



Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant  
DATE: May 3, 2005  
RE: Olympic Mill Services-a Division of Tube City, LLC / SSM 127-20430-00104  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels, Jr.  
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 Commissioner

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May 3, 2005

Mr. Michael J. Connolly  
 Director Environmental Engineering  
 Olympic Mill Services - a Division of Tube City, LLC.  
 1155 Business Center Drive, Suite 200  
 Horsham, PA 19044-3454

Re: **127-20430-00104**  
 Significant Source Modification

Dear Mr. Connolly:

On December 2, 2004, the Office of Air Quality (OAQ) received an application from Olympic Mill Services to construct a slag processing plant to be located at 6500 US Highway 12, Portage IN 46368.

Part 70 Source Definition

Pursuant to 326 IAC 2-7-1(22), 326 IAC 2-7-2 and in accordance with the IDEM Non Rule Policy (AIR-006 NPD September 24, 1996), Beta Steel Corporation and Olympic Mill Services are considered as one source.

Company Name	Location	Plant ID
Beta Steel Corp.	6500 S. Boundary Road, Portage, IN 46368	127-00036
Olympic Mill Services	6500 US Highway 12, Portage IN 46368	127-00104

For administrative purposes, separate plant identifications and permits are issued to Beta Steel Corp. and Olympic Mill Services.



## Emission Units

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

A slag processing plant, with a maximum feed rate of 200 tons of slag per hour, consisting of:

- |                              |  |
|------------------------------|--|
| (a) feeders,                 | (b) screens,                               |
| (c) conveyors,               | (d) crushers,                              |
| (e) pulleys,                 | (f) load in and load out batch operations, |
| (g) storage piles,           | (h) transfer points,                       |
| (i) scrap lancing operation, | (j) ball drop operations, and              |
| (k) unpaved roads.           |  |

Particulate matter emissions are controlled by a wet suppression system.

## General Construction Conditions

The following construction conditions are applicable to the proposed operations:

- (1) The data and information supplied with the application shall be considered part of this source modification approval.
- (2) 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).
- (3) 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 IC 13-20; IC 13-22 through IC 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.
- (4) 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.
- (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.
- (6) Pursuant to 326 IAC 2-7-10.5(l), the operations constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

### Approval to Construct

- (1) This significant source modification (SSM 127-20430-00104) authorizes the construction of the new operations.
- (2) Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.
- (3) Operation is not approved until the Part 70 Operating Permit (127-20488-00104) has been issued.

### Effective Date of the Approval

- (1) Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
- (2) Pursuant to 326 IAC 2-7-10.5(i), construction must commenced within eighteen (18) months of the issuance of this modification approval.
- (3) This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

### IDEM Contact

If you have any questions regarding this permit modification please contact Ms. Iryn Calilung of my staff at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

Sincerely,

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

Attachment - Technical Support Document  
- Technical Support Document Addendum

cc: File - Porter County  
Porter County Health Department  
NWRO  
Air Compliance Inspector - MJH  
Compliance Data Section  
Beta Steel Corporation



Mitchell E. Daniels, Jr.  
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## SIGNIFICANT SOURCE MODIFICATION

### OFFICE OF AIR QUALITY

**Olympic Mill Services - a Division of Tube City, LLC.**  
**- a contractor of Beta Steel Corp.**  
**6500 US Highway 12**  
**Portage IN 46368**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in the Emergency Provisions.

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

Significant Source Modification: <b>SSM 127-20430-00104</b>	
Issued by: Original signed by  Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date: May 3, 2005

<b>SECTION A</b>	<b>SOURCE SUMMARY</b>
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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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]**

The Permittee owns and operates a stationary slag processing plant.

Responsible Official: [Director of Environmental Engineering](#)  
Source Location: 6500 US Highway 12, Portage IN 46368  
Mailing Address: [1155 Business Center Drive, Suite 200](#)  
[Horsham, PA 19044-3454](#)  
General Source Phone Number: [215-956-5618](#)  
County: Porter  
SIC Code: [7389](#)  
Source Location Status: Nonattainment for 1-hour ozone standard  
Nonattainment for 8-hour ozone standard  
[Nonattainment for PM2.5](#)  
Source Status: Attainment for all other criteria pollutants  
Major Source under PSD and Emission Offset Rules  
Part 70 Source  
Major Source, Section 112 of the Clean Air Act  
1 of 28 Listed Source Categories

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

Pursuant to 326 IAC 2-7-1(22), 326 IAC 2-7-2 and in accordance with the IDEM Non Rule Policy (AIR-006 NPD September 24, 1996), Beta Steel Corporation and Olympic Mill Services are considered as one source.

