



*Frank O'Bannon*  
Governor

*Lori F. Kaplan*  
Commissioner

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Indianapolis, Indiana 46206-6015  
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[www.state.in.us/idem](http://www.state.in.us/idem)

August 21, 2002

Mr. James Alexander  
U.S. Steel - Gary Works  
One North Broadway, MS-70  
Gary, Indiana 46402-3199

Re: Minor Source Modification No:  
089-15694-00121

Dear Mr. Alexander:

U.S. Steel - Gary Works applied for a Part 70 operating permit on December 13, 1996 for blast furnaces and steel mills. An application to modify existing permit limits was received on June 3, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

This project consists of removing a fuel limit taken previously (MSM 089-14424-00121) to make Emission Offset not applicable. The limit was taken in order to keep contemporaneous NOx emissions below twenty-five tons per year. As NOx is no longer considered an ozone precursor for non attainment permitting purposes, the limit is no longer needed.

The original project consisted of upgrading the existing Electrogalvanizing Line Package Boiler (EGL-1) to increase the steam operating pressure from 100 psig to 135 psig. This was accomplished by increasing the boiler's capacity from 38.9 MMBtu/hr to 39.147 MMBtu/hr. As stated in the original MSM for this project (089-14424-00121), the upgrade consisted of the following changes to the existing boiler:

- (a) replacement of the boiler feedwater pumps to increase feedwater supply pressure;
- (b) upgrade the level control system for the water level control in the boiler drum;
- (c) upgrade the boiler drum safety relief valves; and
- (d) upgrade the steam header pressure control system.

The natural gas fuel burners and fuel supply system were not changed as part of this project, and the capacity of the electrogalvanizing line was not changed. This was a quality control project intended to address the problem of "bald spots" (non-uniform zinc coating thickness) in the electrogalvanizing line.

This permit supercedes MSM 089-14424-00121. The proposed Minor Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). The source may begin operation upon issuance of the source modification approval.



This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mike Pring, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7840 to speak directly to Mr. Pring. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

#### Attachments

ERG/MP

cc: File - Lake County  
U.S. EPA, Region V  
Lake County Health Department  
City of Gary Division of Air Pollution Control  
Northwest Regional Office  
Air Compliance Section Inspector - Ramesh Tejula  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner  
Office of Air Enforcement - Brian Eaton

**PART 70 MINOR SOURCE MODIFICATION  
OFFICE OF AIR QUALITY  
and  
CITY OF GARY  
DIVISION OF AIR POLLUTION CONTROL**

**U.S. Steel - Gary Works  
One North Broadway, MS-70  
Gary, Indiana 46402-3199**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

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

Source Modification No.: 089-15694-00121	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 21, 2002

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Semi-Annual Natural Gas Fired Boiler Certification

## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Gary Division of Air Pollution Control. The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval 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)]

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The Permittee owns and operates a steel mill.

Responsible Official:	George Babcoke
Source Address:	One North Broadway, Gary, Indiana 46402
Mailing Address:	One North Broadway, Gary, Indiana 46402
Source Phone No.:	219-888-3387
SIC Code:	3312
County Location:	Lake
Source Location Status:	Nonattainment for ozone, PM-10, and SO <sub>2</sub> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules

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

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

This project consists of upgrading the existing Electrogalvanizing Line Package Boiler (EGL-1) to increase the steam operating pressure from 100 psig to 135 psig. This will be accomplished by increasing the boiler's capacity from 38.9 MMBtu/hr to 39.147 MMBtu/hr. The upgrade will consist of the following changes to the existing boiler:

- (a) replacement of the boiler feedwater pumps to increase feedwater supply pressure;
- (b) upgrade the level control system for the water level control in the boiler drum;
- (c) upgrade the boiler drum safety relief valves; and
- (d) upgrade the steam header pressure control system.

The natural gas fuel burners and fuel supply system will not be changed as part of this project, and the capacity of the electrogalvanizing line will not be changed. This is a quality control project intended to address the problem of "bald spots" (non-uniform zinc coating thickness) in the electrogalvanizing line.

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

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

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

## **SECTION B GENERAL CONSTRUCTION CONDITIONS**

### **B.1 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 the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

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

### **B.3 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.4 NSPS Reporting Requirement**

Pursuant to the New Source Performance Standards (NSPS), Part 60.40, Subpart Dc, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

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

and

Gary Division of Air Pollution Control  
504 North Broadway, Suite 1012  
Gary, Indiana 46402

The application and enforcement of these standards have been delegated to the IDEM, OAQ. The requirements of 40 CFR Part 60 are also federally enforceable.

### **B.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

(a) All terms and conditions of MSM 089-14424-00121, issued pursuant to permitting programs approved into the state implementation plan, have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) MSM 089-14424-00121 is superseded by this permit.

