



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 25, 2005  
RE: Ispat/Inland Steel-Fritz Enterprises, Inc. / 089-20905-00465  
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



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**PART 70 MINOR SOURCE  
MODIFICATION  
OFFICE OF AIR QUALITY**

**Ispat/Inland Steel - 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.

Source Modification No.: 089-20905-00465	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 25, 2005

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Ispat/Inland Steel - Fritz Enterprises, Inc.  
East Chicago, Indiana  
Permit Reviewer: Jenny Acker

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Certification Form  
Quarterly Report Form  
Affidavit  
Attachment A

## 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 2-7-4(c)][326 IAC 2-7-5(15)]

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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 under the 1-hour and 8-hour standard, SO <sub>2</sub> and PM2.5.
Source Status:	Attainment for all other criteria pollutants Part 70 Permit Program Major Source, under PSD and 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 2-7-1(22)]

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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 2-7-4(c)(3)]

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

- (a) One (1) mobile screening operation, consisting of the following:
  - (1) One (1) mobile rotary drum screen (trommel), identified as SS-2, installed in 2005, with a maximum capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour, and exhausting to the atmosphere.
  - (2) One six-cylinder diesel engine integral to rotary drum screen (SS-2), identified as SD-2, with a maximum rated capacity of 200 horsepower, and exhausting to atmosphere.

- (3) Two (2) portable stacking conveyor belts, installed in 2005, with a maximum combined capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour.
- (4) One (1) diesel drive engine for conveyors, identified as SD-3, installed in 2005, with a maximum rated capacity of 45 horsepower, and exhausting to atmosphere.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

## **SECTION B GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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

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

### **B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.4 Phase Construction Time Frame**

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Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this approval to construct if the:

- (a) Construction of the mobile screening unit has not begun within eighteen (18) months from the effective date of this approval or if during the construction of mobile screening unit, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

## SECTION C GENERAL OPERATION CONDITIONS

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

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- (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 a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, 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  
Indianapolis, Indiana 46204

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

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, 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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The

records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

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

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

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

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).

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 PM<sub>10</sub> 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.

**C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]**

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Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on June 9, 2003.

**C.8 Operation of Equipment [326 IAC 2-7-6(6)]**

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Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.9 Stack Height [326 IAC 1-7]**

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The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

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

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

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

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

#### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

#### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing 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.

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

#### **C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (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 as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and 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 a minor permit modification 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) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are 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.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Emergency Provisions [326 IAC 2-7-16]

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

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

Facsimile Number: 317-233-5967

Northwest Regional Office  
8315 Virginia St, Suite 1  
Merrillville, IN 46410-9201  
Phone 1-219-757-0265  
Phone 1-888-209-8892 (toll free within Indiana)  
Fax 1-219-757-0267

- (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  
Indianapolis, Indiana 46204

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

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

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner 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.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) The reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) 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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) 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.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

- (a) One (1) mobile screening operation, consisting of the following:
- (1) One (1) mobile rotary drum screen (trommel), identified as SS-2, installed in 2005, with a maximum capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour, and exhausting to the atmosphere.
  - (2) One six-cylinder diesel engine integral to rotary drum screen (SS-2), identified as SD-2, with a maximum rated capacity of 200 horsepower, and exhausting to atmosphere.
  - (3) Two (2) portable stacking conveyor belts, installed in 2005, with a maximum combined capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour.
  - (4) One (1) diesel drive engine for conveyors, identified as SD-3, installed in 2005, with a maximum rated capacity of 45 horsepower, and exhausting to atmosphere.

(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 Part 70 NO<sub>x</sub> Minor Limit [326 IAC 2-7]

The hours of operation of each diesel engine (SD-2 and SD-3) shall be less than 6557 hours per 12 consecutive month period with compliance determined at the end of each month. This hourly limit is required to limit the potential to emit of nitrogen oxides (NO<sub>x</sub>) to less than 25 tons per 12 consecutive month period.

#### D.1.2 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 the rotary drum screen and from each conveyor transfer point shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.1.4 PM and PM<sub>10</sub> Control

In order to comply with Conditions D.1.2, the Permittee shall use wet suppression to control emissions of PM and PM<sub>10</sub> from the rotary drum screen and the conveyors 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 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 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.5 Visible Emissions Notations**

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- (a) Visible emission notations of the exhausts from the rotary drum screen and from each conveyor transfer point 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 2-7-5(3)] [326 IAC 2-7-19]]**

### **D.1.6 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the hours of operation of diesel engines SD-2 and SD-3.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of the chemical analysis of the processed material, as needed.
- (c) To document compliance with Condition D.1.5, the Permittee shall maintain once per shift records of visible emission notations of the rotary drum screen and transfer points.
- (e) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

### **D.1.7 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition D.1.1 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. 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

### PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Fritz Enterprises, Inc.  
Source Address: 3210 Watling, East Chicago, Indiana, 46312  
Mailing Address: 1650 Jefferson, Trenton, MI 48183  
Source Modification No.: 089-20905-000465

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

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

**Part 70 Source Modification 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 Engines (SD-2 and SD-3)  
**Parameter:** Hours of Operation  
**Limit:** 6,557 hours per 12 consecutive month period, each engine

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.

