



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Lori F. Kaplan
Commissioner

6015

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

Mr. David Splan
Fritz Enterprises, Inc.
1650 West Jefferson
Trenton, Michigan 48183

January 13, 2004

Re: Significant Permit Revision No:
089-17404-00465

Dear Mr. Splan:

Fritz Enterprises, Inc. was issued a FESOP (F089-14058-00465) on August 6, 2001 for an existing slag processing plant. An application to modify the source was received on June 9, 2003. IDEM, OAQ has determined that this source will be considered collocated with Ispat Inland, Inc. (Plant ID #089-00316) after this modification due to contractual control. Therefore, this source will become a Part 70 source after starting the operations included in this permit. Pursuant to 326 IAC 2-8-11.1(f)(1)(B), a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the construction and operation of a coke screening plant, including the following emission units:

- (a) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
 - (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (b) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.
- (c) Paved and unpaved roads and parking lots with public access.
- *(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons:
 - (1) One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.
- *(e) Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.

* Note: These units are considered insignificant activities as defined in 326 IAC 2-7-1(21).

The following construction conditions are applicable to the proposed project:

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

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

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 Yu-Lien Chu, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7871 to speak directly to Ms. Chu. 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, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

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

Attachments

ERG/YC

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section -
Administrative and Development - Sara Cloe
Technical Support and Modeling - Michele Boner



Joseph E. Herman
Governor

Lori F. Kaplan
Commissioner

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) and NEW SOURCE CONSTRUCTION PERMIT OFFICE OF AIR QUALITY

**Fritz Enterprises, 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 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.

Operation Permit No.: F089-14058-00465	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 6, 2001 Expiration Date: August 6, 2006
First Significant Permit Revision No.: 089-17404-00465	Pages affected: 5, 6, 17, 27 through 30



Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 13, 2004
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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 A.3, and A.4 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 2-8-3(b)]

The Permittee owns and operates a stationary iron and steel recycling process and a coke screening plant.

Authorized individual:	Vice President
Source Address:	3210 Watling, East Chicago, IN 46312
Mailing Address:	1650 W. Jefferson, Trenton, Michigan 48183
General Source Phone Number:	(734) 362-3200
SIC Code:	5093
Source Location Status:	Lake
County Status:	Nonattainment for Ozone, PM ₁₀ and SO ₂ Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Emission Offset Rules; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

Ispat Inland, Inc. is an integrated steel mill consisting of the source and several on-site contractors:

- (a) Ispat Inland, Inc., the primary operation, owns and operates a steel mill, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00316); and
- (b) Fritz Enterprises, Inc., the supporting operation, owns and operates a slag processing and coke screening plant, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00465).

IDEM has determined that Ispat Inland, Inc. and Fritz Enterprises, Inc. are considered one single source due to the contractual control after issuance of the significant permit revision #089-17404-00465. Therefore, the term "source" in the Part 70 documents refers to both Ispat Inland, Inc. and Fritz Enterprises, Inc. as one source.

A.3 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:

- (a) One (1) diesel engine, identified as emission unit 3512, with a maximum capacity of 1019 HP and venting to stack SV001.
- (b) One (1) steel and iron sizing and classifying process consisting of:
 - (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.

- (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
 - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
 - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.
 - (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.
- (c) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
- (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (d) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.

A.4 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):

- (a) Categories with emissions below insignificant thresholds:
 - (1) one diesel storage tank, with a maximum capacity of 10,000 gallons.
 - (2) One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.
- (b) Paved and unpaved roads and parking lots.
- (c) Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.

A.5 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 it is considered collocated with a Part 70 major source, as defined in 326 IAC 2-7-1(22) after issuance of Significant Permit Modification #089-17404-00465.

Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii), the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

A.6 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance,

including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [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, the applicable definitions found in the statutes or regulations (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 original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

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

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

B.5 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)] [326 IAC 2-8-5(a)(4)]

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

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish

to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

IDEM, OAQ, 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, except those specifically designated as not federally enforceable, 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.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual 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, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications 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 April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP and the PMP extension notification do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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, OAQ, 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 Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northwest Regional Office
NBD Bank Bldg.
504 N. Broadway, Ste., 418
Gary, IN 46402
1-888-209-8892

Failure to notify IDEM, OAQ, and the Northwest Regional Office, 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)]

- (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

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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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, 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, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 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 Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A 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) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

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)]. The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(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, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(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, OAQ, 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) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
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, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, 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, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 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

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 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 2-8-11.1 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 Quality
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, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (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 conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (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, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

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

- (a) Enter upon the Permittee's premises where a 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.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, and OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Source Status

The amount of scrap iron and steel processed for Ispat Inland is less than 80,000 tons per twelve (12) consecutive month period. Any increases in the amount of material processed for Ispat Inland requires prior approval from IDEM, OAQ. To document compliance with this limit, the Permittee shall maintain records of the amount of material processed each month for Ispat Inland.

C.2 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.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(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is 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 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 PM₁₀ 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, submitted to IDEM on June 13, 2001.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, 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.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

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

All required notifications shall be submitted to:

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

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) 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, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

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

C.9 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 permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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 Quality
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 protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Compliance Requirements [326 IAC 2-1.1-11]

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

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements shall be implemented when operation begins. If required by Section D the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

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

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately

ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

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

within 180 days from the date on which this source commences operation.

The ERP does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

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

C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), 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);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

(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. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (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 (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, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. 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) Reasonable response steps that may 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 reasonable 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, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment. 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.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning 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.

- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (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 not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6. This annual statement must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

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

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the

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

C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (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 makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 Quality
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, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) 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. Reporting periods are based on calendar years.