## SECTION C GENERAL OPERATION CONDITIONS

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

- (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, 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 requiring certification.
- (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) upon startup, 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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control  
504 North Broadway, Suite 1012  
Gary, Indiana 46402

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, and Gary Division of Air Pollution Control, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and Gary Division of Air Pollution Control. IDEM, OAQ, and Gary Division of Air Pollution Control, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP

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

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner, and Gary Division of Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner, and Gary Division of Air Pollution Control within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

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

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

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

and

Gary Division of Air Pollution Control  
504 North Broadway, Suite 1012  
Gary, Indiana 46402

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (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 Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

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

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The  $PM_{10}$  emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

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

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Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit 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.

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

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

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

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

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

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If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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

### C.9 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Gary Division of Air Pollution Control, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

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

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

and

Gary Division of Air Pollution Control  
504 North Broadway, Suite 1012  
Gary, Indiana 46402

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

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

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

The notification which shall be submitted by the Permittee does not require 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). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, and Gary Division of Air Pollution Control may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, and Gary Division of Air Pollution Control by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (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 response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (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, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do 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.11 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required data, reports 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. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Gary Division of Air Pollution Control makes a request for records to the Permittee, the Permittee shall

furnish the records to the Commissioner or Gary Division of Air Pollution Control within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.12 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The 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 Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Gary Division of Air Pollution Control  
504 North Broadway, Suite 1012  
Gary, Indiana 46402

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Gary Division of Air Pollution Control on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly or semi-Annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do 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 start-up after modifications are completed and ending on the last day of the reporting period. Reporting periods are based on calendar years.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

This project consists of upgrading the existing Electrogalvanizing Line Package Boiler (EGL-1) to increase the steam operating pressure from 100 psig to 135 psig. This will be accomplished by increasing the boiler's capacity from 38.9 MMBtu/hr to 39.147 MMBtu/hr. The upgrade will consist of the following changes to the existing boiler:

- (a) replacement of the boiler feedwater pumps to increase feedwater supply pressure;
- (b) upgrade the level control system for the water level control in the boiler drum;
- (c) upgrade the boiler drum safety relief valves; and
- (d) upgrade the steam header pressure control system.

The natural gas fuel burners and fuel supply system will not be changed as part of this project, and the capacity of the electrogalvanizing line will not be changed. This is a quality control project intended to address the problem of "bald spots" (non-uniform zinc coating thickness) in the electrogalvanizing line.

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

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

#### D.1.1 Particulate Matter less than 10 microns (PM-10) [326 IAC 12]

- (a) Pursuant to the Variance Decision dated April 30, 2001, PM-10 emissions from the EGL boiler shall not exceed 0.13 lbs/hr and the boiler shall burn natural gas only.
- (b) The above limit shall be valid for one year from May 18, 2002, unless the Variance Decision is extended or until revisions to rules 326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements) have been approved, whichever comes first.
- (c) The EGL-1 boiler shall be subject to the limitations under rule 326 IAC 6-1-10.1 (Lake County PM-10 Emission Requirements) when they are revised.
- (d) In the event that the PM-10 limits listed in any subsequent Variance Decision are different from those listed above, the Permittee shall apply for a permit modification within thirty (30) days of issuance of the Variance to incorporate the appropriate PM-10 limitation.

### Compliance Determination Requirements

#### D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required, compliance with the particulate matter (PM) limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

## Compliance Monitoring Requirements

### D.1.3 Monitoring

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Monitoring of these facilities is not required by this permit. However, any change or modification to these facilities as specified in 326 IAC 2-1 may require these facilities to have monitoring requirements.

## Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19] [326 IAC 12] [40 CFR 60.40(c)]

### D.1.4 Record Keeping Requirements

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- (a) Pursuant to 40 CFR 60.40c, the Permittee shall record and maintain monthly records of the amounts of fuel combusted for a period of two years following the date of such record for the one (1) 39.147 million British thermal units per hour (mmBtu/hr) natural gas fired boiler, identified as EGL-1 boiler.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

### D.1.5 Reporting Requirements

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- (a) To document compliance with condition D.1.1, the Permittee shall submit within thirty (30) days of the end of each calendar quarter, for the EGL-1 boiler the following:
  - (1) Calculated PM-10 emission rate in pounds per hour, based on a daily average.
- (b) Within thirty (30) days of the occurrence of an exceedance of the applicable limit under condition D.1.1, the Permittee shall submit a report containing the following:
  - (1) Facility identification;
  - (2) Date or time period of occurrence;
  - (3) Nature of exceedance;
  - (4) PM-10 emission rate in pounds per hour;
  - (5) Cause of exceedance; and
  - (6) Corrective action taken.
- (c) All reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