# **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 PM<sub>10</sub> 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

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

#### Source Background and Description

Source Name:	Ispat/Inland Steel - 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
Minor Source Modification No.:	089-20905-00465
Permit Reviewer:	Jenny Acker

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

One (1) mobile screening operation, consisting of the following:

- (1) One (1) mobile rotary drum screen (trommel), identified as SS-2, installed in 2005, with a maximum capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour, and exhausting to the atmosphere.
- (2) One six-cylinder diesel engine integral to the rotary drum screen (SS-2), identified as SD-2, with a maximum rated capacity of 200 horsepower, and exhausting to atmosphere.
- (3) Two (2) portable stacking conveyor belts, installed in 2005, with a maximum combined capacity of 200 tons per hour and an average sustainable capacity of 125 tons per hour.
- (4) One (1) diesel drive engine for conveyors, identified as SD-3, installed in 2005, with a maximum rated capacity of 45 horsepower, and exhausting to atmosphere.

#### 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 FESOP No. F089-14058-00465 because less than 50% of the Fritz's business was with Ispat.

On January 13, 2004 Fritz was issued an Significant Permit Revision (089-17404-00465) for the construction and operation of a coke screening plant and associated operations at this location. The new coke screening plant processes coke received either from Ispat, or Ispat's contractors. IDEM, OAQ 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 was required to 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). Fritz submitted a timely Part 70 permit application (089-20315-00465) on January 10, 2005.

### **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 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on March 7, 2005. A revised application was received on March 22, 2005.

### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 3).

**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	19.33
PM-10	8.33
SO <sub>2</sub>	2.20
VOC	2.65
CO	7.17
NO <sub>x</sub>	33.27

**Justification for Modification**

This modification is being performed as a minor source modification pursuant to 326 IAC 2-7-10.5(d)(4)(B) as this modification potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant by limiting the hours of operation of the two (2) diesel engines.

**County Attainment Status**

The source is located in Lake County.

Pollutant	Status
PM-2.5	Nonattainment
PM-10	Attainment
SO <sub>2</sub>	Primary Nonattainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Severe Nonattainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
  - (1) On January 26, 1996 in 40 CFR 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 NOx threshold for Emission Offset requirements, 326 IAC 2-3. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Lake County has been designated as nonattainment for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S.EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S.EPA's guidance to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Non-attainment New Source Review requirements.
- (d) 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.
- (e) 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	Greater than 100
PM-10	Greater than 100
SO <sub>2</sub>	Greater than 100
VOC	Greater than 25
CO	Greater than 100
NO <sub>x</sub>	Greater than 100

- (a) This existing source (Fritz Enterprises, Inc.) is considered collocated with Ispat Inland, Inc. (Plant ID #089-00316). 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. is considered a PSD and Emission Offset major source.

**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 Federally Enforceable State Operating Permit Revision.

Process / Facility	Potential to Emit (tons per year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPS
Diesel Engines (SD-2)(SD-3)	1.77	1.77	1.65	1.98	5.37	24.90	--
Rotary Drum Screen (SS-2) and Conveyor Transfer Points	1.36	0.46	--	--	--	--	--
Total PTE of the Modification	3.13	2.23	1.65	1.98	5.37	24.90	--
PSD and Emission Offset Thresholds	25	15	40	25	100	40	NA

- (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.

**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 mobile screening operation does not have a crusher. 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) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61)(326 IAC 20 and 40 CFR 63) applicable to this modification.
- (d) 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  $PM_{10}$  emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, 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 PM<sub>10</sub> 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**

**326 IAC 2-7 NOx Minor Limit (Part 70 Permits)**

This source is 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 NO<sub>x</sub> emissions from the two (2) diesel engines, identified as SD-2 and SD-3, of this mobile screening operation shall not operate more than 6557 hours per 12 consecutive months, each.

This is equivalent to 24.9 tons/yr of NO<sub>x</sub> emissions. Therefore, this source modification shall be considered a minor modification according to the requirements of 326 IAC 2-7.