Company Name	Location	Plant ID
Beta Steel Corp.	6500 S. Boundary Road, Portage, IN 46368	127-00036
Olympic Mill Services	6500 US Highway 12, Portage IN 46368	127-00104

For administrative purposes, separate plant identifications and permits are issued to Beta Steel Corporation and Olympic Mill Services.

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

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

A slag processing plant, with a maximum feed rate of 200 tons of slag per hour, consisting of:

- (a) feeders,
- (b) screens,
- (c) conveyors,
- (d) crushers,
- (e) pulleys,
- (f) load in and load out batch operations,
- (g) storage piles,
- (h) transfer points,
- (i) scrap lancing operation,
- (j) ball drop operations, and
- (k) unpaved roads.

Particulate matter emissions are controlled by a wet suppression system.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

## SECTION D.1 FACILITY OPERATION CONDITIONS

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

A slag processing plant, with a maximum feed rate of 200 tons of slag per hour, consisting of:

- (a) feeders,
- (b) screens,
- (c) conveyors,
- (d) crushers,
- (e) pulleys,
- (f) load in and load out batch operations,
- (g) storage piles,
- (h) transfer points,
- (i) scrap lancing operation,
- (j) ball drop operations, and
- (k) unpaved roads.

Particulate matter emissions are controlled by a wet suppression system.

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

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

#### D.1.1 Particulate [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emission rate from the slag processing operations shall not exceed 58.51 pounds per hour, as determined by the following equation:

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and}$$

P = process weight rate in tons per hour.  
P = 200 tons per hour

- (b) Pursuant to 326 IAC 6-3-2(e)(3), when the process weight rate exceeds two hundred (200) tons per hour, the allowable emission may exceed the pounds per hour limitation calculated using the above equation, provided the concentration of particulate in the discharge gases to the atmosphere is less than 0.10 pounds per one thousand (1,000) pounds of gases.

#### D.1.2 PSD Minor Limitations [326 IAC 2-2] [326 IAC 2-3]

- (a) The annual slag processed shall be less than 1,752,000 tons of slag per 12-consecutive month period, with compliance determined at the end of each month.

This slag limitation is equivalent to less than 25 tons per year and 15 tons per year of PM and PM10 respectively.

- (b) During the first twelve (12) months of operation, the slag processed shall be limited such that the total production divided by the accumulated months of operation shall be less than 146,000 tons per month.

Compliance with these limitations makes 326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-3 Emission Offset not applicable.

#### D.1.3 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), the fugitive particulate matter emissions shall be controlled according to the fugitive dust control plan attached to the Part 70 Operating Permit (127-9691-00036), issued on August 12, 2004 to Beta Steel Corp.

This plan is also included as an attachment to this permit.

#### D.1.4 Preventive Maintenance Plan (PMP) [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan (PMP), of this permit, is required for these facilities and their emission control devices.

### **Compliance Determination Requirements**

#### D.1.5 Particulate Matter Control [326 IAC 2-2] [326 IAC 2-3] [326 IAC 6-3] [326 IAC 6-4]

To demonstrate compliance with Conditions D.1.2 and D.1.3,

- (a) The wet suppression system shall operate as needed to control fugitive emissions when the slag processing plant is in operation.
- (b) The Permittee shall implement the fugitive dust control plan attached to the Part 70 Operating Permit (127-9691-00036), issued on August 12, 2004 to Beta Steel Corp.

This plan is also included as an attachment to this permit.

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

#### D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the slag processing transfer points shall be performed once per shift during normal daylight operations when exhausting to the atmosphere.  
  
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, when 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 operation shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

If abnormal emissions are observed from the slag processing operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit.