C.22 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

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) diesel engine, identified as emission unit 3512, with a maximum capacity of 1019 HP and venting to stack SV001.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.1.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.1.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.1.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.1.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

Operation Conditions

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

D.1.5 Emission Offset Minor Limit [326 IAC 2-3] [40 CFR 52.21]

The total input of diesel fuel to the diesel engine, unit 3512, shall be less than 82,595 gallons per 12 consecutive month period rolled monthly. This usage limit is required to limit the potential to emit of nitrogen oxides (NO_x) to less than 25 tons per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-3 (Emission Offset) not applicable.

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

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records of the monthly use of diesel fuel, in gallons.
- (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.1.5 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

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) steel and iron sizing and classifying process consisting of:
 - (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.
 - (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
 - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
 - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.
 - (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.

Insignificant Activities

- (b) Paved and unpaved roads and parking lots.
- (c) Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.2.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.2.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

Operation Conditions

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

D.2.5 Fugitive Particulate Matter Limitations [326 IAC 6-1-11]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the hammer mill, iron and steel drop-balling process, wash screen, conveyors, storage piles and paved and unpaved roads, and parking lots shall be limited as follows:

- (a) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (b) The opacity of fugitive particulate emissions from continuous transfer of material into and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (c) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (d) 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.
- (e) 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%).
- (f) There shall be a zero (0) percent frequency of visible emissions observed from a building enclosing all or part of the material processing equipment, except form a vent in the building.
- (g) The PM₁₀ emissions from building vents shall not exceed twenty-two thousands (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (h) The average instantaneous opacity of fugitive particulate emissions from paved and unpaved roads shall not exceed ten percent (10%).
- (i) All other facilities and operations shall meet a twenty percent (20%), three (3) minute average opacity standard.

Compliance Determination Requirements

D.2.6 Fugitive Particulate Matter Compliance [326 IAC 6-1-11.1]

- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the limits specified in Condition D.2.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP), submitted June 13, 2001 (Attachment A). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.
- (b) Compliance with the opacity limitations listed in Conditions D.2.5 (a), (b), (c), (e), (h), and (i) shall be determined using 40 CFR 60, Appendix A, Method 9.

- (c) Compliance with the opacity limitation listed in Condition D.2.5 (d) shall be determined using 40 CFR 60, Appendix A, Method 22.

- (d) Compliance with the concentration standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 5 or 17. Compliance with the opacity standard in Condition D.2.5 (g) shall be determined using 40 CFR 60, Appendix A, Method 9.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Categories with emissions below insignificant thresholds:
- (1) one diesel storage tank, with a maximum capacity of 10,000 gallons.
 - (2) One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-8-11.1, WITH CONDITIONS LISTED BELOW.

Construction Conditions

General Construction Conditions

- D.3.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
- D.3.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.3.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.
- D.3.4 The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration and Development Section, verifying that the emission units were constructed as proposed in the application.

Operation Conditions

Emission Limitations and Standards

D.3.5 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

The diesel tank has a capacity of less than 39,000 gallons. Therefore, pursuant to 326 IAC 8-9-1, the permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.6 Record Keeping Requirements

Pursuant to 326 IAC 8-9, the permittee must keep records of the following:

- (a) The vessel identification number;
- (b) The vessel dimensions; and
- (c) The vessel capacity.

Records shall be maintained for the life of the vessel.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
- (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (d) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.

(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 2-8-4(1)]

D.4.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]

In order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) not applicable, the PM and PM10 emissions from the hopper, the screen, and the conveyors shall not exceed the emission rates listed in the table below:

Emission Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Feed Hopper	0.097	0.047
Double Deck Screen	0.485	0.231
Each Conveyor Transfer Point	0.011	0.005

This is equivalent to 2.79 tons/yr of PM emissions and 1.33 tons/yr PM10 emissions. Combined with the PM and PM10 emissions from the diesel engine, the unpaved roads, and the insignificant storage piles, the emissions from the coke screening plant are limited to less than 25 tons/yr for PM and less than 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) are not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each hopper, screen, and conveyor transfer point shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.4.4 PM and PM10 Control

In order to comply with Conditions D.4.1 and D.4.2, the Permittee shall use wet suppression to control emissions of PM and PM10 from the hopper, the screen, the conveyors, and the unpaved roads at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 6-1-2. If weather conditions preclude the use of wet suppression, the Permittee shall ensure that the processed material has a moisture content greater than 5.0 percent. IDEM, OAQ may request a moisture content analysis for the processed material and the method for moisture content analysis shall be approved by IDEM, OAQ.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the hopper, the screen, and the conveyor transfer points shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or noncontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.6 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of the chemical analysis of the processed material, as needed.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain once per shift records of visible emission notations of the hopper, the screen, and the conveyor transfer points.
- (c) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) 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 QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Fritz Enterprises, Inc.
Source Address: 3210 Watling, East Chicago, Indiana, 46312
Mailing Address: 1650 Jefferson, Trenton, MI 48183
FESOP No.: F089-14058-00465

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:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (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 BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Fritz Enterprises, Inc.
Source Address: 3210 Watling, East Chicago, Indiana, 46312
Mailing Address: 1650 Jefferson, Trenton, MI 48183
FESOP No.: F089-14058-00465

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? 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:
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: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Fritz Enterprises, Inc.
Source Address: 3210 Watling, East Chicago, Indiana, 46312
Mailing Address: 1650 Jefferson, Trenton, MI 48183
FESOP No.: F089-14058-00465
Facility: Diesel Engine
Parameter: Fuel use
Limit: 82,595 gallons/12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Fritz Enterprises, Inc.
Source Address: 3210 Watling, East Chicago, Indiana, 46312
Mailing Address: 1650 Jefferson, Trenton, MI 48183
FESOP No.: F089-14058-00465

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

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

FRITZ ENTERPRISES

ISPAT Inland Facility

CONTROL PLAN FOR PARTICULATE EMISSIONS

JUNE 2001

FRITZ ENTERPRISES
ISPAT Inland Facility
CONTROL PLAN FOR PARTICULATE EMISSIONS

I. INTRODUCTION

The following control plan is designed to reduce uncontrolled fugitive dust, based on a PM₁₀ mass emission basis, from unpaved roadways (travel areas), material storage piles, processing operations, and material transfer activities.

