



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: April 19, 2010

RE: USS - IMS Division, Tube City IMS / 089-23679-00132

FROM: Matthew Stuckey, Branch 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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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Mr. Michael Connolly  
IMS Division, Tube City IMS  
1155 Business Center Drive  
Horsham, PA 19044

April 19, 2010

Re: 089-23679-00132  
Significant Permit Modification to:  
Part 70 Operating Permit No.: T089-5630-00132

Dear Mr. Connolly:

IMS Division, Tube City IMS (formerly known as International Mill Service, Inc.) was issued Part 70 Operating Permit T089-5630-00132 on August 17, 2006 for a stationary slag processing and metal recovery operation. A petition appealing portions of this permit was received on September 21, 2006. Pursuant to the provisions of 326 IAC 2-7-12, an appeal resolution through a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The appeal resolution includes a change to the source name, corrections to descriptive information for two emission units and changes to the compliance determination language for fugitive dust control. Some other conditions of the permit have been updated by IDEM. Please find attached the entire Part 70 Operating Permit as modified.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jean Boling at OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call (800) 451-6027, and ask for Jean Boling or extension 4-5400, or dial (317) 234-5400.

Sincerely,

Donald F. Robin, P.E., Section Chief  
Permits Branch  
Office of Air Quality

Attachments:  
Part 70 Significant Permit Modification  
Technical Support Document (TSD) for a Part 70 Significant Permit Modification

DFR/jcb

cc: File - Lake County  
IDEM Northwest Regional Office  
U.S. EPA, Region V  
Lake County Health Department  
Compliance and Enforcement Branch



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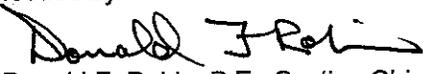
## Part 70 Operating Permit OFFICE OF AIR QUALITY

**IMS Division, Tube City IMS  
an on-site Contractor of US Steel-Gary Works  
One North Broadway  
Gary, Indiana 46402**

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

**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 Section B, 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.

Operation Permit No.: T089-5630-00132	
Issued by:/Original Signed by: Nisha Sizemore, Branch Chief Office of Air Quality	Issuance Date: August 17, 2006 Expiration Date: August 17, 2011
First Significant Permit Modification No.: 089-23679-00132	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: April 19, 2010 Expiration Date: August 17, 2011

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## SECTION A SOURCE SUMMARY

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

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The Permittee owns and operates a slag processing and metal recovery operation as a contractor at US Steel - Gary Works.

Source Address:	One North Broadway, Gary, Indiana 46402
Mailing Address:	1155 Business Center Drive, Horsham, PA 19044-3454
General Source Phone Number:	219-885-7491
SIC Code:	primary operation (steel mill): 3312 contractor operation (business services): 7389
Source Location Status:	Nonattainment for 8 hour ozone Nonattainment for PM 2.5 Attainment or unclassifiable for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules, and Nonattainment NSR 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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US Steel - Gary Works is an integrated steel mill that consists of a main mill and an on-site contractor:

- (a) US Steel-Gary Works, 089-00121, the primary operation, is located at One North Broadway, Gary, IN 46402; and
- (b) IMS Division, Tube City IMS, 089-00170, the on-site contractor, is located at One North Broadway, Gary, IN 46402

Separate Part 70 Operating permits have been issued to US Steel, Gary Works (T089-7663-00121) and IMS Division, Tube City IMS (T089-5630-00132) solely for administrative purposes.

### 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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IMS Division, Tube City IMS consists of the following:

- (a) One (1) kish iron crushing operation, identified as M029, constructed in October 1990, with a maximum capacity of 125 tons per hour, with emissions controlled by building enclosure, kish iron pre-watering and use of water sprays consisting of the following:
  - (1) One (1) jaw crusher;
  - (2) One (1) hammer mill;

- (3) Two (2) screens;
  - (4) Sixteen (16) conveyers;
  - (5) Storage piles, four-tenths (0.4) acre with storage capacity of 6,000 tons; and
  - (6) Unpaved haul road traffic.
- (b) One (1) slag processing plant, identified as M057, constructed in October 6, 1995, with a maximum capacity of 1,000 tons per hour, with emissions controlled by slag pre-watering and water sprays consisting of the following:
- (1) Five (5) screen stations;
  - (2) Eighteen (18) conveyers;
  - (3) Storage piles, nine-tenths (0.9) acre with storage capacity of 16,000 tons;
  - (4) One (1) VSI crusher, constructed October 1997;
  - (5) Four (4) conveyers, constructed October 1997; and
  - (6) Unpaved haul road traffic; and
  - (7) Material transfers.
- (c) One (1) steel slab scarfing plant, constructed in August 1991, with a maximum capacity of 180 tons per hour, controlled by a baghouse, ducted to the Scarfing Stack, using a 1.5 MMBtu per hour natural gas flame.
- (d) Oxygen lancing of metal, with a maximum capacity of 50 tons per hour, controlled by building enclosure.
- (e) One (1) chip plant, identified as M059, to be constructed within eighteen (18) months of the issuance of this permit. This chip plant has a maximum capacity of 150 tons per hour, with emissions controlled by slag pre-watering and water sprays, consisting of the following:
- (1) Two (2) screen stations and
  - (2) Four (4) conveyers
- (f) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity of 21,000 gallons, and an approximate throughput of 230,000 gallons per month.
- (g) Storage tanks with capacity of 25,000 gallons and an approximate annual throughput of 250,000 gallons.

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

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IMS Division, Tube City IMS also includes the following specifically regulated insignificant activities:

- (a) Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-9-1]

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) and
- (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 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]**

- (a) This permit, T089-5630-00132, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal 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.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### **B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]**

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

### **B.5 Severability [326 IAC 2-7-5(5)]**

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

### **B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]**

---

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "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).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**B.10 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) within ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (b) 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and 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 and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) 757-0265; fax: (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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may

require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) 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.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T089-5630-00132 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ determines any of the following: may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal** [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (2) 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) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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(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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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

- (c) 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)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 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.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

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

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 Fugitive Dust Emissions [326 IAC 6.8-10 and 326 IAC 6.8-11]

- (a) Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1(d) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
  - (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
  - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
  - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%) three (3) minute average. This includes material transfer to initial hopper of material processing facility as defined in 326 IAC 6.8-10-2 or material transfer for transportation within or outside the source property including but not limited to the following:

- (A) Transfer of slag product for use in asphalt plant
  - (i) From a storage pile to a front end loader; and
  - (ii) From a front end loader to a truck.
- (B) Transfer of sinter blend for use at the sinter plant:
  - (i) From a storage pile to a front end loader; and
  - (ii) From a front end loader to a truck; and
  - (iii) From a truck to the initial processing point
- (C) Transfer of coal for use at a coal processing line:
  - (i) From a storage pile to a front end loader, and
  - (ii) From a front end loader to the initial hopper of a coal processing line.

Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive operations recorded at fifteen (15) second intervals for the duration of the operation.

- (4) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
  - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a three (6) minute average.
  - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (5) 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.
- (6) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. These limitations may not apply during periods when application of fugitive particulate control measures is either ineffective or unreasonable due to sustained very high wind speeds. During such periods the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting opacity limitation was not reasonable given prevailing wind conditions.
- (7) There shall be a zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with in-plant transportation requirement.
- (8) The opacity of fugitive particulate emissions from the in plant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (9) 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.

- (10) 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.
  - (11) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
  - (12) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.
  - (13) PM<sub>10</sub> emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity.
  - (14) Fugitive particulate matter from the material processing facilities except at a crusher in which a capture system is not used shall not exceed ten percent (10%) opacity.
  - (15) Fugitive particulate matter from a crusher in which a capture system is not used shall not exceed fifteen percent (15%) opacity.
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan attached.
- (c) The source is subject to 326 IAC 6.8-11 (formerly 6-1-11.2) Lake County Particulate Matter Contingency Measures), because it is subject to the requirements of 326 IAC 6.8-10. Pursuant to this rule, the source shall comply with 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6.

**C.6 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. The provisions of 326 IAC 1-7-1(3), 1-7-2, 1-7-3 (c) and (d), 1-7-4 and 326 IAC 1-7-5 (a) (b) and (d) are not federally enforceable.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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

(C) Waste disposal site.

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

#### **C.9 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 by issuing an order under 326 IAC 2-1.1-11. 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.10 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance or ninety (90) days of initial start-up, whichever is later. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

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

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.11 Continuous Compliance Plan (CCP) [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]**

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- (a) Pursuant to 326 IAC 6.8-8-1 (formerly 326 IAC 6-1-10.1(l)), the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

- (b) Pursuant to 326 IAC 6.8-8 (formerly 326 IAC 6-1-10.1(s)-(v)), the Permittee shall update the CCP, as needed, retain a copy any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP to IDEM, OAQ within thirty (30) days of the update.
- (c) Pursuant to 326 IAC 6.8-8 (formerly 326 IAC 6-1-10.1(s)-(v)), failure to submit a CCP, maintain all information required by the CCP at the source, or submit updates to a CCP is a violation of 326 IAC 6.8-8.

**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.

**C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]  
[326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.17 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 response action 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.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]  
[326 IAC 2-6]

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- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.

- (b) The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-2-1 (ee) and/or 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/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
  - (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

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- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue,  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (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/or 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:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.

## **Stratospheric Ozone Protection**

### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1]**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

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

One (1) kish iron crushing operation, identified as M029, constructed October 1990, with a maximum capacity of 125 tons per hour, with emissions controlled by building enclosure, kish iron pre-watering and use of water sprays consisting of the following:

- (1) One (1) jaw crusher;
- (2) One (1) hammer mill;
- (3) Two (2) screens;
- (4) Sixteen (16) conveyers;
- (5) Storage piles, four-tenths (0.4) acre with storage capacity of 6,000 tons; and
- (6) Unpaved haul road traffic.

(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 Fugitive Dust Emission Limitations [326 IAC 6-4-2][326 IAC 6.8-10-3]

(a) Pursuant to 326 IAC 6-4-2:

(1) The jaw crusher, hammer mill, screens and conveyors generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

(A) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R - U)}{U}$$

Where:

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

(B) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$PR = (1.5 \pm N) P$$

Where:

N = Fraction of fugitive dust that is respirable dust;

PR = allowable percentage increase in dust concentration above background; and

P = no value greater than sixty-seven percent (67%).

- (C) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
  - (D) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (2) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.
- (b) Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC6-1-11.1(d)) Lake County Fugitive Particulate Matter Emissions Limitations, fugitive emissions from the jaw crusher, hammer mill, screens and conveyors generating fugitive dust shall comply with the emissions limitations in Section C - Fugitive Dust Emissions.

#### D.1.2 Preventive Maintenance Plan

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A preventive maintenance plan, accordance with Section B - Preventive Maintenance Plan, of this permit is required for the kish iron crushing operation and the associated control devices.

### Compliance Determination Requirements

#### D.1.3 Particulate Matter Control

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In order to comply with Condition D.1.1, the Permittee shall apply an initial application of water to the kish iron to control particulate matter from the iron. The water spray control for fugitive particulate emissions from the kish iron crushing, screening and conveying operations and other fugitive dust sources shall be applied in a manner and at a frequency sufficient to ensure compliance with Condition D.1.1.