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

The equipment at this mobile 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 mobile screening operation, is greater than 100 tons/yr. Therefore, this mobile screening operation 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).

**326 IAC 7-1.1-2 (Sulfur Dioxide (SO<sub>2</sub>) Emission Limitations)**

The potential to emit SO<sub>2</sub> from the proposed diesel engines is less than 25 tons/yr. Therefore, the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide (SO<sub>2</sub>) 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 engines is less than twenty five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 (BACT) are not applicable.

**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 rotary drum screen and the conveyors have applicable compliance monitoring conditions as specified below:

Visible emissions notations of the exhausts from the rotary drum 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. Failure to take response steps in accordance with Section C – Compliance Response Plan – Implementation, Records, and Reports, shall be considered a deviation from this permit,

These monitoring conditions are necessary because the rotary drum screen and the conveyors of the new mobile screening operation 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).

## **Conclusion**

The construction and operation of this proposed modification shall be subject to the conditions of the attached proposed Minor Source Modification No. 089-20905-00465.

**Appendix A: Emission Calculations  
PM10 Emissions  
From the Portable Trommel System**

**Company Name: Fritz Enterprises, Inc.  
Address: 3210 Watling Street, East Chicago, IN 46312  
SPR #: 089-20905-00465  
Reviewer: Jenny Acker  
Date: March 28, 2005**

Maximum Throughput Rate:

(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)
Trommel Screen	1	0.0087	1.088	4.76	0.00074	0.093	0.41
Conveyor Transfer Points	2	0.0011	0.138	1.20	0.000046	0.006	0.05
<b>Total</b>				<b>5.97</b>			<b>0.46</b>

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.

**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 Portable Trommel System**

**Company Name: Fritz Enterprises, Inc.  
Address: 3210 Watling Street, East Chicago, IN 46312  
SPR #: 089-20905-00465  
Reviewer: Jenny Acker  
Date: March 28, 2005**

Maximum Throughput Rate:

125

 (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)
Trommel Screen	1	0.025	3.125	13.69	0.0022	0.275	1.20
Conveyor Transfer Points	2	0.003	0.375	3.29	0.00014	0.018	0.15
<b>Total</b>				<b>16.97</b>			<b>1.36</b>

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.

**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**

**Company Name: Fritz Enterprises, Inc.**  
**Address: 3210 Watling Street, East Chicago, IN 46312**  
**SPR #: 089-20905-00465**  
**Reviewer: Jenny Acker**  
**Date: March 28, 2005**

Description (Facility ID)	Max. Power Output Horse Power
Trommel Driver (SD-2)	200.0
Conveyor Driver (SD-3)	45.0
Limited Hours of Operation	6557

Pollutant - Unlimited PTE						
Emission Factor in lb/HP-hr	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	**VOC	CO
	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.47E-03	6.68E-03
<b>Potential Emission in tons/yr</b>						
Trommel Driver (SD-2)	1.93	1.93	1.80	27.16	2.16	5.85
Conveyor Driver (SD-3)	0.43	0.43	0.40	6.11	0.49	1.32
<b>Total PTE =</b>	<b>2.36</b>	<b>2.36</b>	<b>2.20</b>	<b>33.27</b>	<b>2.65</b>	<b>7.17</b>

\*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)

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

Pollutant - Limited PTE based on Hours						
Emission Factor in lb/HP-hr	PM*	PM10*	SO <sub>2</sub>	NO <sub>x</sub>	**VOC	CO
	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.47E-03	6.68E-03
<b>Potential Emission in tons/yr</b>						
Trommel Driver (SD-2)	1.44	1.44	1.34	20.33	1.62	4.38
Conveyor Driver (SD-3)	0.32	0.32	0.30	4.57	0.36	0.99
<b>Total PTE =</b>	<b>1.77</b>	<b>1.77</b>	<b>1.65</b>	<b>24.90</b>	<b>1.98</b>	<b>5.37</b>

**Calculate Hours to Limit NO<sub>x</sub> to 24 tpy**

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

Hours per year limitation = Emission (tons/yr) / [Power Output (HP) \* Emission Factor (lb/HP-hr)] \* 2000 lbs/ton

Hours per year limitation = 24.9 (tons/yr) / [245 (HP) / 3.10E-02 (lb/HP-hr)] \* 2000 lbs/ton

Hours per year limitation = 6556.95

**Calculate Limited Emissions Based on Hours**

Emission (tons/yr) = Power Output (HP) x Emission Factor (lb/HP-hr) x 6557 hr/yr x 1 tons/2000 lbs