This plan is in effect on a year-round basis to reduce uncontrolled fugitive dust. The site supervisor is responsible for implementing the control methods, as required, at the Fritz Enterprises yard.

II. FACILITY INFORMATION

Fritz Enterprises is moving its existing slag processing operation from the U.S. Steel Gary Works to the ISPAT Inland Steel facility in East Chicago, Indiana. The proposed site will cover approximately 3.9 acres within the existing ISPAT Inland facility. The following is the name and new mailing address of the facility:

Fritz Enterprises, Inc.
3210 Watling Street
East Chicago, IN 46312

Fritz is a privately held corporation. Mr. Raymond Fritz (Sr. Vice President), or his designee will provide direction and oversight regarding the execution of this control plan. All related correspondence should be mailed to Mr. Fritz at the following address:

Fritz Enterprises, Inc.
1650 West Jefferson
Trenton, MI 48183

Tele: (734) 362-3200
FAX: (734) 362-3250

III. PROCESS DESCRIPTION

The Fritz process physically separates and sizes slag and iron and is classified as SIC 5093 (Scrap and Waste Materials). The primary pieces of equipment used in the process include: a hammer mill with a 1,019 HP diesel engine, (4) drop ball cranes, (3) front-end loaders, a wash screen, and (8) material conveyors.

The process begins as metal debris is delivered to the site and is evaluated and stacked in raw material storage piles according to size and preferred end use. Items larger than 2' x 2" are processed with crane drop-balling in order to reduce the size. Depending on the material size after drop balling, the material is either transferred to the product piles,

III. PROCESS DESCRIPTION (continued)

or fed into the hammer mill for further processing. Material that is delivered at a size less than 2' x 2" is fed directly into the hammer mill from the material storage piles.

The hammer mill is a rotating cylinder that deforms and breaks-up the metal pieces. When metal is processed in this device, it is subjected to multiple impacts similar to crane drop balling, but at a much faster rate. This operation generates products in the optimum size for various uses in the steel making process (i.e. BOF, blast furnace, EAF, etc.) and allows for nearly 100% consumption. Following the hammer mill, material is processed at the wash screen and then transferred to the product piles (see the attached Process Flow Diagram).

Front-end loaders are utilized for material handling at the raw materials and product storage piles. Conveyors are utilized for in-process material transfers. The facility's total annual throughput is estimated at 180,000 tons of material processed.

IV. GENERAL FUGITIVE EMISSIONS SOURCES

Visible emissions from any paved or unpaved area shall not exceed 10-percent opacity as averaged over any consecutive 6-minute period. All visible emission observations shall be determined in accordance with 326 IAC 6-1-11(d).

Paved Roads and Parking Lots

The roads leading to the Fritz yard are paved and maintained by ISPAT Inland Steel. Fugitive dust from paved roads and parking lots is controlled by flushing with water. Flushing is performed, on an as needed basis, to maintain fugitive particulate emissions below the acceptable opacity specified by 326 IAC 6-1-11, subsection (e)(3)(F).

Unpaved Roads and Traffic Areas

The Fritz yard is not paved and therefore requires the periodic use of a chemical dust suppressant to ensure that the average instantaneous opacity of fugitive particulate emissions does not exceed 10%, pursuant to 326 IAC 6-1-11, subsection (e)(8). As required, the area is treated with Penta Seal (an asphaltic emulsion) to control the particulate emissions associated with car and equipment traffic in the yard.

Treatment of unpaved areas is delayed when:

- 0.1 or more inches of rain have accumulated during the 24-hour period prior to the scheduled treatment, or
- Unpaved areas are saturated with water such that chemical dust suppressants cannot be accepted by the surface, or
- Unpaved areas are frozen or covered by ice, snow, or standing water, or
- The area is closed or abandoned, or
- It is raining at the time of the scheduled treatment.

V. SPECIFIC FUGITIVE EMISSION SOURCES

The following is a list of the process operations that may result in the generation of particulate emissions:

- Material handling activities at the raw materials storage piles,
- Crane drop-balling to reduce material size,
- Hammer mill operations to reduce material size,
- Operation of the diesel engine to drive the hammer mill,
- Wash screen operations,
- Material transfer on the conveyors,
- Material handling activities at the product storage piles, and

Refer to the Air Quality permit application, submitted on March 7, 2001, for a more detailed description of the process emission sources and calculations of the potential facility emissions.

VI. CONTROL MEASURES

The diesel drive for the hammer mill is not a significant source of fugitive particulate emissions. As such, the only applicable control measure will be to limit the unit operation to 1,600 hours per year. With regard to the remaining process operations, wet dust suppression will be used as the primary control measure. As required, Fritz personnel will implement wet dust suppression by using a water cannon at the material storage piles, drop-balling area, hammer mill, and wash screen.