### D.1.6 Natural Gas Fired Boiler Certification

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An annual certification shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the Natural Gas Fired Boiler Certification form located at the end of this permit, or its equivalent, no later than July 1 of each year for the one (1) 39.147 million British thermal unit per hour (mmBtu/hr) natural gas fired boiler.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
and  
City of Gary  
Division of Air Pollution Control**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: U.S. Steel - Gary Works  
Source Address: One North Broadway, Gary, IN 46402  
Mailing Address: One North Broadway, Gary, IN 46402  
Source Modification No.: 089-15694-00121

**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:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 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 QUALITY  
COMPLIANCE DATA SECTION  
and  
City of Gary  
Division of Air Pollution Control**

**PART 70 OPERATING PERMIT  
ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: U.S. Steel - Gary Works  
Source Address: One North Broadway, Gary, IN 46402  
Mailing Address: One North Broadway, Gary, IN 46402  
Part 70 Source Modification No.: 089-15694-00121

9	Natural Gas Only	From: _____	To: _____
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I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
City of Gary Division of Air Pollution Control**

**Technical Support Document (TSD) for a  
Part 70 Minor Source Modification**

**Source Background and Description**

Source Name:	U.S. Steel - Gary Works
Source Location:	One North Broadway, MS-70, Indiana 46402-3199
County:	Lake
SIC Code:	3312
Operation Permit No.:	089-7663-00121
Operation Permit Issuance Date:	Not yet issued
Minor Source Modification No.:	089-15694-00121
Permit Reviewer:	ERG/MP

The Office of Air Quality (OAQ) has reviewed a modification application from U.S. Steel - Gary Works relating to the following:

This project consists of removing a fuel limit taken previously (MSM 089-14424-00121) to make Emission Offset not applicable. The limit was taken in order to keep contemporaneous NO<sub>x</sub> emissions below twenty-five tons per year. As NO<sub>x</sub> is no longer considered an ozone precursor for non attainment permitting purposes, the limit is no longer needed.

The original project consisted of upgrading the existing Electrogalvanizing Line Package Boiler (EGL-1) to increase the steam operating pressure from 100 psig to 135 psig. This was accomplished by increasing the boiler's capacity from 38.9 MMBtu/hr to 39.147 MMBtu/hr. As stated in the original MSM for this project (089-14424-00121), the upgrade consisted of the following changes to the existing boiler:

- (a) replacement of the boiler feedwater pumps to increase feedwater supply pressure;
- (b) upgrade the level control system for the water level control in the boiler drum;
- (c) upgrade the boiler drum safety relief valves; and
- (d) upgrade the steam header pressure control system.

The natural gas fuel burners and fuel supply system were not changed as part of this project, and the capacity of the electrogalvanizing line was not changed. This was a quality control project intended to address the problem of "bald spots" (non-uniform zinc coating thickness) in the electrogalvanizing line.

**History**

On May 22, 2001, U.S. Steel - Gary Works submitted an application to the OAQ requesting to modify their existing Electrogalvanizing Line Package Boiler (EGL-1). A permit for this project was issued August 2, 2001 (MSM 089-14424-00021). At the request of the source, natural gas usage was limited to 160 million cubic feet per 12-consecutive month period. On June 3, 2002, U.S. Steel-Gary Works submitted an application requesting that the natural gas usage limit be removed. Therefore, this source modification supercedes MSM 089-14424-00121.

### Existing Approvals

The EGL Boiler source has been operating under previous approvals including, but not limited to, the following:

- (a) MSM 089-14424-00121, issued on August 2, 2001.

All conditions from previous approvals were incorporated into this minor source modification, except for those relating to the natural gas usage limit. Specifically, these are Conditions D.1.1, D.1.5(b) and D.1.6(a).

### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 3, 2002.

### Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (page 1).

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source 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."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.3
PM-10	1.3
SO <sub>2</sub>	0.1
VOC	0.9
CO	14.4
NO <sub>x</sub>	17.1

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5 (d)(4)(B) as the unlimited potential to emit NOx is 17.1 tons per year. This potential to emit is the same as in the original MSM (089-14424-00121), however, that MSM was issued pursuant to 326 IAC 2-7-10.5(f)(5)(D) as the source requested a Federally enforceable limit on the amount of fuel that could be burned.

**County Attainment Status**

The source is located in Lake County.

Pollutant	Status
PM-10	moderate non-attainment
SO <sub>2</sub>	primary non-attainment
NO <sub>2</sub>	attainment or unclassifiable
Ozone	severe non-attainment
CO	attainment or unclassifiable
Lead	attainment or unclassifiable

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) The portion of Lake County in which the source is located has been classified as nonattainment for sulfur dioxide (SO<sub>2</sub>) and particulate matter with an aerodynamic diameter less than 10 microns (PM<sub>10</sub>). Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

**Source Status**

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

Pollutant	Emissions (tons/yr)
PM	238
PM-10	1,683
SO <sub>2</sub>	6,147
VOC	4,618
CO	1,023
NO <sub>x</sub>	4,334

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.
- (b) These emissions are based upon construction permit 089-12137-00121, issued on October 16, 2000.