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 Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.7 Record Keeping Requirements**

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- (a) The Permittee shall maintain records of the monthly slag processed.
- (b) The Permittee shall maintain records of the once per shift visible emission notations of the slag processing **transfer points** and make the records available upon request to IDEM, OAQ, and the US EPA.
- (c) The Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan, and make the records available upon request to IDEM, OAQ, and the US EPA.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.1.8 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**QUARTERLY SLAG PROCESSED REPORT**

Source Name: Olympic Mill Services - a Division of Tube City, LLC  
- a contractor of Beta Steel Corporation  
Source Address: 6500 US Highway 12, Portage IN 46368  
Mailing Address: 1155 Business Center Drive, Suite 200, Horsham, PA 19044-3454  
Part 70 Permit No.: 127-20488-00104  
Slag Processed Limit: Less than 1,752,000 slag per 12-consecutive month period

Quarter:		Year:	
Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12- Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Form Completed by:
Title / Position:
Date:
Telephone:

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

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

<b>Source Background and Description</b>
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Source Name:	Olympic Mill Services - a Division of Tube City, LLC. - a contractor of Beta Steel Corp.
Source Location:	6500 US Highway 12, Portage IN 46368
Mailing Address:	300 Conoshohcken State Road, Suite 200 West Conoshohcken, PA 19428
County:	Porter
SIC Code:	3295
Source Status:	Major Source under PSD and Emission Offset Rules Part 70 Source Major Source, Section 112 of the Clean Air Act 1 of 28 Listed Source Categories
Significant Source Modification:	127-20430-00104
Part 70 Permit:	127-20488-00104
Permit Writer:	Iryn Calilung 317/233-5692 icalilun@dem.state.in.us

<b>Source Determination</b>
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The following two (2) sources were evaluated if they are considered as one (1) major source pursuant to 326 IAC 2-7-1(21) and 326 IAC 2-7-2:

Table 1 - - Major Source Determination		
Company Name	Location	Plant ID
Beta Steel Corp.	6500 South Boundary Road, Portage, IN 46368	127-00036
Olympic Mill Services	6500 US Highway 12, Portage IN 46368	127-00104

In accordance with the criteria specified in the IDEM Non Rule Policy (AIR-006 NPD September 24, 1996), it was determined that Beta Steel Corp., and Olympic Mill Services are considered as one source.

For administrative purposes, separate plant identifications and permits will be issued to Beta Steel Corp., and Olympic Mill Services.

For additional information about the non rule policy, refer to the IDEM's web site on the Internet at:  
<http://www.in.gov/idem/rules/policies/index.html>.

### Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed the application from Olympic Mill Services relating to the construction and operation of a slag processing plant, with a maximum feed rate of 200 tons of slag per hour, consisting of:

- (a) feeders,
- (b) screens,
- (c) conveyors,
- (d) crushers,
- (e) pulleys,
- (f) load in and load out batch operations,
- (g) storage piles,
- (h) transfer points,
- (i) scrap lancing operation,
- (j) ball drop operations, and
- (k) unpaved roads.

Particulate matter emissions are controlled by a wet suppression system.

### Emission Calculations

Calculations provided by the applicant have been verified to be correct. These calculations have been attached to this technical support document.

### Potential To Emit

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

Pollutant	Before Control	After Control
PM	Greater than 25	Less than 25
PM <sub>10</sub>	Greater than 15	Less than 15
SO <sub>2</sub>	--	--
VOC	--	--
CO	--	--
NO <sub>x</sub>	--	--
HAP	Less than 10 tons/year for single HAP and less than 25 tons/year for any combination.	

### Permit Level Determination

- (1) Approval to Construct - - 326 IAC 2-7-10.5(f)(4)
  - (a) Since the potential to emit of the proposed operation is greater than 25 tons/year before control, the proposed approval is a significant source modification, pursuant to 326 IAC 2-7-10.5(f)(4).
  - (b) The approval to construct for Olympic Mill Services is identified as 127-20430-00104.
- (2) Approval to Operate - - 326 IAC 2-7-12(d)
  - (a) Since Olympic Mill Services is considered as one source with Beta Steel, the Part 70 operating permit issued to Beta Steel Corp. has to be modified. However, for administrative purposes, a separate Part 70 operating permit will be issued for Olympic Mill Services.
  - (b) The approval to operate for Olympic Mill Services is identified as 127-20488-00104.
  - (c) The Part 70 Operating Permit (127-9691-00036) for Beta Steel Corp. was issued on August 12, 2004.
- (3) PSD Minor Modification to an Existing Major Source - - 326 IAC 2-2  
The proposed operation is considered a minor modification (Olympic Mill Services) to an existing major source (Beta Steel Corp.) because the potential to emit after control is less than the PSD, and Emission Offset significant levels.