The site supervisor will determine the applicability of control measures on a day-to-day basis, primarily dependent on weather conditions. As required, dust suppression will be implemented in the morning, prior to beginning process operations. Fritz personnel will also be instructed to remain aware of potential changes throughout the day (i.e. drying, wind) that may require application, or reapplication of dust suppression.

VII. SCHEDULE

This Control Plan will go into effect on the first day of operation at the new Fritz facility. Any modification of this Control Plan, as warranted by process changes, will require submission to the controlling authority for approval prior to implementation.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Fritz Enterprises, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake
SIC Code:	5093, 5052
Operation Permit No.:	089-14058-00465
Operation Permit Issuance Date:	August 6, 2001
Significant Permit Revision No.:	089-17404-00465
Permit Reviewer:	ERG/YC

On November 26, 2003, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville, Indiana, and the Times in Munster, Indiana, stating that Fritz Enterprises, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) to construct and operate a coke screening plant. The notice also stated that OAQ proposed to issue a permit for this operation 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 December 23, 2003, Fritz Enterprises, Inc. submitted comments on the proposed Significant Permit Revision. The summary of the comments is as follows. Bold text has been added while text with a line through it has been deleted. The Table of Contents was updated as needed.

Comment 1:

The source requested that the language relating to performing the chemical analysis while weather conditions preclude the use of wet suppression in Condition D.4.4 be removed. The source stated that there is no chemical analytical equipment on site to test the moisture content of the material processed and the results from the outside laboratory could be questionable.

Response to Comment 1:

The moisture content test is only required by IDEM, OAQ when a non-compliance situation is suspected. The Permittee shall ensure that the processed material has a moisture content greater than 5.0 percent. For clarification purposes, Condition D.4.4 has been revised as follows as the result of this comment:

D.4.4 PM and PM10 Control

In order to comply with Conditions D.4.1 and D.4.2, the Permittee shall use wet suppression to control emissions of PM and PM10 from the hopper, the screen, the conveyors, and the unpaved roads at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 6-1-2. If weather conditions preclude the use of wet suppression, the Permittee shall ~~perform chemical analysis on the processed material to ensure~~ **that the processed material** it has a moisture content greater than 5.0 percent. **IDEM, OAQ may request a moisture content analysis for the processed material and t**The method for moisture content analysis shall be approved by IDEM, OAQ.

Upon further review, IDEM, OAQ has made the following revisions to Condition D.4.5:

D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the hopper, the screen, and the conveyor transfer points shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or ~~discontinuous~~ **noncontinuous** operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Fritz Enterprises, Inc.
Source Location:	3210 Watling Street, East Chicago, Indiana 46312
County:	Lake
SIC Code:	5093, 5052
Operation Permit No.:	089-14058-00465
Operation Permit Issuance Date:	August 6, 2001
Significant Permit Revision No.:	089-17404-00465
Permit Reviewer:	ERG/YC

The Office of Air Quality (OAQ) has reviewed a modification application from Fritz Enterprises, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
 - (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (b) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.
- (c) Paved and unpaved roads and parking lots with public access.
- *(d) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons:
 - (1) One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.
- *(e) Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.

* Note: These units are considered insignificant activities as defined in 326 IAC 2-7-1(21).

History

Fritz Enterprises, Inc. (referred to as "Fritz") is an existing slag processing plant and is located at the same location as Ispat Inland, Inc. (referred to as "Ispat"), a steel mill. Fritz was issued a FESOP (F089-14058-00465) on August 6, 2001 and was determined to not be collocated with Ispat during the review of this FESOP because less than 50% of the Fritz's business was with Ispat.

On June 9, 2003, Fritz submitted an application to the OAQ requesting an additional coke screening plant and associated operations be added at this location. The new coke screening plant will process coke received either from Ispat, or Ispat's contractors. IDEM, OAQ has determined that Fritz will be considered collocated with Ispat after this modification due to contractual control. Since Fritz and Ispat will be considered one (1) single source for Part 70 review purposes and Ispat is an existing Part 70 and PSD major source, Fritz shall submit a Part 70 permit application within twelve (12) months after starting the operations of this new coke screening plant, pursuant to 326 IAC 2-7-4(a)(1)(A)(ii).

Source Definition

Ispat Inland, Inc. is an integrated steel mill consisting of the source and several on-site contractors:

- (a) Ispat Inland, Inc., the primary operation, owns and operates a steel mill, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00316); and
- (b) Fritz Enterprises, Inc., the supporting operation, owns and operates a slag processing and coke screening plant, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00465).

IDEM has determined that Ispat Inland, Inc. and Fritz Enterprises, Inc. are one source under 326 IAC 2-7. These two plants are located in the same property and are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both Ispat Inland, Inc. and Fritz Enterprises, Inc. as one source.

Separate Part 70 permits will be issued to Ispat Inland, Inc. and Fritz Enterprises, Inc. solely for administrative purpose.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant 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 9, 2003. Additional information was received on October 6, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 5).

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	251
PM-10	75.3
SO ₂	1.20
VOC	1.45
CO	3.92
NO _x	18.2

Justification for Modification

This revision is being performed as a significant permit revision pursuant to 326 IAC 2-8-11.1(f)(1)(B) as the this modification results in the source needing to obtain a Part 70 permit under 326 IAC 2-7.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment*
SO ₂	Primary Nonattainment
NO ₂	Attainment
Ozone	Severe Nonattainment
CO	Attainment
Lead	Attainment

*Note: Lake County has been federally redesignated in 40 CFR 81.315 as attainment and the Air Pollution Control Board will be making the same redesignation in the state rules.