#### D.1.4 Particulate Matter (PM) [326 IAC 6.8-10] [326 IAC 2-2][326 IAC 2-1.1-5]

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Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

Opacity from the activities shall be determined as follows:

- (1) Paved Roads and Parking Lots  
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of

three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

- (A) The first will be taken at the time of emission generation.
- (B) The second will be taken five (5) seconds later.
- (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (2) **Unpaved Roads and Parking**  
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.
- (3) **Batch Transfer**  
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (4) **Continuous Transfer**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (5) **Wind Erosion from Storage Piles**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when applications of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (6) **Wind Erosion from Exposed Areas**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
- (7) **Material Transported by Truck or Rail**  
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in plant transportation requirement.

- (8) Material Transported by Front End Loader or Skip Hoist  
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:
- (A) The first will be taken at the time of emission generation.
  - (B) The second will be taken five (5) seconds later.
  - (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (9) Material Processing Limitations  
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipments shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

#### **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 jaw crusher, hammer mill, screens and conveyors transfer points exhaust shall be performed once per day 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, 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, 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.1.6 Record Keeping Requirements

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- (a) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), the Permittee shall keep the following documentation to show compliance with each of its control measures and control practices:
- (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.
  - (2) For each application of water or chemical solution to roadways, the following shall be recorded:
    - (A) The name and location of the roadway controlled;
    - (B) Application rate;
    - (C) Time of each application;
    - (D) Width of each application;
    - (E) Identification of each method of application;
    - (F) Total quantity of water or chemical used for each application;
    - (G) For each application of chemical solution, the concentration and identity of the chemical; and
    - (H) The material data safety sheets for each chemical.
  - (3) For application of physical or chemical control agents not covered by 326 IAC 6.8-10-1, the following:
    - (A) The name of the agent;
    - (B) Location of application;
    - (C) Application rate;
    - (D) Total quantity of agent used;
    - (E) If diluted, percent of concentration; and
    - (F) The material data safety sheets for each chemical.
  - (4) A log recording incidents when control measures were not used and a statement of explanation.
  - (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of visible emission notations of the jaw crusher, hammer mill, screens and conveyors transfer points once per day.

- (c) 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) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), a quarterly report shall be submitted, stating the following:
  - (1) The dates any required control measures were not implemented.
  - (2) A listing of those control measures.
  - (3) The reasons that the control measures were not implemented.
  - (4) Any corrective action taken.
- (b) This report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

One (1) slag processing plant, identified as M057, constructed in October 6, 1995, with a maximum capacity of 1,000 tons per hour, with emissions controlled by slag pre-watering and water sprays consisting of the following:

- (1) Five (5) screen stations;
- (2) Eighteen (18) conveyers;
- (3) Storage piles, nine-tenths (0.9) acre with storage capacity of 16,000 tons;
- (4) One (1) VSI crusher, constructed October 1997;
- (5) Four (4) conveyers, constructed October 1997;
- (6) Unpaved haul road traffic; and
- (7) Material transfers.

(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.2.1 Emission Offset Minor Particulate Limit [326 IAC 2-3]

Pursuant to CP 089-4337-00132, issued on March 31, 1995, the input of raw material to the slag processing plant M057 shall be less than 2.3 million tons per year, based on a 12 consecutive month period with compliance demonstrated at the end of each month. Compliance with this limit makes the requirements of 326 IAC 2-3 Emission Offset, not applicable.

#### D.2.2 Fugitive Dust Emission Limitations [326 IAC 6-4-2][326 IAC 6.8-10-3]

(a) Pursuant to 326 IAC 6-4-2:

- (1) The screens, conveyors and crusher generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:
  - (A) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R - U)}{U}$$

Where:

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

- (B) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$PR = (1.5 \pm N) P$$

Where:

N = Fraction of fugitive dust that is respirable dust;

PR = allowable percentage increase in dust concentration above background; and

P = no value greater than sixty-seven percent (67%).

- (C) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
- (D) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (2) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

- (b) Pursuant to 326 IAC 6.8-10-3 Lake County Fugitive Particulate Matter Emissions Limitations, fugitive emissions from the screens, conveyors and crusher generating fugitive dust shall comply with the emissions limitations in Section C - Fugitive Dust Emissions.

#### D.2.3 Preventive Maintenance Plan

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A preventive maintenance plan, accordance with Section B - Preventive Maintenance Plan, of this permit is required for the slag processing plant and the associated control devices.

### Compliance Determination Requirements

#### D.2.4 Particulate Matter Control

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In order to comply with Condition D.2.2, the Permittee shall apply an initial application of water to the slag to control particulate matter from the slag. The water spray control for fugitive particulate emissions from the screens, conveyors and crusher shall be applied in a manner and at a frequency sufficient to ensure compliance with Condition D.2.2.

#### D.2.5 Particulate Matter (PM) [326 IAC 6.8-10] [326 IAC 2-2][326 IAC 2-1.1-5]

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Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

Opacity from the activities shall be determined as follows:

- (1) **Paved Roads and Parking Lots**  
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:
  - (A) The first will be taken at the time of emission generation.
  - (B) The second will be taken five (5) seconds later.
  - (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.
- (2) **Unpaved Roads and Parking**  
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.
- (3) **Batch Transfer**  
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (4) **Continuous Transfer**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (5) **Wind Erosion from Storage Piles**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when applications of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (6) **Wind Erosion from Exposed Areas**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

- (7) **Material Transported by Truck or Rail**  
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in plant transportation requirement.
- (8) **Material Transported by Front End Loader or Skip Hoist**  
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:
- (A) The first will be taken at the time of emission generation.
- (B) The second will be taken five (5) seconds later.
- (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (9) **Material Processing Limitations**  
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipments shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

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

#### **D.2.6 Visible Emissions Notations**

---

- (a) Visible emission notations of the screens, conveyor transfer points, and crusher exhaust stacks shall be performed once per day 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, 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C Response to Excursions or Exceedances, 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.2.7 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records of the raw material input for the slag processing plant M057.
  
- (b) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), the Permittee shall keep the following documentation to show compliance with each of its control measures and control practices:
  - (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.
  - (2) For each application of water or chemical solution to roadways, the following shall be recorded:
    - (A) The name and location of the roadway controlled;
    - (B) Application rate;
    - (C) Time of each application;
    - (D) Width of each application;
    - (E) Identification of each method of application;
    - (F) Total quantity of water or chemical used for each application;
    - (G) For each application of chemical solution, the concentration and identity of the chemical; and
    - (H) The material data safety sheets for each chemical.
  - (3) For application of physical or chemical control agents not covered by 326 IAC 6.8-10-1, the following:
    - (A) The name of the agent;
    - (B) Location of application;
    - (C) Application rate;
    - (D) Total quantity of agent used;
    - (E) If diluted, percent of concentration; and
    - (F) The material data safety sheets for each chemical.
  - (4) A log recording incidents when control measures were not used and a statement of explanation.
  - (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.

- (c) To document compliance with Condition D.2.6, the Permittee shall maintain records of visible emission notations of the screens, conveyor transfer points and crusher exhaust stacks once per day.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.8 Reporting Requirements

---

- (a) A summary of the information to document compliance with D.2.1 shall be submitted using the reporting form located at the end of this permit, or their equivalent
- (b) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), a quarterly report shall be submitted, stating the following:
  - (1) The dates any required control measures were not implemented.
  - (2) A listing of those control measures.
  - (3) The reasons that the control measures were not implemented.
  - (4) Any corrective action taken.
- (c) These reports shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

One (1) steel slab scarfing plant, constructed in August 1991, with a maximum capacity of 180 tons per hour, controlled by a baghouse, ducted to the Scarfing Stack, using a 1.5 MMBtu per hour natural gas flame.

(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.3.1 Emission Offset Minor Particulate Limit [326 IAC 2-3]

Pursuant to CP 089-2092-00132, issued on September 13, 1991, 326 IAC 2-3 Emission Offset), the particulate matter emissions from the scarfing operation shall not exceed 0.004 gr/dscf at an actual flow of 90,000 cfm. This limit makes the provisions of 326 IAC 2-3 (Emission Offset), not applicable.

#### D.3.2 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (formerly 326 IAC 6-1-2(a)) (Particulate Matter Limitations for Lake County), the particulate matter emissions from the scarfing operation shall be limited to three-hundredths (0.03) grain per dry standard cubic foot (dscf).

#### D.3.3 Preventive Maintenance Plan

A preventive maintenance plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for the scarfer and baghouse for particulate matter control device.

### Compliance Determination Requirements

#### D.3.4 Particulate Matter Control [326 IAC 2-7-6(6)]

- (a) Pursuant to CP 089-2092-00132, issued on September 13, 1991, and in order to comply with Conditions D.3.1 and D.3.2, the baghouse for particulate control shall be in operation and control particulate emissions from the scarfing building at all times the scarfing process is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

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

#### D.3.5 Visible Emissions Notations

- (a) Visible emission notations of the scarfing operations stack shall be performed once per day 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, 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

#### D.3.6 Parametric Monitoring

---

The Permittee shall record the total pressure drop across the baghouse used in conjunction with the scarfing process, at least once per day when the scarfing process is in operation when venting to the atmosphere, when for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

#### D.3.7 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouses controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the scarfer. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

#### D.3.8 Record Keeping Requirements

---

- (a) To document compliance with Condition D.3.5, the Permittee shall maintain records of visible emission notations of the scarfing stack exhaust once per day.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records of the pressure drop across the scarfer baghouse once per day.

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

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

One (1) oxygen lancing metal plant, with a maximum capacity of 50 tons per hour, controlled by building enclosure.

(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.4.1 Fugitive Dust Emission Limitations [326 IAC 6-4-2][326 IAC 6.8-10-3]

(a) Pursuant to 326 IAC 6-4-2:

(1) The oxygen lancing process generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

(A) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R - U)}{U}$$

Where:

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

(B) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$PR = (1.5 \pm N) P$$

Where:

N = Fraction of fugitive dust that is respirable dust;

PR = allowable percentage increase in dust concentration above background; and

P = no value greater than sixty-seven percent (67%).

(C) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.

- (D) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (2) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.
- (b) Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1(d)) Lake County Fugitive Particulate Matter Emissions Limitations, fugitive emissions from the oxygen lancing process generating fugitive dust shall comply with the following emissions limitations:
  - (1) 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.
  - (2) 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.

#### D.4.2 Preventive Maintenance Plan

---

A preventive maintenance plan, in accordance with Section B - Preventive Maintenance Plan, of this permit is required for the oxygen lancing building and the associated control devices.

#### **Compliance Determination Requirements**

#### D.4.3 Particulate Matter Control

---

In order to comply with D.4.1, the Permittee shall conduct oxygen lancing process within the building enclosure to control particulate emissions.

## SECTION D.5 FACILITY OPERATION CONDITIONS

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

One (1) chip plant, identified as M059, to be constructed within eighteen (18) months of the issuance of this permit. This chip plant has a maximum capacity of 150 tons per hour, with emissions controlled by slag pre-watering and water sprays, consisting of the following:

- (1) Two (2) screen stations and
- (2) Four (4) conveyers

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

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 326 IAC 2-7-10.5, WITH CONDITIONS LISTED BELOW.

#### D.5.1 Effective Date of the Permit [IC 13-15-5-3]

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

#### D.5.2 Modification to Construction Conditions [326 IAC 2]

All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with processes established for modifications pursuant to 326 IAC 2.

### Operation Conditions

#### D.5.3 Fugitive Dust Emissions Limitations [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1(d)) (Lake County Fugitive Particulate Matter Control Requirements), Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:

- (a) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
- (b) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall not exceed twenty percent (20%) on a three (3) minute average.