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM <sub>10</sub>	Attainment
SO <sub>2</sub>	Unclassifiable
NO <sub>2</sub>	Attainment
1-Hour Ozone	Nonattainment
8-Hour Ozone	Nonattainment
CO	Attainment

- (1) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>)  
VOC and NO<sub>x</sub> are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

On January 26, 1996 in 40 CFR Part 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standard.

Porter County has been designated as nonattainment **in Indiana for the 1-hour ozone standard**. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

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

#### **Source Status**

Olympic Mill Services is considered as one source with Beta Steel Corp., therefore, Olympic Mill Services is also considered as:

- (1) a Major Source in terms of PSD and Emission Offset;
- (2) 1 of 28 Listed Source Categories under 326 IAC 2-2-1(gg); and
- (3) a Part 70 Source.

#### **Federal Rule Applicability**

- (1) There are no New Source Performance Standards (NSPS) 40 CFR Part 60 included in the permit for this proposed modification.
- (2) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) 40 CFR Part 61 or 40 CFR Part 63 included in the permit for this proposed modification.

#### **State Rule Applicability**

- (1) **326 IAC 2-2 Prevention of Significant Deterioration (PSD)**  
Since this type of operation is one of the 28 listed source categories under 326 IAC 2-2, the fugitive particulate matter (PM) emissions are counted toward determination of PSD applicability. The proposed modification is a PSD minor modification because the potential to emit after control are less than the PSD significant levels.
- (2) **326 IAC 2-3 Emission Offset**  
The proposed modification is a minor modification in terms of ozone because no VOC emissions will be emitted.
- (3) **326 IAC 2-6 (Emission Reporting)**  
The proposed modification is subject to the emission reporting under 326 IAC 2-6-1 because it is a Part 70 source.
- (4) **326 IAC 2-7 Part 70 Program**  
Olympic Mill Services is subject to the requirement of 326 IAC 2-7, because it is considered one source with Beta Steel Corp., which is a Part 70 source.

- (5) 326 IAC 5-1 Opacity Limitations  
The proposed modification is subject to the opacity standard specified in 326 IAC 5-1-2(1).
- (6) 326 IAC 6-3-2 (Process Operations)  
Since Porter County is not one of the counties specifically listed in 326 IAC 6-1, the particulate emissions from the slag processing operations are subject to 326 IAC 6-3.

The particulate matter (PM) emissions from the slag processing operation are determined by the interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$
$$E = 55.0 (200 \text{ tons/hour})^{0.11} - 40$$
$$E = 58.51 \text{ pounds per hour}$$

Based on the uncontrolled emission factors from AP-42 and the maximum operating hours per year (8,760 hours/year), the particulate emissions are less than the allowable emission rate.

- (7) 326 IAC 6-4 (Fugitive Dust Emissions)  
The proposed modification is subject to the requirements of 326 IAC 6-4, because it is a source of fugitive emissions.
- (8) 326 IAC 6-5 (Fugitive Particulate Matter Emissions)  
The Permittee is required to submit and implement a fugitive particulate matter emission control plan. Since Olympic Mill Services is an on-site contractor of Beta Steel Corp., the fugitive dust control plan incorporated in the existing Part 70 Operating Permit of Beta Steel Corp., will be the same plan that both the mill and contractor will implement.

<b>Recommendation and Conclusion</b>
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- (1) Unless otherwise stated, information used in this review was derived from the application and additional information received by the Office of Air Quality (OAQ) on December 2, 2004.
- (2) Based on the facts, conditions and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the preliminary findings for the:
- (a) approval to construct (SSM 127-20430-00104), and
  - (b) approval to operate (Part 70 Operating Permit 127-20488-00104)
- be approved.
- (3) The following government officials have been notified of this proposed construction:
- (a) Mayor of Portage, and
  - (b) Porter County Board of Commissioners.

- (4) Copies of the application and preliminary findings have been provided to the Portage Public Library, 2665 Irving St. Portage, IN 46368.

<b>IDEM Contact</b>
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Questions regarding this proposed permit can be directed to Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692 or by e-mail at [icalilun@dem.state.in.us](mailto:icalilun@dem.state.in.us).

For additional information about air permits and how the public can participate, see IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.IN.gov/idem/guides](http://www.IN.gov/idem/guides).