- (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) Lake County has been designated as nonattainment for PM10 and SO₂. Therefore, PM10 and SO₂ emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment for all other 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 in one of the 28 listed source categories under 326 IAC 2-2 and 326 IAC 2-3, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability.

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/year)
PM	0.6
PM-10	0.6
SO ₂	1.4
VOC	0.6
CO	4.9
NO _x	25

- (a) This existing source is not an Emission Offset major stationary source because the potential to emit PM10 and SO₂ is less than 100 tons/yr and potential to emit VOC is less than 25 tons/yr. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (b) This existing source is not a PSD major stationary source because no attainment pollutant (PM, CO, and NO_x) is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (c) These emissions are the potential to emit from Fritz Enterprises, Inc. only, based upon the Technical Support Document (TSD) for FESOP #089-14058-00465, issued on August 6, 2001.
- (d) This existing source (Fritz Enterprises, Inc.) will be considered collocated with Ispat Inland, Inc. (Plant ID #089-00316) after issuance of this significant permit revision. Ispat Inland, Inc. is an existing PSD and Emission Offset major source and is in one of the 28 listed source categories. Therefore, Fritz Enterprises, Inc. will be considered an PSD and Emission Offset major source after issuance of this permit revision.

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.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coke Screening Plant	Less than 2.79	Less than 1.33	-	-	-	-	-

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Diesel Engine	1.29	1.29	1.20	1.45	3.92	18.2	Negligible
*Unpaved Roads (fugitive)	Less than 16.6	Less than 3.42	-	-	-	-	-
*Storage Piles (fugitive)	0.23	0.11	-	-	-	-	-
Diesel Storage Tank (insignificant)	-	-	-	Less than 1.0	-	-	Negligible
Total PTE of the Modification	Less than 20.9	Less than 6.15	1.20	Less than 2.45	3.92	18.2	Negligible
**PSD and Emission Offset Thresholds	25	15	40	25	100	40	NA

Note: ()Since Ispat Inland, Inc. is in one of the 28 source categories under 326 IAC 2-2 and 326 IAC 2-3, the fugitive particulate matter emissions from the unpaved roads and the storage piles are counted towards determination of PSD and Emission Offset applicability.

(**)This source will be considered an PSD and Emission Offset major source after issuance of this permit revision.

- (a) This modification is not major because the emission increase is less than the PSD and Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.
- (b) The PM and PM10 emissions from the this modification are each limited to less than 20.9 tons/yr and 6.15 tons/yr, respectively. This is attained by the use of wet suppression to control the emissions from the new coke screening plant and the unpaved roads.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this portable source.
- (b) This screening plant processes coke only. Coke does not meet the definition of “nonmetallic mineral” in 40 CFR 60.671. Therefore, the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants (40 CFR 60.670-676, Subpart OOO) are not applicable to this modification.
- (c) The diesel fuel storage tank has a capacity less than 75 cubic meters (19,813 gallons). Therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984 (40 CFR 60.110b - 117b, Subpart Kb) are not applicable to this tank.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.
- (e) This modification does not involve a pollutant-specific emissions unit:
 - (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and

- (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to the units included in this modification.

State Rule Applicability - Entire Source

326 IAC 2-4.1 (New Sources of Hazardous Air Pollutants)

The potential to emit HAPs from this modification is less than the HAP major source thresholds. Therefore, the requirements of 326 IAC 2-4.1 are not applicable.

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 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 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

The source is located in Lake County and has the potential to emit fugitive particulate matter greater than five (5) tons per year. Therefore, this source is subject to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements). Pursuant to 326 IAC 6-1-11.1, 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 percent (0%) 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 percent (0%) 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 PM₁₀ 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, submitted on June 9, 2003. This plan indicates that the fugitive emissions will be controlled by spraying the unpaved roads and emission units with water on an as-needed basis.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

The source is currently located in Lake County and the potential to emit PM10 is greater than 10 tons/yr. Therefore, this source is subject to the requirements of 326 IAC 6-1-11.2.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4, the source shall not generate fugitive dust to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is located in Lake County and has received all the necessary preconstruction approvals. Therefore, the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) are not applicable.

State Rule Applicability - The Coke Screening Plant

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

This source will be considered collocated with Ispat Inland, Inc., which is in 1 of the 28 source categories defined in 326 IAC 2-2-1(p)(1) and is an existing PSD major and Emission Offset Major source. In order to be considered a minor modification, the PM and PM10 emissions from the hopper, the screen, and the conveyor transfer points of this coke screening plant shall not exceed the emission rates listed in the table below:

Emission Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Feed Hopper	0.097	0.047
Double Deck Screen	0.485	0.231
Each Conveyor Transfer Point	0.011	0.005

This is equivalent to 2.79 tons/yr of PM emissions and 1.33 tons/yr PM10 emissions. Combined with the PM and PM10 emissions from the diesel engine, the unpaved roads, and the insignificant storage piles, the emissions from this modification are limited to less than 25 tons/yr for PM and less than 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) are not applicable. The use of water suppression ensures compliance with the limits above.

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

The equipment at this coke screening plant is not specifically listed in rule 326 IAC 6-1-8.1 through 326 IAC 6-1-18. The potential to emit PM before control from the entire source, including this new coke screening plant and the existing slag processing plant, is greater than 100 tons/yr. Therefore, this portable coke screening plant will be subject to 326 IAC 6-1-2 and shall comply with the PM emission limit of 0.03 grain per dry standard cubic foot.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Since the operations at this coke screening plant are subject to the requirements of 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), these operations are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(b)(1).