### Compliance Determination Requirements

#### D.5.4 Particulate Matter Control

in order to comply with Condition D.5.3, pre-watered slag and water sprays, as necessary, shall be used to control particulate emissions from the screens and conveyor transfer points at all times the screens and conveyors are in operation.

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

#### D.5.5 Visible Emissions Notations

- (a) Visible emission notations of the conveying, screening and drop points shall be performed once per day 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, 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) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, 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.5.6 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.5.5, the Permittee shall maintain records of visible emission notations of the conveying, screening and drop points once per day.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.6

## FACILITY OPERATION CONDITIONS

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

This stationary source also includes the following :

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity of 21,000 gallons, and an approximate throughput of 230,000 gallons per month.
- (b) Storage tanks with capacity of 25,000 gallons and an approximate annual throughput of 250,000 gallons.

(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.6.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

- (a) Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL), that are located in Clark, Floyd, Lake or Porter County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the reporting and record keeping requirements of this rule. The VOL storage vessels are exempted from all other provisions of this rule.
- (b) Pursuant to 326 IAC 8-9-6 (a) and (b), the Permittee of each Volatile Organic Liquid Storage vessel to which 326 IAC 8-9-1 applies shall maintain the following records for the life of the vessel and submit a report to IDEM, OAQ containing the following for each vessel:
  - (1) The vessel identification number,
  - (2) The vessel dimensions, and
  - (3) The vessel capacity.

## SECTION D.7

## FACILITY OPERATION CONDITIONS

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

This stationary source also includes the following specifically regulated insignificant activities:

Gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. (326 IAC 8-9-1)

(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.7.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

- (a) Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL), that are located in Clark, Floyd, Lake or Porter County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the reporting and record keeping requirements of this rule. The VOL storage vessels are exempted from all other provisions of this rule.
- (b) Pursuant to 326 IAC 8-9-6 (a) and (b), the Permittee shall maintain the following records for the life of the stationary storage vessels and submit a report to IDEM, OAQ containing the following for each vessel:
  - (1) The vessel identification number,
  - (2) The vessel dimensions, and
  - (3) The vessel capacity.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: IMS Division, Tube City IMS  
Source Address: One North Broadway, Gary, Indiana 46402  
Mailing Address: 1155 Business Center Drive, Horsham, PA 19044-3454  
Part 70 Permit No.: T089-5630-00132

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: IMS Division, Tube City IMS  
Source Address: One North Broadway, Gary, Indiana 46402  
Mailing Address: 1155 Business Center Drive, Horsham, PA 19044-3454  
Part 70 Permit No.: T089-5630-00132

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

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

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

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

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE AND ENFORCEMENT BRANCH

### Part 70 Quarterly Report

Source Name: International Mill Service, Inc., an on-site Contractor of US Steel -Gary Works  
Source Address: One North Broadway, Gary, IN 46402  
Mailing Address: P.O. Box 444, Gary, IN 46402-0444  
Part 70 Permit No.: T089-5630-00132  
Facility: Slag Processing M057  
Parameter: PM & PM<sub>10</sub>  
Limit: 2.3 million tons slag processed per (12) consecutive months with compliance demonstrated at the end of each month.

QUARTER :

YEAR:

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

No deviation occurred in this quarter.

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

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
 OFFICE OF AIR QUALITY  
 COMPLIANCE AND ENFORCEMENT BRANCH  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: IMS Division, Tube City IMS  
 Source Address: One North Broadway, Gary, Indiana 46402  
 Mailing Address: 1155 Business Center Drive, Horsham, PA 19044-3454  
 Part 70 Permit No.: T089-5630-00132

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

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

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

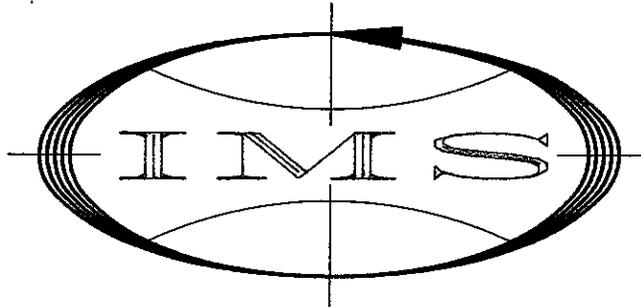
Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**INTERNATIONAL MILL SERVICE  
USS GARY WORKS OPERATION  
PM-10 COMPLIANCE PLANS**

**THIS VOLUME CONTAINS:**

- 1) FUGITIVE EMISSION CONTROL PLAN**
- 2) CONTINUOUS COMPLIANCE PLAN**
- 3) VISIBLE EMISSION EVALUATION PLAN**



**ORBITAL ENGINEERING, INC.**

PITTSBURGH • CHICAGO • CLEVELAND • PHILADELPHIA

# FUGITIVE EMISSION CONTROL PLAN

## INTRODUCTION

This Fugitive Emission Control Plan has been prepared to comply with 326 IAC 6-1-11.1 Lake County PM10 particulate matter control requirements. The Plan covers the operations of International Mill Service, Inc. (IMS) which occur within the facility listed in the regulation as "USS - Gary Works". The regulations defining the required contents of this plan are listed in 326 IAC 6-1-11.1(e) as follows:

e) *Control plans shall include the following:*

- 1) *Within six (6) months of the effective date of this section, a source to which this section applies shall submit a control plan which, when fully implemented, will achieve compliance with the applicable emission limitations stated in subsection (d). Failure to submit a control plan in accordance with this section shall be considered a violation of this rule. A control plan shall also be included as part of a construction permit application pursuant to 326 IAC 2-1.*
- 2) *A control plan, upon submittal to the department, shall become part of a source's operating permit or registration conditions.*
- 3) *The following information:*
  - A) *The name and address of the source and location if the source is located on another source's property.*
  - B) *The name and address, if different from that of the source, of the owner or operator responsible for the execution of the plan.*
  - C) *Identification of the facilities or operations listed in subsection (a)(1) and those affected by section 10.1 of this rule that exist at the source.*
  - D) *A map showing the location of all unpaved roads, paved roads, parking lots, storage piles, material processing facilities, dust handling equipment, material transfer points, and waste disposal and reclamation sites.*
  - E) *A full description of the facilities on the map, including the following information, where applicable:*
    - i) *The road lengths and widths, average daily traffic, surface silt loading, classification of vehicle traffic and other data necessary to estimate PM emissions from paved and unpaved roads and parking lots.*
    - ii) *A description of each storage pile, including the type of material in the pile, its moisture content, the silt content, the throughput, and the equipment used to load onto and load out of the storage piles.*

# FUGITIVE EMISSION CONTROL PLAN

## INTRODUCTION

- iii) *A complete description of the material processing facilities on the plant property, including a material flow diagram of the processing lines, the rated capacity of each piece of equipment, and the existing control equipment and their efficiencies, including the process equipment served.*
- iv) *A complete description of the material transfer, inplant transportation, and dust handling equipment. Material transfer operations shall include, at a minimum, those operations contained in subsection (c)(13).*
- v) *A complete description of all other fugitive particulate matter emitting facilities not covered in this clause.*
- F) *The description of the proposed control measures and practices that the source will employ to achieve compliance with the emission limitations and data that prove its effectiveness.*
- G) *A list of the conditions that will prevent control measures and practices from being applied and alternative control practices and measures that will achieve compliance with the emission limitations.*
- H) *A schedule for achieving compliance with the provisions of the control plan. The schedule shall specify the time required to award necessary contracts and the time required to begin and complete construction and installation. Final compliance shall be achieved no later than December 10, 1993.*
- (4) *The source shall keep the following documentation to show compliance with each of its control measures and control practices:*
  - (A) *A map or diagram showing the location of all emission sources controlled, including the location, identification, length and width of roadways.*
  - (B) *For each application of water or chemical solution to roadways, the following shall be recorded:*
    - (i) *The name and location of the roadway controlled.*
    - (ii) *Application rate.*
    - (iii) *Time of each application.*
    - (iv) *Width of each application.*
    - (v) *Identification of each method of application.*
    - (vi) *Total quantity of water or chemical used for each application.*
    - (vii) *For each application of chemical solution, the concentration and identity of the chemical.*
    - (viii) *The material data safety sheets for each chemical.*

# FUGITIVE EMISSION CONTROL PLAN

## INTRODUCTION

- (C) *For application of physical or chemical control agents not covered by clause (B), the following:*
- (i) *The name of the agent.*
  - (ii) *Location of application.*
  - (iii) *Application rate.*
  - (iv) *Total quantity of agent used.*
  - (v) *If diluted, percent of concentration.*
  - (vi) *The material data safety sheets for each chemical.*
- (D) *A log recording incidents when control measures were not used and a statement of explanation.*
- (E) *Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.*
- (F) *The records required under this subdivision shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by department representatives during working hours.*
- (G) *A quarterly report shall be submitted to the department stating the following:*
- (i) *The dates any required control measures were not implemented.*
  - (ii) *A listing of those control measures.*
  - (iii) *The reasons that the control measures were not implemented.*
  - (iv) *Any corrective action taken.*
- This report shall be submitted to the department thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30 and December 31.*

This Plan is structured in the same form as the rule. Each subsection has a corresponding tab in this plan. An index of the tabs is on the following page. Individual facilities or operations to which each subsection applies are indexed at the beginning of the corresponding tab.

# INDEX

<u>TAB</u>	<u>DESCRIPTION</u>
1	Introduction
2	Index
3A	Location of Source
3B	Address of Owner
3C	List of Facilities
3D	Maps of Facilities
3E(i)	Roadways
3E(ii)	Material Storage Piles
3E(iii)	Material Processing Facilities
3E(iv)	Material Transfer & In-Plant Transportation
3E(v)	Other Facilities
3F	Proposed Control Measures and Practices
3G	Conditions Which Prevent Control
3H	Schedule for Achieving Compliance
4	Documentation, Recordkeeping & Reporting
5	Continuous Compliance Plan
6	Visible Emissions Evaluation Plan
Appendix "A"	Testing Method
Appendix "B"	Test Form
Appendix "C"	Maps (Large Format)
Appendix "D"	MANUFACTURER'S MAINTENANCE INSTRUCTION
APPENDIX "E"	BAGHOUSE CHECKLIST

## **LOCATION OF SOURCE**

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(A) as follows:

*e) Control plans shall include the following:*

*3) The following information:*

*A) The name and address of the source and location, if the source is located on another source's property.*

### REQUESTED INFORMATION:

The address of the source location is as follows:

International Mill Service at USS - Gary Works  
One North Broadway  
Gary, Indiana 46402

IMS is responsible for specific areas within this facility, please refer to the maps in Tab 3D.

## LOCATION OF SOURCE

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(A) as follows:

*e) Control plans shall include the following:*

*3) The following information:*

*A) The name and address of the source and location, if the source is located on another source's property.*

### REQUESTED INFORMATION:

The address of the source location is as follows:

International Mill Service at USS - Gary Works  
One North Broadway  
Gary, Indiana 46402

IMS is responsible for specific areas within this facility, please refer to the maps in Tab 3D.