**Indiana Department of Environmental Management  
Office of Air Quality**

Addendum to the Technical Support Document (TSD) for a  
Significant Source Modification and Part 70 Operating Permit

<b>Source Background and Description</b>
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Source Name:	Olympic Mill Services - a Division of Tube City, LLC. - a contractor of Beta Steel Corp.
Source Location:	6500 US Highway 12, Portage IN 46368
Mailing Address:	<a href="#">1155 Business Center Drive, Suite 200</a> <a href="#">Horsham, PA 19044-3454</a>
County:	Porter
SIC Code:	<a href="#">7389</a>
Source Status:	Major Source under PSD and Emission Offset Rules Part 70 Source Major Source, Section 112 of the Clean Air Act 1 of 28 Listed Source Categories
Significant Source Modification:	127-20430-00104
Part 70 Permit:	127-20488-00104
Permit Writer:	Iryn Calilung 317/233-5692

<b>Public Notification and Participation</b>
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On March 19, 2005, the Office of Air Quality (OAQ) had a notice published in the Vidette Times, stating that Olympic Mill Services had applied for an air approval to construct and operate a slag processing plant. The public comment period ended on April 18, 2005.

The purpose of the 30-day public comment period is to allow anyone the opportunity to review and provide comment regarding the draft permit and its supporting documents. Comments regarding this permit do not demonstrate that the draft permit failed to meet the requirements for a permit. In many instances, the Indiana Department of Environmental Management (IDEM) has amended the permit and has satisfied both State and Federal regulations. The IDEM does not amend the Technical Support Document (TSD) and Appendices of the draft permit. They are maintained to document the original review. This addendum to the TSD indicates the comments, responses, and revisions made from the time the permit was drafted until a final decision is made.

<b>Comments from Olympic Mill Services</b>
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The following summarizes the comments submitted by Olympic Mill Services with the IDEM corresponding responses. Changes are shown in **bold** or ~~strikeout~~ fonts to show the differences.

Comment No. 1. General Information Update Responsible Official  
Please update the responsible official, mailing address, telephone, and SIC Code in Section A.1 of the draft permit.

IDEM Response: Section A.1 has been updated as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]  
The Permittee owns and operates a stationary slag processing plant.

Responsible Official: ~~Vice President – Technical Services~~  
**Director of Environmental Engineering**  
Source Location: 6500 US Highway 12, Portage IN 46368  
Mailing Address: ~~300 Conoshohocken State Road, Suite 200~~  
~~West Conoshohocken, PA 19428~~  
**1155 Business Center Drive, Suite 200**  
**Horsham, PA 19044-3454**  
General Source Phone Number: ~~610-729-7333~~ **215-956-5618**  
County: Porter  
SIC Code: ~~3295~~ **7389**  
Source Location Status: Nonattainment for 1-hour ozone standard  
Nonattainment for 8-hour ozone standard  
**Nonattainment for PM2.5**  
Attainment for all other criteria pollutants  
Source Status: Major Source under PSD and Emission Offset Rules  
Part 70 Source  
Major Source, Section 112 of the Clean Air Act  
1 of 28 Listed Source Categories

Comment No. 2. Condition D.1.5(a) (Wet Suppression System)  
Please revise condition D.1.5(a) to operate the wet suppression system and control fugitive emissions on an “as needed basis”, because operating the water systems all the times will result in problems with the material becoming overly wet and blinding screens and build up of clumps of material throughout the process.

IDEM Response: IDEM agrees with the recommended change.

D.1.5(a) The wet suppression system shall operate ~~at all times~~ **as needed to control fugitive emissions** when the slag processing plant is in operation.

### Changes Initiated by IDEM

The following changes were initiated by IDEM. Changes are shown in **bold** or ~~strikeout~~ fonts to show the differences.

- (1) Portions of the Table of Contents have been revised to be consistent throughout the permit.

B.16 Permit Renewal **[326 IAC 2-7-3]** [326 IAC 2-7-4]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) ~~p~~**P**ounds per ~~h~~**H**our [326 IAC 6-3-2]

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]  
**[326 IAC 2-2] [326 IAC 2-3]**

- (2) Section A.2 has been revised to correct the rule cite.

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]  
Pursuant to 326 IAC 2-7-1(24 **22**), 326 IAC 2-7-2 and in accordance with the IDEM Non Rule Policy (AIR-006 NPD September 24, 1996), Beta Steel Corporation and Olympic Mill Services are considered as one source.