State Rule Applicability - Diesel Engine

326 IAC 7-1.1-2 (Sulfur Dioxide (SO₂) Emission Limitations)

The potential to emit SO₂ from the proposed diesel engines is less than 25 tons/yr. Therefore, the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide (SO₂) Emission Limitations) are not applicable to this engine.

326 IAC 8-1-6 (New Facilities; General Reduction Requirement)

The potential VOC emissions from the diesel engine is less than twenty five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties)

This source is not located in Clark or Floyd Counties. Therefore, the requirements of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) are not applicable.

State Rule Applicability - Diesel Storage Tank (Insignificant)

326 8-4-3 (Petroleum Liquid Storage Facilities)

The diesel fuel storage tank has a capacity less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 are not applicable to this tank.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This source is located in Lake County, therefore, the diesel fuel storage tank at this source is subject to 326 IAC 8-9. Since this tank has a capacity less than 39,000 gallons, this tank is subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and (b), which have the following requirements:

- (a) The owner or operator of each vessel shall maintain records for the life of the vessel for the following information:
 - (1) The vessel identification number.
 - (2) The vessel dimensions.
 - (3) The vessel capacity.
 - (4) A description of the emission control equipment for each vessel described in 326 IAC 8-9-4 (a) and 4 (b), applicable, or a schedule for installation of emission control equipment on vessels described in 326 IAC 8-9-4(a) and 4 (b), if applicable, with a certification that the emission control equipment meets the applicable standards.
- (b) A report containing the information described in (a) shall be submitted to IDEM, OAQ.

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.

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

1. The hopper, the screen, and the conveyors of the new coke screening plant have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the exhausts from the hopper, the screen, and the conveyor transfer points shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the hopper, the screen, and the conveyors of the new coke screening plant must operate properly to ensure compliance with 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 6-1-2 (Nonattainment Area Limitations).

Proposed Changes

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3, and A.4 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 2-8-3(b)]

The Permittee owns and operates a stationary iron and steel recycling process **and a coke screening plant.**

Authorized individual:	David Splan Vice President
Source Address:	3210 Watling, East Chicago, IN 46312
Mailing Address:	1650 W. Jefferson, Trenton, Michigan 48183
General Source Phone Number:	(734) 362-3200
SIC Code:	5093
Source Location Status:	Lake
County Status:	Nonattainment for Ozone, PM ₁₀ and SO ₂ Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Part 70 Permit Program Minor Major Source, under PSD Emission Offset Rules; Minor Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]

Ispat Inland, Inc. is an integrated steel mill consisting of the source and several on-site contractors:

- (a) Ispat Inland, Inc., the primary operation, owns and operates a steel mill, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00316); and
- (b) Fritz Enterprises, Inc., the supporting operation, owns and operates a slag processing and coke screening plant, located at 3210 Watling Street, East Chicago, Indiana 46312 (Plant ID # 089-00465).

IDEM has determined that Ispat Inland, Inc. and Fritz Enterprises, Inc. are considered one single source due to the contractual control after issuance of the significant permit revision #089-17404-00465. Therefore, the term "source" in the Part 70 documents refers to both Ispat Inland, Inc. and Fritz Enterprises, Inc. as one source.

A.23 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

...

- (c) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
 - (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (d) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.

A.34 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):

- (a) Categories with emissions below insignificant thresholds:

- (1) one diesel storage tank, with a maximum capacity of 10,000 gallons.
- (2) **One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.**
- (b) Paved and unpaved roads and parking lots.
- (c) **Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.**

~~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 Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP):~~

A.5 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 it is considered collocated with a Part 70 major source, as defined in 326 IAC 2-7-1(22) after issuance of Significant Permit Modification #089-17404-00465.

Pursuant to 326 IAC 2-7-4(a)(1)(A)(ii), the Permittee shall apply for a Title V operating permit within twelve (12) months of the date on which the source first meets an applicability criterion of 326 IAC 2-7-2.

~~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 nitrogen oxides (NO_x) and volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);~~

~~(2) The potential to emit PM₁₀, PM, SO₂, and CO from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;~~

~~(3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and~~

~~(4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.~~

~~(b) Pursuant to 326 IAC 2-3 (Emission Offset), emissions of particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.~~

~~(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). 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.21 Source Status

~~For this source to maintain its status as a separate source from Ispat Inland, the Permittee shall limit the amount of scrap iron and steel processed for Ispat Inland to no more than 80,000 tons per twelve (12) consecutive month period. Any increases in the amount of material processed for Ispat Inland requires prior approval from IDEM, OAQ. To document compliance with this limit, the Permittee shall maintain records of the amount of material processed each month for Ispat Inland.~~ **is less**

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (b) One (1) steel and iron sizing and classifying process consisting of:
 - (1) One (1) Hammer Mill with a maximum capacity of 75 tons per hour and venting to the atmosphere.
 - (2) One (1) iron and steel drop-balling process, with a maximum capacity of 112.5 tons per hour and venting to the atmosphere.
 - (3) One (1) Wash Screen with a maximum capacity of 75 tons per hour and venting to the atmosphere.
 - (4) Eight (8) conveyors with a maximum throughput of 112.5 tons per hour.
 - (5) Three (3) storage piles, identified as the feed storage pile, the non-magnetic material storage pile, and the magnetic material storage pile, each with a maximum capacity of 1000 tons and venting to the atmosphere.