## LIST OF FACILITIES

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(C) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

C) *Identification of the facilities or operations listed in Subsection (a)(1) and those affected by Section 10.1 of this rule that exist at the source.*

### REQUESTED INFORMATION:

#### IMS FACILITIES WITHIN USS-GARY WORKS

- 1) Main Slag Processing
- 2) Iron Crushing
- 3) Ball Drop
- 4) Tundish Lancing
- 5) Slag Pit - #1 BOP
- 6) Slag Pit - #2 Q-BOP
- 7) Surface Conditioning
- 8) Slab Hauling

## **ADDRESS OF OWNER**

### **APPLICABLE REGULATION FOR PLAN CONTENT:**

326 IAC 6-1-11.1(e)(3)(B) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

*B) The name and address, if different from that of the source, of the Owner or operator responsible for the execution of the plan.*

### **REQUESTED INFORMATION:**

The operator responsible for the facilities described in this Plan is:

International Mill Service, Inc.  
Horsham Business Center  
1155 Business Center Drive, Suite 200  
Horsham, Pennsylvania 19044-3454

## MAPS OF FACILITIES

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(D) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

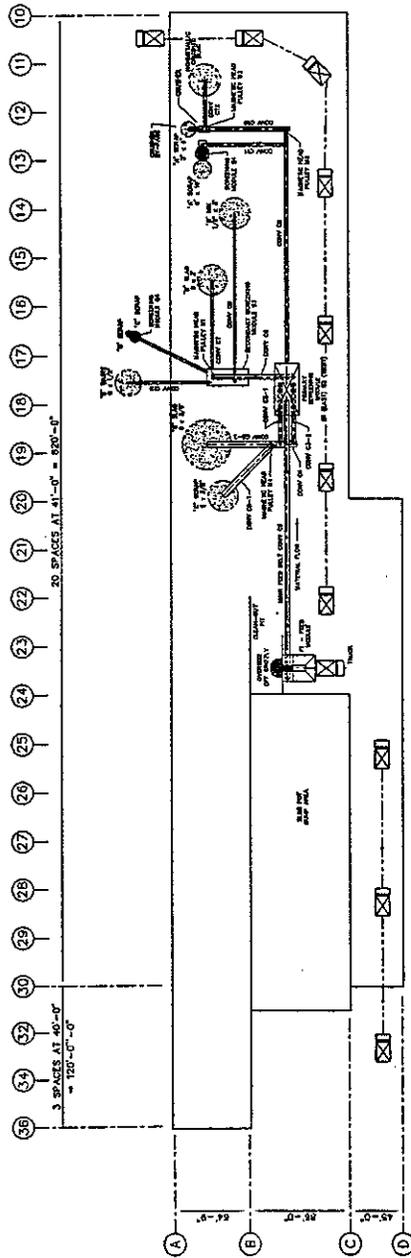
D) *A map showing the location of all unpaved roads, paved roads, parking lots, storage piles, material processing facilities, dust handling equipment, materials transfer points, and waste disposal and reclamation site.*

### REQUESTED INFORMATION:

The following is a list of maps provided to define the location of IMS Facilities within USS - Gary Works. The maps are included in this section in a reduced size. Full size maps are stored in the pockets in the appendix of this Plan.

5041-1	Slag Processing - Equipment Plan
5041-2	Slag Processing - Building Plan
5041-3	Iron Crushing - Equipment Plan
5041-4	Iron Crushing - Building Plan
5041-5	USS Gary Works - IMS Site Plan (Sht 1)
5041-6	USS Gary Works - IMS Site Plan (Sht 2)



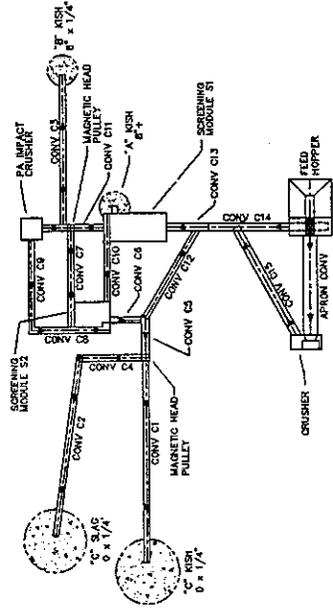


PLAN  
 MO-57 STEEL SLAG PROCESSING PLANT  
 (LOCATED IN FORMER #4 OPEN HEARTH BLDG)

Unit EGT: Dec. 06, 1983

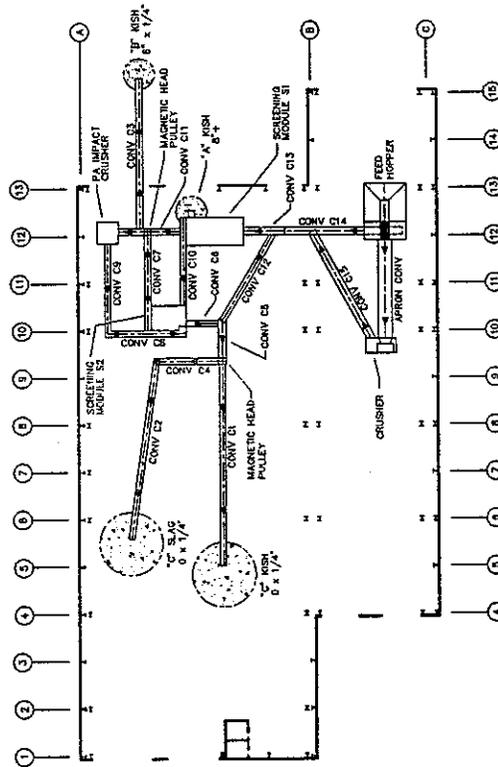
INTERNATIONAL MILL SERVICE	
MIDWEST REGION	
U.S.S. - GARY WORKS	
MAIN SLAG PROCESSING	
SITE PLAN	
DATE	5041-2
BY	
CHECKED BY	
SCALE	

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INTERNATIONAL MILL SERVICE	
MINNEAPOLIS, MINN.	
U.S.S. GARY WORKS	
FLOW DIAGRAM	
DATE	NO. 5041-3
BY	DATE
CHKD BY	DATE
APPROVED BY	DATE

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INTERNATIONAL MILL SERVICE	
MIDWEST REGION	
U.S.S. - GARY WORKS	
SITE PLAN	
DATE: 10/17/61	SCALE: 1"=20'-0"
DRAWN BY: [unintelligible]	CHECKED BY: [unintelligible]
PROJECT NO. 5041-4	

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## ROADWAYS

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(E)(i) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

E) *A full description of the facilities on the map, including the following information, where applicable:*

i) *The road lengths and widths, average daily traffic, surface silt loading, classification of vehicle traffic, and other data necessary to estimate PM, emissions from paved and unpaved roads and parking lots.*

### ROADWAY INDEX

Roadway at #1 BOP Shop Dump Station

Roadway at Slag Processing/#2 Q-BOP Shop Dump Station

Roadway at Ball Drop - Site "C"

Roadway in Slab Laydown Yards

# ROADWAYS

## ROADWAY AT #1 BOP SHOP DUMP STATION

Width: 20 Feet  
Silt Loading: 17% passing 200 mesh

Average Daily Traffic:

Type of vehicle: Pot Hauler  
Trips Loaded (gross weight): 47 (191 Ton)  
Trips Unloaded (net weight): 47 (116 Ton)  
Number of wheels: 8  
Travel Distance: 480 Feet

Type of vehicle: Loader  
Trips Loaded (gross weight): 30 (113 Ton)  
Trips Unloaded (net weight): 42 (98 Ton)  
Number of wheels: 4  
Travel Distance: 90 Feet

Type of vehicle: 35 Ton Truck  
Trips Loaded (gross weight): 46 (81 Ton)  
Trips Unloaded (net weight): 46 (46 Ton)  
Number of wheels: 6  
Travel Distance: 370 Feet

Type of vehicle: 50 Ton Truck  
Trips Loaded (gross weight): 20 (106 Ton)  
Trips Unloaded (net weight): 20 (56 Ton)  
Number of wheels: 6  
Travel Distance: 370 Feet

# ROADWAYS

## ROADWAY AT SLAG PROCESSING/#2 Q-BOP SHOP DUMP STATION

Width: 20 Feet  
Silt Loading: 12.7% passing 200 mesh

Average Daily Traffic:

Type of vehicle: Pot Hauler  
Trips Loaded (gross weight): 47 (191 Ton)  
Trips Unloaded (net weight): 47 (116 Ton)  
Number of wheels: 4  
Travel Distance: 960 Feet

Type of vehicle: Loader  
Trips Loaded (gross weight): 81 (113 Ton)  
Trips Unloaded (net weight): 95 (98 Ton)  
Number of wheels: 4  
Travel Distance: 560 Feet

Type of vehicle: 35 Ton Truck  
Trips Loaded (gross weight): 149 (81 Ton)  
Trips Unloaded (net weight): 149 (46 Ton)  
Number of wheels: 6  
Travel Distance: 3260 Feet

Type of vehicle: 50 Ton Truck  
Trips Loaded (gross weight): 53 (106 Ton)  
Trips Unloaded (net weight): 53 (56 Ton)  
Number of wheels: 6  
Travel Distance: 3260 Feet

# ROADWAYS

## ROADWAY AT BALL DROP - SITE "C"

Width: 20 Feet  
Silt Loading: 8.2% passing 200 mesh

Average Daily Traffic:

Type of vehicle: Loader  
Trips Loaded (gross weight): 60 (113 Ton)  
Trips Unloaded (net weight): 60 (98 Ton)  
Number of wheels: 4  
Travel Distance: 750 Feet

Type of vehicle: 35 Ton Truck  
Trips Loaded (gross weight): 21 (81 Ton)  
Trips Unloaded (net weight): 21 (46 Ton)  
Number of wheels: 6  
Travel Distance: 750 Feet

Type of vehicle: 50 Ton Truck  
Trips Loaded (gross weight): 6 (106 Ton)  
Trips Unloaded (net weight): 6 (56 Ton)  
Number of wheels: 6  
Travel Distance: 750 Feet

# ROADWAYS

## ROADWAY AT SLAB LAYDOWN YARDS

Width:	20 Feet
Silt Loading:	9.1% passing 200 mesh

### Average Daily Traffic in H Yard (includes CY, HY & RJ)

Type of vehicle:	Slab Hauler
Trips Loaded (gross weight):	120 (121 Ton)
Number of wheels:	6
Travel Distance:	1000 Feet

### Average Daily Traffic in P Yard (includes PY)

Type of vehicle:	Slab Hauler
Trips Loaded (gross weight):	180 (121 Ton)
Number of wheels:	6
Travel Distance:	1150 Feet

### Average Daily Traffic in Yard 80 (includes 80)

Type of vehicle:	Slab Hauler
Trips Loaded (gross weight):	60 (121 Ton)
Number of wheels:	6
Travel Distance:	1150 Feet

## **MATERIAL PROCESSING FACILITIES**

### **APPLICABLE REGULATIONS FOR PLAN CONTENT:**

326 IAC 6-1-11.1(e)(3)(E)(iii) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

E) *A full description of the facilities on the map, including the following information, where applicable:*

iii) *A complete description of the material processing facilities on the plant property, including a material flow diagram of the processing lines, the rated capacity of each piece of equipment, and the existing control equipment and their efficiencies, including the process equipment served.*

### **MATERIAL PROCESSING FACILITIES INDEX**

Main Slag Processing

Iron Crushing

Tundish Lancing

Slag Pits at #1 BOP Shop and #2 Q-BOP Shop

Ball Drop

Surface Conditioning

## MATERIAL PROCESSING FACILITIES

### NAME:

### MAIN SLAG PROCESSING

### DESCRIPTION:

This area processes slag from steelmaking operations. Slag is delivered by truck to a feed hopper station. The material travels across a grizzly which removes +10" material. This material is sent to the ball drop area for further processing. The remaining material is elevated by conveyor belt to the screening station. The screening station consists of two multi-deck screens operating in parallel. The screens separate the material into three sizes: "A" - +3", "B" - 3" x 3/8", and "C" - 3/8" x 0". It is important to limit the moisture content of this material for proper screening. The sized material travels on a series of conveyor belts equipped with magnetic head pulleys which separate each size into magnetic material (scrap) and non-magnetic material (slag). The "B" material is rescreened to further eliminate fine material. The finished products are discharged to stock piles. When a sufficient amount is accumulated it is loaded into trucks for delivery to be reused in production operations.