**Potential to Emit of Modification After Issuance**

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	Potential to Emit (tons/year)					
	PM	PM10	SO <sub>2</sub>	CO	VOC	NO <sub>x</sub>
Future Potential	0.3	0.57	0.1	14.4	0.9	17.1
Past Actual	0.13	0.50	0.04	5.55	0.36	6.60
<b>Net Emissions from Project</b>	<b>0.17</b>	<b>0.07</b>	<b>0.06</b>	<b>8.85</b>	<b>0.54</b>	<b>10.5</b>
<b>PSD or Offset Threshold</b>	<b>25</b>	<b>15</b>	<b>25</b>	<b>100</b>	<b>25</b>	<b>25</b>

This modification to an existing major stationary source is not major because the net emission increase of PM, PM-10, SO<sub>2</sub>, CO, VOC and NO<sub>x</sub> are less than the Emissions Offset and Prevention of Significant Deterioration (PSD) significant levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the Emissions Offset and PSD requirements do not apply.

This modification will result in a net increase in VOC emissions of 0.54 tons per year. Therefore, VOC emissions from modifications at US Steel - Gary Works during the five-year period prior to and including 2002 were evaluated for Emission Offset applicability as follows:

Project	VOC (tons/year)
Plate Heat Treat Furnace	0.42
Batch Anneal Furnaces	0.05
Levy Modifications	0.17
RTO Sludge Dryers	0.02
Modified Oil Reclamation Plant	0.17
US Aggregates Slag Processing Facility	0.01
Repermit Boiler No. 4A	0.36
Tar Centrifuge Plant	7.03
Sinter Plant Burners/Coke Oven Battery injection jets	0.75
EGL Boiler Modifications	<del>0.072</del> <b>0.54</b>
<b>Total Emissions</b>	<b>9.52</b>

VOC emissions increases over the last 5 years are less than the de minimis levels of 25 tons per year. The net increase in emissions of all other pollutants are below the PSD significant level (100 tons per year). Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) do not apply.

**Federal Rule Applicability**

- (a) The one (1) 39.147 million British thermal units per hour (MMBtu/hr) natural gas fired boiler is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc) because its heat input capacity is greater than ten (10) million British

thermal units per hour (MMBtu/hr) but less than one hundred (100) million British thermal units per hour. The requirements for natural gas boilers consist of monthly fuel usage recordkeeping and reporting. This boiler was not subject to this NSPS prior to this modification.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - Individual Facilities**

326 IAC 6-2-4 (Particulate Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b))  
326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), does not apply to this facility as it is subject to 326 IAC 6-1 (Nonattainment Area Limitations).

Variance Decision dated April 30, 2001

The electrogalvanizing line boiler is subject to 326 IAC 6-1-10.1 (Lake county PM-10 Emission Requirements). IDEM is currently revising this rule to update the facility-specific emission limitations that would help improve the air quality of the area. Since the EGL boiler will eventually be subject to these revised emission limitations, a variance from the above mentioned state rule was requested by the Permittee and was issued by IDEM on April 30, 2001. Pursuant to this variance, the EGL boiler shall burn natural gas only and limit emissions to less than 0.13 lb/hr and 0.003 lb/MMBtu.

City of Gary Air Pollution Control Certification of Operation No. 02533

The PM-10 limits in the Certificate still apply and are included in this permit. The Certificate does not contain any other applicable requirements.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 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, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-15694-00121. This permit supersedes MSM 089-14424-00121.

**Appendix A: Emissions Calculations**

**Natural Gas Combustion Only**

**MM BTU/HR <100**

**Small Industrial Boiler**

**Company Name: US Steel**  
**Address City IN Zip: One North Broadway, Gary, Indiana 46204**  
**CP: 089-15694**  
**Pit ID: 089-00121**  
**Reviewer: ERG/MP**  
**Date: 6/10/02**

Heat Input Capacity MMBtu/hr		Potential Increase in Throughput MMCF/yr	Past Actual Throughput MMCF/yr
39.147	(after modification)	2.2	132.09
38.9	(before modification)		

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emissions of the boiler in tons/yr (at 39.147 MMBtu/hr)	0.33	1.30	0.10	17.15	0.94	14.40
Past Actual (tons/yr)	0.13	0.50	0.04	6.60	0.36	5.55
Future Potential - Past Actual (tons/yr)	0.20	0.80	0.06	10.54	0.58	8.86
Maximum Daily Increase (lbs/day)				0.58	0.03	

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

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

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

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).