Insignificant Activities

- (b) Paved and unpaved roads and parking lots.
- (c) **Three (3) storage piles, with a total maximum throughput of 110 tons of coke per hour.**

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

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Categories with emissions below insignificant thresholds:
 - (1) one diesel storage tanks, with a maximum capacity of 10,000 gallons.
 - (2) **One (1) diesel fuel storage tank, constructed in 2003, with a maximum capacity of 1,000 gallons.**

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

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) coke screening operation, constructed in 2003, with a maximum capacity of 110 tons of coke per hour, consisting of the following:
- (1) One (1) feed hopper.
 - (2) One (1) double deck screen.
 - (3) Five (5) conveyors.
- (d) One (1) diesel engine, constructed in 2003, with a maximum capacity of 134 hp, and exhausting to stack SV001.

(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 2-8-4(1)]

D.4.1 PSD and Emission Offset Minor Limits [326 IAC 2-2] [326 IAC 2-3]

In order to make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) not applicable, the PM and PM10 emissions from the hopper, the screen, and the conveyors shall not exceed the emission rates listed in the table below:

Emission Units	PM Emission Limit (lbs/hr)	PM10 Emission Limit (lbs/hr)
Feed Hopper	0.097	0.047
Double Deck Screen	0.485	0.231
Each Conveyor Transfer Point	0.011	0.005

This is equivalent to 2.79 tons/yr of PM emissions and 1.33 tons/yr PM10 emissions. Combined with the PM and PM10 emissions from the diesel engine, the unpaved roads, and the insignificant storage piles, the emissions from the coke screening plant are limited to less than 25 tons/yr for PM and less than 15 tons/yr for PM10. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) are not applicable.

D.4.2 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from each hopper, screen, and conveyor transfer point shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.4.4 PM and PM10 Control

In order to comply with Conditions D.4.1 and D.4.2, the Permittee shall use wet suppression to control emissions of PM and PM10 from the hopper, the screen, the conveyors, and the unpaved roads at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 2-2, 326 IAC 2-3, and 326 IAC 6-1-2. If weather conditions preclude the use of wet suppression, the Permittee shall perform chemical analysis on the processed material to ensure it has a moisture content greater than 5.0 percent. The method for moisture content analysis shall be approved by IDEM, OAQ.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.5 Visible Emissions Notations

- (a) Visible emission notations of the exhausts from the hopper, the screen, and the conveyor transfer points shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.4.6 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of the chemical analysis of the processed material, as needed.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain once per shift records of visible emission notations of the hopper, the screen, and the conveyor transfer points.
- (c) To document compliance with Condition D.4.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Significant Permit Revision No. 089-17404-00465.

**Appendix A: Emission Calculations
PM10 Emissions
From the Coke Screening Plant**

**Company Name: Fritz Enterprises, Inc.
Address: 3210 Watling Street, East Chicago, IN 46312
SPR #: 089-17404-00465
Reviewer: ERG/YC
Date: November 4, 2003**

Maximum Throughput Rate:

110 (tons/hr)

Process	Number of Units	Uncontrolled PM10 Emission Factor (lbs/ton)	PTE of PM10 before Control (lbs/hr/unit)	PTE of PM10 before Control (tons/yr)	Controlled PM10 Emission Factor (lbs/ton)	PTE of PM10 after Control (lbs/hr/unit)	PTE of PM10 after Control (tons/yr)
*Hopper	1	0.0043	0.473	2.07	0.000430	0.047	0.21
** Double-Deck Screen	1	0.0710	7.810	34.2	0.002100	0.231	1.01
**Conveyor Transfer Points	5	0.0014	0.154	3.37	0.000048	0.005	0.12
Total				39.7			1.33

* The uncontrolled emission factor for the hopper is the one for low silt batch drop from iron and steel mill in AP-42, Table 12.5.4 (10/86). The controlled emission factor is calculated assuming 90% control by wet suppression.

** The uncontrolled and controlled emission factors for the conveyor transfer point and screen are from AP-42, Chapter 11.19, Table 11.19.2-2 - crushed stone processing operations (AP-42 01/95). The controlled emission factors reflect water suppression.

Methodology

PTE before Control (lbs/hr/unit) = Maximum Throughput (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

PTE before Control (tons/yr) = PTE before Control (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

PTE after Control (lbs/hr/unit) = Maximum Throughput (tons/hr) x Controlled Emission Factor (lb/ton)

PTE after Control (tons/yr) = PTE after Control (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
PM Emissions
From the Coke Screening Plant**

**Company Name: Fritz Enterprises, Inc.
Address: 3210 Watling Street, East Chicago, IN 46312
SPR #: 089-17404-00465
Reviewer: ERG/YC
Date: November 4, 2003**

Maximum Throughput Rate:

110 (tons/hr)

Process	Number of Units	Uncontrolled PM Emission Factor (lbs/ton)	PTE of PM before Control (lbs/hr/unit)	PTE of PM before Control (tons/yr)	Controlled PM Emission Factor (lbs/ton)	PTE of PM after Control (lbs/hr/unit)	PTE of PM after Control (tons/yr)
*Hooper	1	0.0088	0.968	4.24	0.000880	0.097	0.42
** Double-Deck Screen	1	0.1491	16.401	71.8	0.004410	0.485	2.12
**Conveyor Transfer Points	5	0.00294	0.323	7.08	0.000101	0.011	0.24
Total				83.2			2.79

* The uncontrolled emission factor for the hopper is the one for low silt batch drop from iron and steel mill in AP-42, Table 12.5.4 (10/86). The controlled emission factor is calculated assuming 90% control by wet suppression.

** The uncontrolled and controlled emission factors for the conveyor transfer point and the screen are from AP-42, Chapter 11.19, Table 11.19.2-2 - Crushed stone processing operations (AP-42 01/95). The controlled emission factors reflect water suppression. Assume all TSP emissions equal to PM emissions and the TSP emission factors can be estimated by multiplying PM10 emission factors by 2.1.