### EQUIPMENT CAPACITIES:

1)	Simplicity Feeder	600 tph
2)	6' x 20' - 3 deck screens	300 tph ea.
3)	6' x 16' - 2 deck screens	300 tph
4)	4' x 16' - 2 deck screens	100 tph
5)	5' x 10' - 1 deck screen	150 tph
6)	jaw crusher	125 tph

### APPLICABLE REGULATIONS:

326 IAC 6-1-10.1(p)(3)(F)(i) as follows:

- (F) *Waste disposal and recycling practices of iron and steel scrap and other metallic scrap shall comply with the following:*
- (i) *Provide a description of the routine activities involving disposal and reclamation of iron and steel. The visible emissions from such activities shall not exceed twenty percent (20%) opacity on a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*

### EMISSION LIMIT:

20% opacity - 3 minute average



## MATERIAL PROCESSING FACILITIES

### NAME:

#### IRON CRUSHING

### DESCRIPTION:

The Iron Crushing Operation processes high iron content slags and spills from steelmaking operations so that the material is of acceptable size to be recycled into the steelmaking operation. This material consists mostly of iron and steel with a small amount of slag mixed into it. This operation is housed in a building.

The Iron Crushing operation consists of the following steps. Material is recovered from outdoor storage piles by front end loaders and dumped into a feed hopper inside the building. The material passes over a grizzly to separate oversize material. The oversize material passes through a jaw crusher which achieves primary size reduction, then rejoins the balance of the feed material. The material then passes through a screening station. Oversize material is separated and piled. Material which passes through the first screening station, is conveyed to a hammermill and then to a second screening station. Larger material from this screening station is conveyed across a magnetic head pulley. The magnetic (metallic) portion of the material is stockpiled outdoors by conveyor. This is the primary finished product of the process, 6" x 1/4" Iron. Material which is not magnetically separated is returned to the hammermill for further processing. The material which passes through the second screening station is magnetically separated and stockpiled indoors as 1/4" x 0" Iron (metallic) or 1/4" x 0" slag.

The oversize material from the first screening operation is removed to outdoor storage piles. All of this material is +6" in size and has been screened so that it contains no dust. The outdoor piles are managed by a crane equipped with an electromagnet. The crane uses an Iron Screening Grate to further separate the material into 6" x 8" and +8" sizes. Oversize material is returned to the initial feed hopper for further crushing. This process is repeated until all of the material is an acceptable maximum size for recycling.

### EQUIPMENT CAPACITY:

The capacities of the equipment in this operation are as follow:

- |    |                                  |               |
|----|----------------------------------|---------------|
| 1) | Simplicity Grizzly Feeder        | 600 tph       |
| 2) | A-C Jaw Crusher                  | 150 tph       |
| 3) | Simplicity 6'x20'-3 deck screens | 250 tph       |
| 4) | Simplicity 5'x16'-2 deck screens | 150 tph       |
| 5) | Pennsylvania Hammermill          | 75 tph        |
| 6) | Jaw Crusher                      | not installed |
| 7) | Iron Screening Grate             | 12.5 tph      |

## **MATERIAL PROCESSING FACILITIES**

NAME:

### **IRON CRUSHING**

APPLICABLE REGULATIONS:

326 IAC 6-1-10.1(p)(3)(F)(i) as follows:

- (F) *Waste disposal and recycling practices of iron and steel scrap and other metallic scrap shall comply with the following:*
  - (i) *Provide a description of the routine activities involving disposal and reclamation of iron and steel. The visible emissions from such activities shall not exceed twenty percent (20%) opacity on a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*

EMISSION LIMIT:

20% opacity - 3 minute average



## MATERIAL PROCESSING FACILITIES

### NAME:

TUNDISH LANCING

### DESCRIPTION:

IMS is responsible for recycling of the skulls which form in the tundishes during steel casting operations. Skulls are solid masses of steel weighing several tons. To be recycled they must be reduced to pieces of approximately 24 inches or less. This reduction is done in stages. Lancing is the first step. In the lancing step, each tundish skull has notches cut in several places. The lancing is done using conventional oxygen lances. It is followed by Ball Drop to break the pieces and delivered to Melt Shop.

From a regulatory viewpoint, this operation is covered by both 326 IAC 6-1-10.1 and 11.1. Lancing operations are specifically listed in 10.1(p)(3)(F)(iii). As presently practiced the operation also meets the definition of "fugitive particulate matter" under 11.1(b)(9). The allowable limit in both cases is 20% opacity on a three (3) minute average.

### EQUIPMENT CAPACITY:

(3) Lancing Stations

### APPLICABLE REGULATIONS:

326 IAC 6-1-10.1(p)(3)(F)(iii) as follows:

- (F) *Waste disposal and recycling practices of iron and steel scrap and other metallic scrap shall comply with the following:*
  - (iii) *Emissions from all steel scrap burning or cutting and oxygen lancing operations shall not exceed twenty percent (20%) opacity on a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*

## MATERIAL PROCESSING FACILITIES

NAME:

**TUNDISH LANCING**

APPLICABLE REGULATIONS:

Also, 326 IAC 6-1-11.1(c)(9) and (d)(9) as follows:

- c) *The following definitions apply throughout this section:*
  - (9) *"Fugitive particulate matter" means any particulate matter emitted into the atmosphere other than through a stack.*
- d) *The following are particulate matter emission limitations:*
  - (9) *Any facility or operation not specified in this subsection shall meet a twenty percent (20%), three (3) minute opacity standard. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9\*\*\* except that the opacity standard shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals. Compliance of any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded in fifteen (15) second intervals for the duration of the operation.*

EMISSION LIMIT:

20% opacity - 3 minute average

# MATERIAL PROCESSING FACILITIES

## NAME:

SLAG PITS #1 BOP SHOP AND #2 Q-BOP SHOP

## DESCRIPTION:

Molten slag from steelmaking is collected by US Steel in slag pots. IMS is responsible for recovering these pots and transports them using special rubber-tired vehicles to the adjacent slag pot operations where they are dumped into the pits. In the pits the molten slag is allowed to cool and solidify. Water sprays are used to enhance cooling and to control dusting. Once solidified the slag, which is still quite hot, is removed from the pits for further cooling by front end loaders. When the slag has cooled sufficiently to be safely handled in the main slag processing plant conveyor system, it is loaded into trucks by front end loaders.

## EQUIPMENT CAPACITY:

The capacities of the equipment in this operation are as follows:

Front End Loaders	12 cu. yd. bucket
Trucks	30 or 50 ton

## APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(d)(3)(c)(i) and (ii) and (d)(9) as follows:

- (d) *The following are particulate matter emission limitations:*
  - (3) *Material transfer limits shall be as follows:*
    - (C) *Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:*
      - (i) *The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.*
      - (ii) *The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in subdivision (9).*

## MATERIAL PROCESSING FACILITIES

NAME:

SLAG PITS #1 BOP SHOP AND #2 Q-BOP SHOP

APPLICABLE REGULATIONS:

- (9) *Any facility or operation not specified in this subsection shall meet a twenty percent (20%), three (3) minute opacity standard. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9\*\*\* except that the opacity standard shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals. Compliance of any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded at fifteen (15) second intervals for the duration of the operation.*

EMISSION LIMITS:

From pots into pits - 20% opacity - six minute average.

From pits into trucks - 20% opacity - three minute average.

# MATERIAL PROCESSING FACILITIES

## NAME:

**BALL DROP**

## DESCRIPTION:

The function of the Ball Drop facility is to reduce the size of materials that are too large to be processed through conventional screening/crushing equipment. The process consists of dropping a large steel ball on the material to crack and break it. The process continues until the desired degree of size reduction is achieved. Material is delivered to the site by truck. Cranes fitted with electro-magnets are used to lift and drop the steel balls. The cranes are also used to load magnetic material into trucks for shipment to the Melt Shop.

## EQUIPMENT CAPACITY:

(7) Ball Drop Stations

## APPLICABLE REGULATIONS:

326 IAC 6-1-10.1(p)(3)(F)(i) as follows:

- (F) *Waste disposal and recycling practices of iron and steel scrap and other metallic scrap shall comply with the following:*
- (i) *Provide a description of the routine activities involving disposal and reclamation of iron and steel. The visible emissions from such activities shall not exceed twenty percent (20%) opacity in a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*

## EMISSION LIMIT:

20% opacity - 3 minute average

# MATERIAL PROCESSING FACILITIES

## NAME:

### SURFACE CONDITIONING

## DESCRIPTION:

The surface conditioning facility removes surface defects from steel slabs before they are rolled to finished size. The conditioning equipment consists of a scarfing torch mounted on a robotic arm. The slab being conditioned is carried on a rail mounted car. The operation is housed in an enclosed area with a capture system connected to a dust collection system. The dust is collected in an adjacent baghouse. A series of screw conveyors carries the dust to tote bins. The tote bins are removed by others.

The material removed by the scarfing torch (swarf) falls into a water-filled trench where it solidifies. Periodically, it is removed to a pile outside of the building. This material consists of small pellets formed by cooling of the molten steel and contains no dust.

Surface conditioning operations are not specifically covered under Section 6-1-10.1 of the regulations. A continuous compliance plan has been prepared for the associated baghouse. Surface conditioning is included in Section 6-1-11.1 because the dust collected in the baghouse falls under that regulation.