Company Name	Location	Plant ID
Beta Steel Corp.	6500 S. Boundary Road, Portage, IN 46368	127-00036
Olympic Mill Services	6500 US Highway 12, Portage IN 46368	127-00104

For administrative purposes, separate plant identifications and permits are issued to Beta Steel Corporation and Olympic Mill Services.

- (3) Condition B.16 (Permit Renewal) has been revised to remove an extra comma.

B.16(b)(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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (4) Condition C.6 has been revised to correct a typographical error.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission ~~units~~ **units** vented to the control equipment are in operation.

- (5) Condition C.8 has been revised to add the following clarification.

**The requirement to use an Indiana Accredited Asbestos inspector is not federally**

**enforceable.**

- (6) Portions of Condition C.13 have been revised to remove extra commas.

C.13(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.

C.13(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]

- (7) Portions of Conditions C.18 and C.19 have been revised to add appropriate parentheses.

C.18(c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit or at a source with Plant-wide Applicability Limitation (PAL)), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

C.18(c)(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:

C.19(f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

- (8) Condition D.1.2 has been revised to add an annual production limitation and rule cites.

D.1.2 PSD Minor Limitations [326 IAC 2-2] [326 IAC 2-3]

- (a) **The annual slag processed shall be less than 1,752,000 tons of slag per 12-consecutive month period, with compliance determined at the end of each month.**

**This slag limitation is equivalent to less than 25 tons per year and 15 tons per year of PM and PM10 respectively.**

~~The particulate matter emissions from the slag processing operations shall not exceed 25 tons per year.~~

- ~~(b) The particulate matter with an aerodynamic diameter less than or equal to 10 micrometers shall not exceed 15 tons per year.~~

- (b) During the first twelve (12) months of operation, the slag processed shall be limited such that the total production divided by the accumulated months of operation shall be less than 146,000 tons per month.**

Compliance with these limitations makes 326 IAC 2-2 Prevention of Significant Deterioration (PSD) **and 326 IAC 2-3 Emission Offset** not applicable.

- (9) Condition D.1.6(a) has been revised to clarify the points where visible emission notations have to be observed by the Permittee.

D.1.6(a) Visible emission notations of the slag processing ~~exhaust~~ **transfer points** shall be performed once per shift during normal daylight operations when exhausting to the atmosphere.

- (10) Conditions D.1.7 has been revised to incorporate the changes mentioned above.

D.1.7 Record Keeping Requirements

**(a) The Permittee shall maintain records of the monthly slag processed.**

~~(a)~~ **(b)** The Permittee shall maintain records of the once per shift visible emission notations of the slag processing ~~exhaust~~ **transfer points** and make the records available upon request to IDEM, OAQ, and the US EPA.

~~(b)~~ **(c)** The Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan, and make the records available upon request to IDEM, OAQ, and the US EPA.

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

- (11) A reporting requirement (Condition D.1.8) has been added.

**D.1.8 Reporting Requirements**

**A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (12) A reporting form has been added.

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

**QUARTERLY SLAG PROCESSED REPORT**

**Source Name: Olympic Mill Services - a Division of Tube City, LLC  
- a contractor of Beta Steel Corporation**  
**Source Address: 6500 US Highway 12, Portage IN 46368**  
**Mailing Address: 1155 Business Center Drive, Suite 200, Horsham, PA 19044-3454**  
**Part 70 Permit No.: 127-20488-00104**  
**Slag Processed Limit: Less than 1,752,000 slag per 12-consecutive month period**

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Quarter:		Year:	
Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12- Month Total

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

<b>Form Completed by:</b>
<b>Title / Position:</b>
<b>Date:</b>
<b>Telephone:</b>

**Attach a signed certification to complete this report.**

- (13) Nonattainment status  
IDEM clarifies that Porter County is classified as nonattainment for 1-hour ozone standard, 8-hour ozone standard and PM2.5.

#### Recommendation and Conclusion

Based on the facts, conditions and evaluations made, the OAQ staff recommends to the IDEM's Commissioner that the preliminary findings for the:

- (a) approval to construct (**SSM 127-20430-00104**), and
- (b) approval to operate (**Part 70 Operating Permit 127-20488-00104**)

be approved.

#### IDEM Contact

Questions regarding the proposed permits can be directed to Iryn Calilung at the Indiana Department Environmental Management, Office of Air Quality, 100 North Senate Avenue, Indianapolis, Indiana 46204 or by telephone at (317) 233-5692 or toll free at 1-800-451-6027 extension 3-5692.

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