Methodology

PTE before Control (lbs/hr/unit) = Maximum Throughput (tons/hr) x Uncontrolled Emission Factor (lbs/ton)

PTE before Control (tons/yr) = PTE before Control (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

PTE after Control (lbs/hr/unit) = Maximum Throughput (tons/hr) x Controlled Emission Factor (lb/ton)

PTE after Control (tons/yr) = PTE after Control (lbs/hr/unit) x Number of Units x 8760 hr/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Internal Combustion Engines**

From the 134 HP Diesel Engine

**Company Name: Fritz Enterprises, Inc.
Address: 3210 Watling Street, East Chicago, IN 46312
SPR #: 089-17404-00465
Reviewer: ERG/YC
Date: November 4, 2003**

Max. Power Output

Horse Power

134.0

Emission Factor in lb/HP-hr	Pollutant					
	PM*	PM10*	SO ₂	NO _x	**VOC	CO
	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.47E-03	6.68E-03
Potential Emission in tons/yr	1.29	1.29	1.20	18.2	1.45	3.92

*Assume PM10 emissions are equal to PM emissions.

** Assume TOC (total organic compounds) emissions are equal to VOC emissions.

Emission Factors from AP-42, Chapter 3.3, Table 3.3-1, SCC #2-02-001-02 and 2-03-001-01.(AP-42 Supplement B 10/96)

Methodology

Emission (tons/yr) = Power Output (HP) x Emission Factor (lb/HP-hr) x 8760 hr/yr x 1 tons/2000 lbs

Appendix A: Emission Calculations
Fugitive Emissions
From the Unpaved Roads (Fugitive Emissions)

Company Name: Fritz Enterprises, Inc.
Address: 3210 Watling Street, East Chicago, IN 46312
SPR #: 089-17404-00465
Reviewer: ERG/YC
Date: November 4, 2003

1. Emission Factors:

According to AP42, Chapter 13.2.2 - Unpaved Roads, the PM/PM emission factors from the unpaved roads can be estimated from the following equation:

$$E = \frac{k \times (s/12)^a \times (w/3)^b}{(M/0.2)^c}$$

where:

E = emission factor (lb/vehicle mile traveled)	
s = surface material silt content (%) =	4.9 %
w = mean vehicle weight (tons)	
M = surface material moisture content (%) =	0.2 %
k = empirical constants =	10 for PM and 2.6 for PM10
a = empirical constant =	0.8
b = empirical constants =	0.5 for PM and 0.4 for PM10
c = empirical constants =	0.4 for PM and 0.3 for PM10

2. Potential Emissions from the Unpaved Roads:

Mean Vehicle weight (W) = 30.5 tons
 Annual Traveled Mileage = 32 trips/hr x 400 ft/trip x 0.00019 mile/ft x 8760 hr/yr = 21,304 miles/yr

$$\text{PM Emission Factor} = \frac{10 \times (4.9/12)^{0.8} \times (30.5/3)^{0.5}}{(0.2/0.2)^{0.4}} = 15.6 \text{ lbs/mile}$$

$$\text{PM10 Emission Factor} = \frac{2.6 \times (4.9/12)^{0.8} \times (30.5/3)^{0.4}}{(0.2/0.2)^{0.3}} = 3.21 \text{ lbs/mile}$$

Potential PM Emissions = 21,304 mile/yr x 15.6 lbs/mile x 1 ton/2000 lbs = **166 tons/yr**
Potential PM10 Emissions = 21,304 mile/yr x 3.21 lbs/mile x 1 ton/2000 lbs = **34.2 tons/yr**

3. Potential to Emit (PTE) of PM/PM10 After Control from Unpaved Roads:

The source also proposed to use wet suppression to control fugitive dust emissions.
 The control efficiency from wet suppression is 90% when the moisture content is greater than 5%.

PTE of PM after Control = 21,304 mile/yr x 15.6 lbs/mile x 1 ton/2000 lbs x (1-90%) = **16.6 tons/yr**
 PTE of PM10 after Control = 21,304 mile/yr x 3.21 lbs/mile x 1 ton/2000 lbs x (1-90%) = **3.42 tons/yr**

**Appendix A: Emission Calculations
Potential PM and PM10 Emissions
From the Storage Piles (Fugitive Emissions)**

**Company Name: Fritz Enterprises, Inc.
Address: 3210 Watling Street, East Chicago, IN 46312
SPR #: 089-17404-00465
Reviewer: ERG/YC
Date: November 4, 2003**

1. Emission Factors:

According to AP42, Chapter 13.2.4 - Aggregate Handling and Storage Piles, the PM/PM10 emission factors for aggregate handling process can be estimated from the following equation:

$$E_f = \frac{.0032 \times (U/5)^{1.3} \times k}{(M/2)^{1.4}}$$

where:

E _f = Emission Factor (lbs/ton)	
k = Particle size multiplier =	0.74 for PM and 0.35 for PM10
U = Mean wind speed (mph) =	10 mph (provided by the source)
M = Moisture content (%) =	12 % (provided by the source)

Therefore,

PM Emission Factor =	0.0005 lbs/ton process
PM10 Emission Factor =	0.0002 lbs/ton process

2. Potential to Emit PM/PM10 before Control:

Throughput Rate:	110 tons/hr	(3 piles total)	
Potential PM =	110 ton/hr x 0.0005 lbs/ton x 8760 hr/yr x 1 tons/2000 lbs =		0.23 tons/yr
Potential PM10 =	110 ton/hr x 0.0002 lbs/ton x 8760 hr/yr x 1 tons/2000 lbs =		0.11 tons/yr