## EQUIPMENT CAPACITY:

Baghouse 90,000 ACFM @ 150°F

## APPLICABLE REGULATIONS:

326 IAC 5-1-2(2)(B) as follows:

*Sec. 2. Visible emissions from a source or facility shall not exceed any of the following limitations, and unless otherwise stated, all visible emissions shall be observed in accordance with the procedures set forth in Section 4 of this rule:*

*(2) Sources or facilities of visible emissions located in the areas listed in section 1(c) of this rule shall meet the following limitations:*

*(B) Visible emissions from a facility located in Lake County shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings unless otherwise specified in 326 IAC 6-1-10.1. This visible emission limit shall supercede [sic.] the visible emissions limit contained in clause (A).*

# MATERIAL PROCESSING FACILITIES

NAME:

## SURFACE CONDITIONING

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(c)(7) and (d)(8) as follows:

(c) *The following definitions apply throughout this section:*

(7) *"Dust handling equipment" means the equipment used to handle dust collected by control equipment, such as, but not limited to, a conveyor used to transfer dust from a control equipment hopper to a temporary storage container. A truck is an example of a temporary storage container. Both a conveyor and temporary storage container, in this case, are dust handling equipment.*

(d) *The following are particulate emission limitations:*

(8) *Dust handling equipment. The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%). Compliance with this standard shall be determined by 40 CFR 60, Appendix A, Method 9\*\*\*.*

### EMISSION LIMIT:

Stack - 20% opacity - 3 minute average

Dust handling equipment - 10% opacity - 3 minute average

## MATERIAL TRANSFER & INPLANT TRANSPORTATION

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(e)(3)(E)(ii) and (c)(10) and (13) as follows:

- e) *Control plans shall include the following:*
  - 3) *The following information:*
    - E) *A full description of the facilities on the map, including the following information, where applicable:*
      - iv) *A complete description of the material transfer, inplant transportation, and dust handling equipment. Material transfer operations shall include, at a minimum, those operations contained in Subsection (c)(13).*
- c) *The following definitions apply throughout this section:*
  - (10) *"Inplant transportation" means transportation of material on plant transportation routes, such as railroads and plant roads, in equipment such as trucks, railroad cars, front end loaders, conveyors, and skip hoists. The inplant transportation might be from one (1) process to another, from process equipment to waste disposal and reclamation sites, or from one (1) storage pile to another. This includes, for example, hauling of slag from slag pits to the slag processing facility on the plant property.*
  - (13) *"Material transfer" means the transfer of material from process equipment onto the ground, from the ground into hauling equipment, from hauling equipment onto a storage pile, from a storage pile into hauling equipment transport, or into an initial hopper for further processing. Dumping of slag from blast furnaces or basic oxygen furnaces into the slag pits and subsequent transfer to the hauling vehicle and initial hopper at the slag processing facility is an example of material transfer.*

### MATERIAL TRANSFER INDEX

Main Slag Processing

Iron Crushing

Ball Drop

Slag Pits for #1 BOP Shop and #2 Q-BOP Shop

Surface Conditioning

## **MATERIAL TRANSFER & INPLANT TRANSPORTATION**

### **NAME:**

#### **MAIN SLAG PROCESSING**

### **DESCRIPTION:**

All materials in the Main Slag Processing area are recovered from stockpiles by front end loaders and loaded into trucks for delivery. The trucks carrying finished materials are operated by US Steel and the materials become their responsibility at that point. Material recovered from the crusher is loaded into IMS trucks and is dumped into the system feed hopper for reprocessing. Material recovered from the grizzly is sent by IMS truck to the Ball Drop area for further size reduction. The primary feed to the system is IMS trucks which are loaded in the slag pot dumping stations.

### **OPERATIONS COVERED:**

The following facets of this operation fall under the classification of material transfer:

- 1) Loading of "C" Slag into trucks
- 2) Loading of "C" Scrap into trucks
- 3) Loading of unscreened material into trucks
- 4) Dumping of trucks into the feed hopper

The following facets of this operation fall under the classification of inplant transportation:

- 1) Trucking of crushed slag from the crusher to the feed hopper.
- 2) Trucking of unscreened material to the Ball Drop area.

As shown in the data presented in the section on Material Storage Piles, only the above materials meet the definition of a "material" under the fugitive emission regulations.

# MATERIAL TRANSFER & INPLANT TRANSPORTATION

NAME:

## MAIN SLAG PROCESSING

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(c)(11) and (d)(3)(B) and (d)(6)(A) as follows:

- (c) *The following definitions apply throughout this section:*
  - (11) *"Material" means raw process material, byproduct, intermediate product, waste product, final product, and dust collected by control equipment, having proportion of loose, dry dust equal to or greater than five-tenths percent (0.5%) as measured by the ASTM C-136 method\*\*, having potential to emit particulate emissions when disturbed by transfer, processing, and transportation activities defined in this section.*
- (d) *The following are particulate matter emission limitations:*
  - (3) *Material transfer limits shall be as follows:*
    - (B) *Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in subsection (c) or material transfer for transportation within or outside the source property.*

*Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded at fifteen (15) second intervals for the duration of the operation.*
  - (6) *Material transportation activities shall include the following:*
    - (A) *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. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22\*\*\*, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car.*

### EMISSION LIMITS:

Material Transfer - 10% opacity - 3 minute average, or duration of operation  
Inplant Transportation - 0% opacity

# **MATERIAL TRANSFER & INPLANT TRANSPORTATION**

NAME:

## **IRON CRUSHING**

DESCRIPTION:

Material is delivered to the Iron Crushing Operation in trucks and dumped in piles outside of the building. All intermediate moves during processing are done by front end loader. Large pieces of iron pass through the process several times during which they are reduced in size by a crusher, then screened. Since they are screened last, this material is dust free. Loading of finished products into trucks is done by front end loader including the 1/4" x 0" slag and 1/4" x 0" iron.

OPERATIONS COVERED:

The following facets of this operation fall under the classification of material transfer:

- 1) Dumping of new material on-site.
- 2) Loading of new material into feed hopper by front end loader.
- 3) Loading of trucks by front end loader with 1/4" x 0" slag and iron.

As shown in the data presented in the section on Material Storage Piles, only the above materials meet the definition of a "material" under the fugitive emission regulations.

# MATERIAL TRANSFER & INPLANT TRANSPORTATION

NAME:

## IRON CRUSHING

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(c)(11) and (d)(3)(B) and (d)(6)(A) as follows:

- (c) *The following definitions apply throughout this section:*
- (11) *"Material" means raw process material, byproduct, intermediate product, waste product, final product, and dust collected by control equipment, having proportion of loose, dry dust equal to or greater than five-tenths percent (0.5%) as measured by the ASTM C-136 method\*\*, having potential to emit particulate emissions when disturbed by transfer, processing, and transportation activities defined in this section.*
- (d) *The following are particulate matter emission limitations:*
- (3) *Material transfer limits shall be as follows:*
- (B) *Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in subsection (c) or material transfer for transportation within or outside the source property.*
- Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded at fifteen (15) second intervals for the duration of the operation.*
- (6) *Material transportation activities shall include the following:*
- (A) *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. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22\*\*\*, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car.*

### EMISSION LIMITS:

Material Transfer - 10% opacity - 3 minute average, or duration of operation  
Inplant Transportation - 0% opacity

## **MATERIAL TRANSFER & INPLANT TRANSPORTATION**

### **NAME:**

### **BALL DROP**

### **DESCRIPTION:**

All material processed in the Ball Drop area is delivered and removed by truck. The trucks are loaded in two ways. Magnetic material is picked up by the electromagnets on the cranes and loaded into trucks. Non-magnetic material is loaded into trucks by front end loader.

### **OPERATIONS COVERED:**

The following facets of this operation fall under the classification of material transfer:

- 1) Dumping of material to be processed from trucks.
- 2) Loading of material into trucks by electromagnet.
- 3) Loading of material into trucks by front end loader.

The following facets of this operation fall under the classification of inplant transportation:

- 1) Trucking of oversized materials from various points in the plant.
- 2) Trucking of metallic material to the iron crushing operation.
- 3) Trucking of material to the slag processing operation.

# MATERIAL TRANSFER & INPLANT TRANSPORTATION

NAME:

## BALL DROP

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(c)(11) and (d)(3)(B) and (d)(6)(A) as follows:

(c) *The following definitions apply throughout this section:*

(11) *"Material" means raw process material, byproduct, intermediate product, waste product, final product, and dust collected by control equipment, having proportion of loose, dry dust equal to or greater than five-tenths percent (0.5%) as measured by the ASTM C-136 method\*\*, having potential to emit particulate emissions when disturbed by transfer, processing, and transportation activities defined in this section.*

(d) *The following are particulate matter emission limitations:*

(3) *Material transfer limits shall be as follows:*

(B) *Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in subsection (c) or material transfer for transportation within or outside the source property.*

*Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded at fifteen (15) second intervals for the duration of the operation.*

(6) *Material transportation activities shall include the following:*

(A) *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. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22\*\*\*, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car.*

### EMISSION LIMITS:

Material Transfer - 10% opacity - 3 minute average, or duration of operation

Inplant Transportation - 0% opacity

## **MATERIAL TRANSFER & INPLANT TRANSPORTATION**

### **NAME:**

### **SLAG PITS FOR #1 BOP SHOP AND #2 Q-BOP SHOP**

### **DESCRIPTION:**

Slag pots are picked up by special carrier vehicles and transported to the respective slag pits. The pots are dumped into the pits. The empty pots are returned to the steel shops for reuse. When the molten slag in the pits has cooled enough to solidify, it is removed from the pits by front end loader and stacked in an adjacent area to allow it to cool further. When cooled sufficiently for further processing, the slag is loaded into trucks by front end loaders for transport to the Main Slag Processing area.

### **OPERATIONS COVERED:**

The following facets of this operation fall under the classification of material transfer:

- 1) Dumping of slag pots into pits
- 2) Piling of slag by front end loaders
- 3) Loading of trucks by front end loaders

The following facets of this operation fall under the classification of inplant transportation:

- 1) Hauling of slag pots to slag pits.
- 2) Trucking of slag to processing facility.

# MATERIAL TRANSFER & INPLANT TRANSPORTATION

NAME:

## SLAG PITS FOR #1 BOP SHOP AND #2 Q-BOP SHOP

### APPLICABLE REGULATIONS:

326 IAC 6-1-11.1(d)(3)(C)(i), (ii) and (d)(6)(A) and (d)(9) as follows:

- (d) *The following are particulate matter emission limitations:*
  - (3) *Material transfer limits shall be as follows:*
    - (C) *Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:*
      - (i) *The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.*
      - (ii) *The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in subdivision (9).*
  - (6) *Material transportation activities shall include the following:*
    - (A) *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. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22\*\*\*, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car.*
  - (9) *Any facility or operation not specified in this subsection shall meet a twenty percent (20%), three (3) minute opacity standard. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9\*\*\*, except that the opacity standard shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals. Compliance of any operation lasting less than three (3) minutes shall be determined as an average of consecutive observations recorded at fifteen (15) second intervals for the duration of the operation.*

### EMISSION LIMITS:

Pots to Pits - 20% opacity - 6 minute average  
Pits to Trucks - 20% opacity - 3 minute average  
Inplant Transportation - 0% opacity

# MATERIAL TRANSFER & INPLANT TRANSPORTATION

## NAME:

**SURFACE CONDITIONING**

## DESCRIPTION:

The Surface Conditioning operation includes a dust collection system with a baghouse. Dust collected in the baghouse is placed in totes.

## OPERATIONS COVERED:

There are no activities in this operation that fall under the classification of material transfer.

The inplant transportation of the material is performed by others.

## APPLICABLE REGULATIONS:

NONE

## EMISSION LIMITS:

NOT APPLICABLE

**OTHER FACILITIES:**

APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(E)(v) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

E) *A full description of the facilities on the map, including the following information, where applicable:*

v) *A complete description of all other fugitive particulate matter emitting facilities not covered in this clause.*

REQUESTED INFORMATION:

**There are no such facilities under IMS control.**

# PROPOSED CONTROL MEASURES AND PRACTICES

## APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1(e)(3)(F) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

F) *The description of the proposed control measures and practices that the source will employ to achieve compliance with the emission limitations and data that proves its effectiveness.*

### PROPOSED CONTROL MEASURE INDEX

Main Slag Processing

Iron Crushing

Ball Drop

Tundish Lancing

Slag Pits #1 BOP Shop and #2 Q-BOP Shop

Surface Conditioning

Roadways

155

## **SCHEDULE**

### APPLICABLE REGULATION FOR PLAN CONTENT:

326 IAC 6-1-11.1 (e)(3)(H) as follows:

e) *Control plans shall include the following:*

3) *The following information:*

H) *A schedule for achieving compliance with the provisions of the control plan. The schedule shall specify the time required to award necessary contracts and the time required to begin and complete construction and installation. Final compliance shall be achieved no later than December 10, 1993.*

### REQUESTED INFORMATION:

The compliance date coincides with the required submission date of this Plan. This negates the value of supplying a schedule for achieving compliance with this Plan.

