standards for Industrial, Commercial and Institutional Boilers and Process Heaters, because it is not a major source of HAPs.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)
This source is not required to have an operating permit under 326 IAC 2-7, does not emit lead into the ambient air at levels $\geq$ 5 tpy, and is located in Clark County. Therefore, 326 IAC 2-6 does not apply.

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

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period 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.

State Rule Applicability – Individual Facilities

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

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))
Pursuant to 326 IAC 6-2-4(a) particulate emisisons from indirect heating constructed after September 21, 1983 shall be limited by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where

Q = total source heat input capacity (MMBtu/hr)
Pt = emission rate limit (lbs/MMBtu)

Therefore, particulate emissions from the two (2) 2.5 MMBtu/hr boiler shall not exceed 0.6 lb/mmBtu heat input because the total source maximum operating capacity heat input for indirect heating is less than 10 MMBtu/hr.

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))
This rule is not applicable to the air make-up units because they are not sources of indirect heating. Therefore, the requirements of 326 IAC 6-2-4 do not apply to the air make-up units.

326 IAC 6-3-1 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 6-3-1(b)(1), the two (2) 2.5 MMBtu boilers are exempt from the requirements of 6-3-1 because it uses combustion for indirect heating. Therefore, the requirements of 326 IAC 6-3-1 do not apply to the boilers.

326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices, and Control Technologies)
The emission units at this source have negligible Particulate emissions. Therefore the requirements of 326 IAC 6-3-2 do not apply.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)
The potential emissions from this steel blanking facility are less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-1 (Surface Coating Emissions Limitations)
This source is located in Clark County, the potential to emit of VOC from the facility is less than twenty-five (25) tons per year and actual emissions are less than fifteen (15) pounds per day. Therefore, pursuant to 326 IAC 8-2-1, 326 IAC 8-2-4 (Coil Coating Operations) and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) do not apply.

326 IAC 8-7-1 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
This source is located in Clark County, and the potential to emit of VOC is less than 100 tons per year and the coating facility has less than ten (10) tons per year of VOC. Therefore, 326 IAC 8-7-1 does not apply.

Conclusion

The construction and operation of this steel blanking facility shall be subject to the conditions of the Exemption 019-22372-00119.