## **PROPOSED CONTROL MEASURES AND PRACTICES**

**NAME:**

### **MAIN SLAG PROCESSING**

**DESCRIPTION:**

The material processed through this facility has a moisture content which helps in controlling the amount of fugitive emissions during processing. However, if the moisture level gets too high the material cannot be screened properly. Control measures in this area are based on the use of water sprays. These sprays are directed at the dust being emitted from specific points within the process. The purpose is to agglomerate the dust particles so they settle more quickly. The system also has sprays which can be used to wet the material when this can be done without interfering with the screening process.

The water distribution system is fitted with flow meters. The meters are checked weekly by the visual emissions observer. In this way he can correlate the flow rate to the effectiveness of the dust suppression system.

## PROPOSED CONTROL MEASURES AND PRACTICES

### NAME:

**IRON CRUSHING**

### DESCRIPTION:

The material processed through this facility has a significant moisture content which helps in controlling the amount of fugitive emissions during processing. However, if the moisture level gets too high the material cannot be screened properly. Control measures in this area are based on the use of water sprays. These sprays are directed at the dust being emitted from specific points within the process. The purpose is to agglomerate the dust particles so they settle more quickly. The system also has sprays which can be used to wet the material when this can be done without interfering with the screening process.

The water distribution system is fitted with flow meters. The meters are checked weekly by the visual emission observer. In this way he can correlate the flow rate to the effectiveness of the dust suppression system.

## PROPOSED CONTROL MEASURES AND PRACTICES

NAME:

**BALL DROP**

DESCRIPTION:

Dust suppression in the Ball Drop area will be accomplished by applying water to the material being processed. Because this operation is totally outdoors, conditions will vary widely. Operating personnel will be trained to recognize unacceptably high dust levels and will react by applying water using hoses.

## PROPOSED CONTROL MEASURES AND PRACTICES

NAME:

TUNDISH LANCING

DESCRIPTION:

IMS plans to relocate to the #4 Open Hearth Building to control emissions from tundish lancing operations. Details of the control scheme, as well as any associated permit applications, will be filed as soon as the final plans are developed.

## PROPOSED CONTROL MEASURES AND PRACTICES

NAME:

### ROADWAYS

DESCRIPTION:

The roadways for which IMS is responsible are limited to those which are within their operating areas. All of these roads are unpaved. Dust control is accomplished through the service of a subcontractor who applies water using sprays mounted on tank trucks. This program has been in place for over five years. Historically, IMS has learned that the use of dust suppressant chemicals does not benefit this process. The weight of the large vehicles used in their operations negates the agglomeration of fine particles which the chemicals application is designed to effect within the road surface.

## **PROPOSED CONTROL MEASURES AND PRACTICES**

**NAME:**

**SLAG PITS - #1 BOP SHOP AND #2 - Q-BOP SHOP**

**DESCRIPTION:**

Visual readings of these activities are within the limits allowed in the regulations.

## PROPOSED CONTROL MEASURES AND PRACTICES

NAME:

### SURFACE CONDITIONING

DESCRIPTION:

Surface conditioning activities do not generate any fugitive emissions. All emissions are captured and processed through a baghouse. A detailed CCP for operation and maintenance of the baghouse has been prepared and is contained in this document.

# IMS DAILY INSPECTION SHEET

1 Photohelic Gauge Reading

Range set

HIGH

LOW

2 Fan Amperage Reading

AMPS

3 Cleaning Cycle Working?

YES

NO

4 Compressed Air (Mill Incoming)

psi

5 Dust Discharge Working?

YES

NO

6 Dust Discharged?

YES

NO

7 Visual Inspection

YES

NO

8a Excessive Noise?

YES

NO

8b If Yes, What?

INSPECTED BY:

DATE:

COMMENTS:



# INTERNATIONAL MILL SERVICE MONTHLY INSPECTION OF BAGHOUSE

- A BAG SEATING CONDITION
- B MOVING PARTS ON SHAKER
- C FAN CORROSION & BLADE WEAR
- D HOSE & CLAMPS
- E HOLES OR LEAKS IN BAGS
- F BAG HOUSING FOR CORROSION

	OK	REPLACE	COMMENTS	CHAMBER
A				
B				
C				
D				
E				
F				

INSPECTED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

COMMENTS:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# INTERNATIONAL MILL SERVICE QUARTERLY INSPECTION OF BAGHOUSE

	OK	REPLACE	COMMENTS	CHAMBER
A BAGS				
B DUCTS FOR BUILD UP OF DUST DAMPER VALVES				
C FOR PROPER SEATING				
D DOOR GASKETS				
E BAFFLE PLATE FOR WEAR				

INSPECTED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

COMMENTS:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

# INTERNATIONAL MILL SERVICE ANNUAL INSPECTION OF BAGHOUSE

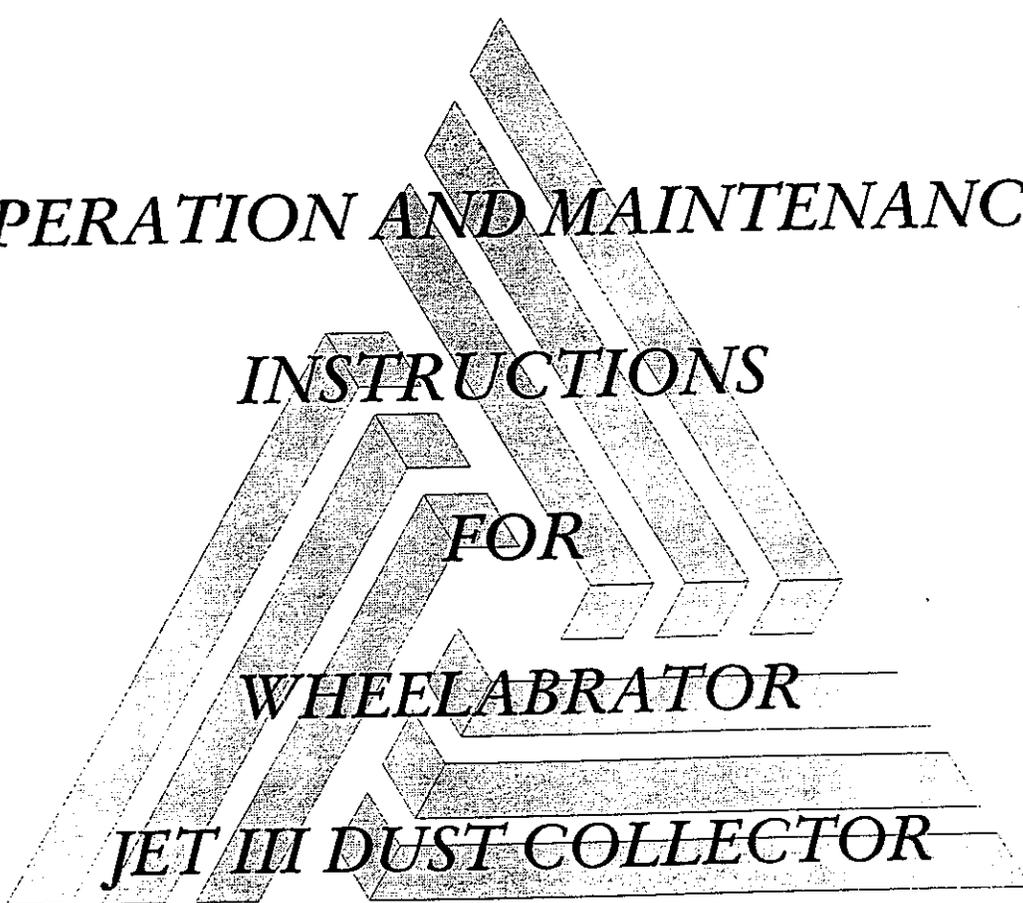
- WELDS ON STRUCTURE
- A BOLTS ON STRUCTURE
  
- B HOPPERS FOR WEAR
  
- C CLEANING PARTS FOR WEAR

OK	REPLACE	COMMENTS	CHAMBER

INSPECTED BY: \_\_\_\_\_

DATE: \_\_\_\_\_

COMMENTS:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



*OPERATION AND MAINTENANCE*

*INSTRUCTIONS*

*FOR*

*WHEELABRATOR*

*JET III DUST COLLECTOR*

## SAFETY INSTRUCTIONS

### DUST COLLECTORS AND VENTILATION

With all types of dust collectors, it is important that the dust hoppers discharge dust on a continuous basis. Many dusts due to their chemical and physical properties have the potential to be easily ignited when left stored. The hazards of fires and explosions are minimized when the dust is discharged from the dust collector hoppers on a continuous basis.

### WARNING

In applications involving the use of *EXPLOSIVE DUST*, measures must be taken to minimize the risk of dust collector fires and/or explosions.

1. The dust collector refuse hopper(s) must be emptied on a continuous basis.
2. The process equipment and dust collector must be grounded where applicable to minimize static electric charges, which could produce sparks.
3. In some cases, the risk of fire/explosion can be reduced by adding No. 200 Mesh Agricultural Limestone ( $\text{CaCO}_3$ ) to the ventilation system at a continuous rate of approximately 0.2 oz. per hour per square foot of filter area.
4. Equipment must be located, and explosion doors vented, in accordance with governing codes.

### CAUTION

( $\text{CaCO}_3$ ) is crushed limestone rock (not to be confused with lime, otherwise known as hot lime, burnt lime, or hydrated lime). Under **NO** circumstances should these highly reactive lime products be used.

## THEORY OF OPERATION

### FOR JET III PULSE TYPE DUST COLLECTOR

The *Jet III Pulse Jet Dust Collector* is a continuous automatic, suction or pressure type dust collector capable of filtering dust laden air through a needled felt or woven (glass) felt filter media.

This dust collector is used for the dry filtration of solids/fumes suspended in gas. Solids/fumes are collected on the outside of the filter tubes as the gas passes through them.

The dirty or contaminated gas enters the dust collector through the module inlet, striking a baffle plate which distributes the gas uniformly throughout the housing and drops out heavy particulate into the hopper. The "dust carrying" gas then passes through the filterbags which retain the dust particles on the exterior surface while allowing the carrying gas to pass through to the module outlet.

As the collector operates, the collected dust begins to form a dust cake which eventually diminishes the porosity of the filter. This reduction in porosity is measured by a magnehelic gauge and is defined as the dust collector pressure drop or differential pressure. As the pressure drop increases, the system static loss will increase, decreasing the ventilating gas volume.

To maintain a moderate pressure drop, and the system design volume, a cleaning cycle is employed to provide continuous cleaning of the filterbags. The cleaning system consists of a solid state timer which actuates electric solenoids governing the air valves. These air valves deliver a momentary burst or pulse of high pressure compressed air through the manifold pipe and into the venturis. The venturis, natural jet pumps induce secondary air several times the original volume and create a reverse air flow through the filterbags to provide necessary cleaning.

This cleaning procedure occurs on a row by row basis, therefore, the momentary interruption of gas flow is unnoticeable allowing continuous ventilation.

The dust cake, when pulsed from the filterbags, falls directly into the hopper where it is discharged into a dust removal system.

■

## STANDARD PROCEDURE FOR ERECTION OF JET III DUST COLLECTOR

### FORWARD

With the proper care and attention, your machine will provide maximum performance and long service, and we are sure that it will prove to be one of your most valued assets.

Our interest in the successful operation of your machine continues throughout the life of the machine. We want it to serve you well. For that reason, please feel free to discuss any problem that you may have concerning it or the work that you are doing. It will be a pleasure to help you.

The purpose of this manual is to assist you in keeping the equipment in the best possible operating and mechanical condition at all times.

This manual contains instructions on the proper care and operation of your equipment. If followed, they will help you greatly in getting the most production and satisfaction from the machine, plus, drawings and part numbers are included for accurately ordering repairs.

To make sure that your parts order is properly filled, please observe ordering instructions

---

The following instructions concern erection procedures for a typical Jet III unit. For the specific arrangement of the equipment purchased, please see the General Arrangement.

### 1.0 FOUNDATION

1.1. The foundation should be prepared according to the anchor bolt layout, which is usually found on the General Arrangement drawing. Piers, or slabs, are to be designed by the Customer to suit loadings of the unit as indicated on the above drawings and by soil conditions.

### 2.0 ERECTION

2.1 After verifying that foundation dimensions are accurate to within  $\pm 1/8"$ , bolt the support columns to the anchor bolts. Erect the rest of the support steel, tightening the bolts only enough to hold the columns in an upright position until the module is installed.

Level and square the framework with shims under the base plates if necessary, then tighten all bolts and ground under the base plates.

**NOTE 1:** It is essential that all pieces of support steel (i.e., columns, beams, bracing, etc.) be erected before setting any piece of the collector.

**NOTE 2:** All high strength bolts shall be installed in accordance with the specifications for structural joints using ASTM A-325 bolts. The tightening mechanism used shall be either a torque wrench, a properly calibrated impact wrench, or the turn of the nut method.

**NOTE 3:** Although all components are closely monitored during fabrication to ensure conformance to tolerances; transportation and handling in the field may necessitate some final adjustment to such items as access doors, etc. On larger units, a backing plate may be required on field splices. Should this be the case it is our recommendation that these be welded on the interior of the unit. (Material and labour by others).

2.2 Set module into place on the support steel and bolt in loosely. Make sure entire structure is level and square; then tighten bolts to the proper pre-tension loads. **Warning:** Do not set module without installing cross bracing.

2.3 **NOTE:** Some small units arrive on site with support steel attached. Extended units shipped with separate housing and hoppers, may have bracing attached to keep sub-assemblies supported during shipping. These braces should be removed before erection.

2.4 Assemble the walkway and handrail on the ground near the unit. Cut, bend and weld handrail to suit if necessary. Place ladder(s) in desired position and cut cage to suit if necessary. Weld to the support framework.

2.5 Bolt inlet and outlet ductwork to module inlet and outlet making sure to use correct gasketing material between flanges. On modules where an inlet or outlet damper valve is required, bolt all mating flanges as above with gasket material. Be sure that damper blade and damper actuator have proper clearance and do not have interferences. See Separate instructions.

**NOTE:** Inlet and outlet ducts outside baghouse confines to be supported independently.

2.6 Assemble screw conveyor and/or rotary valve to hopper discharge flange, making sure to use a gasketing material between all flanges. Assemble drive components and wire motors taking note of rotation. See Separate Instructions.

2.7 **BAG INSTALLATION:** See Fig. 1

1. **NOTE:** To insure proper operation and the longest possible filterbag life, it is imperative that bags be handled with care at all times. Any small cut or puncture can result in total bag failure in future.
2. Before installing filterbags in the collector, inspect all cages for broken or bent wires. Do not install damaged cages into bags. Install side rows first, and proceed to work towards access door.
3. Install filterbags by first inserting closed end portion into tubesheet hole.
4. Compress snap ring by grasping with both hands and pushing in with thumbs. Once the top ringed portion of the bag is inserted in cup, be certain it is properly seated. Top end of bag cuff should be slightly below top of the tubesheet or just even. We suggest bagging 1/3 of the collector before proceeding to next step. See Page D-9. It is suggested that the collector have bags installed approximately 1/3 near the side, then insert venturi and cages, followed by 1/3 near other side, followed by centre section.
5. Snap cage top (open end) onto venturi lugs, making sure venturi is locked into place.  
**NOTE:** A. Be certain that the venturi lugs do not line up with the splits in the cage ring.  
B. If you have vertical split cages, please contact Wheelabrator for interlock instructions.
6. Insert closed end of cage into bag and allow cage to slide until venturi flange rests flat on the tubesheet. **NOTE:** There is no fastening hardware required as the interference between the bag and cage is sufficient to hold down the assembly.

## JET III TOP ACCESS

**Bag Changing** - Once unit is shut down, remove the manifold, then pull out cage and venturi leaving the dirty bag in place. Reach into the top of the filter bag and using the convenient finger loop, remove the bag.

Bag may then be dropped to the hopper below for removal, keeping the clean air plenum as clean as possible, or, if desired, bag may be pulled up through the collar. This can be difficult, however, if the accumulated dust has caused the bag to swell, or become very heavy.

Proceed with bag installation as per Item 2.7.

## 2.8 MANIFOLD PIPE INSTALLATION

Remove compression nut and spacer from coupling and slide on manifold pipe, followed by gasket. Insert manifold into wall coupling with holes facing down.

Bolt tail to support angle firmly and slip compression nut, spacer and gasket on and into coupling. Secure nut on coupling and at tail end of manifold. Proceed through all rows working side wall ends first and working to door until complete.

## 2.9 COMPRESSED AIR

To ensure trouble free operation an adequate supply of clean, dry compressed air is essential. Check the detail of order to see Wheelabrator's recommendations for the compressed air required. The pressure at the air header (air valves) should be 90 PSI. Wheelabrator Canada Inc. recommends that a line filter, dryer and regulator pressure gauge be installed ahead of the air header to ensure trouble free service. All air piping should be of adequate size with a shut-off valve with pressure gauge located at each module. The air header is supplied with 1 1/4 NPT compressed air connection at each end (one end plug to be used as drain).

## 2.10 **ELECTRICAL**

For trouble free service, a solid state pulse timer is provided in a NEMA IV weather-tight enclosure (NEMA IX explosion proof optional). The timer is to be mounted in an area that is free of the danger of being bumped or damaged, yet is accessible.

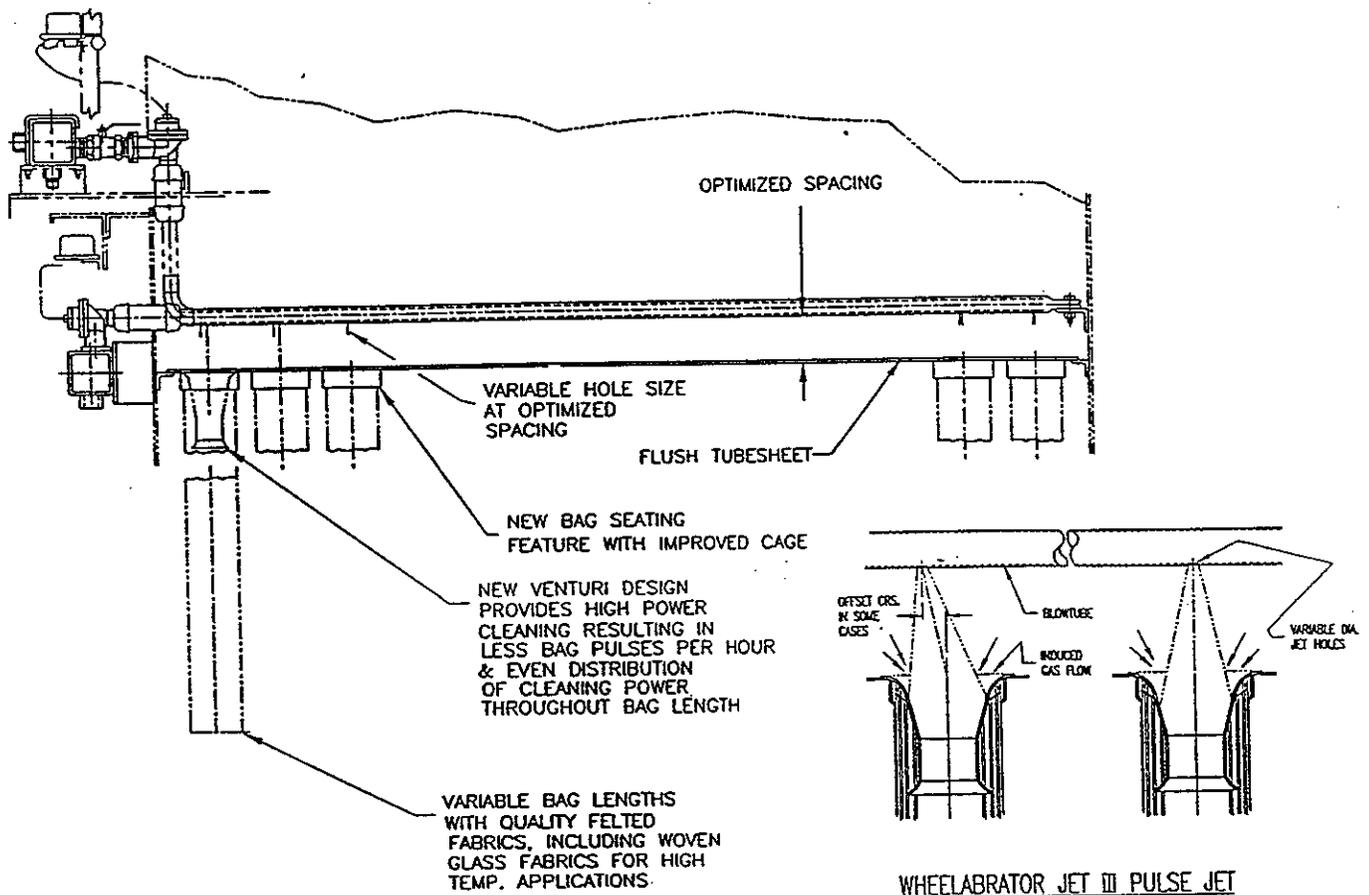
To wire solenoids to timer, follow the wiring schematic as shown per Electrical Drawing Section IV. Recommended wire from the timer to solenoids is No. 14 gauge and should be encased in a conduit according to local codes requirements. Power input and output to and from the timer is 110-115 volt AC.

**NOTE:** The timer is equipped with "on time" and "off time" control knobs. Do not adjust the "on time" setting as it has been factory set to give a 50 millisecond pulse. The "off time" can be adjusted as required to maintain a satisfactory differential pressure across the filter. Decreasing the "off time" increases the pulse rate causing the unit to clean at a faster rate.

Wire all motors, fan, air locks, screw conveyors, compressor, etc., - in accordance with nameplate data and note rotation of each to ensure proper operation of driven equipment.

If light fixture (optional) is furnished, locate in a convenient location free from the danger of being bumped. Be sure to install a toggle-type on/off switch.

PULSE-JET MARK III COMPONENT HARDWARE BY WHEELABRATOR

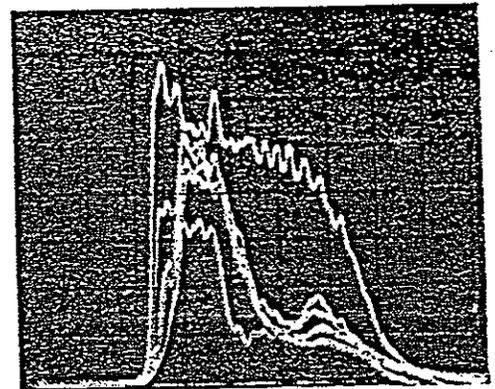


WHEELABRATOR JET III PULSE JET

**Blowpipe, Venturi design**

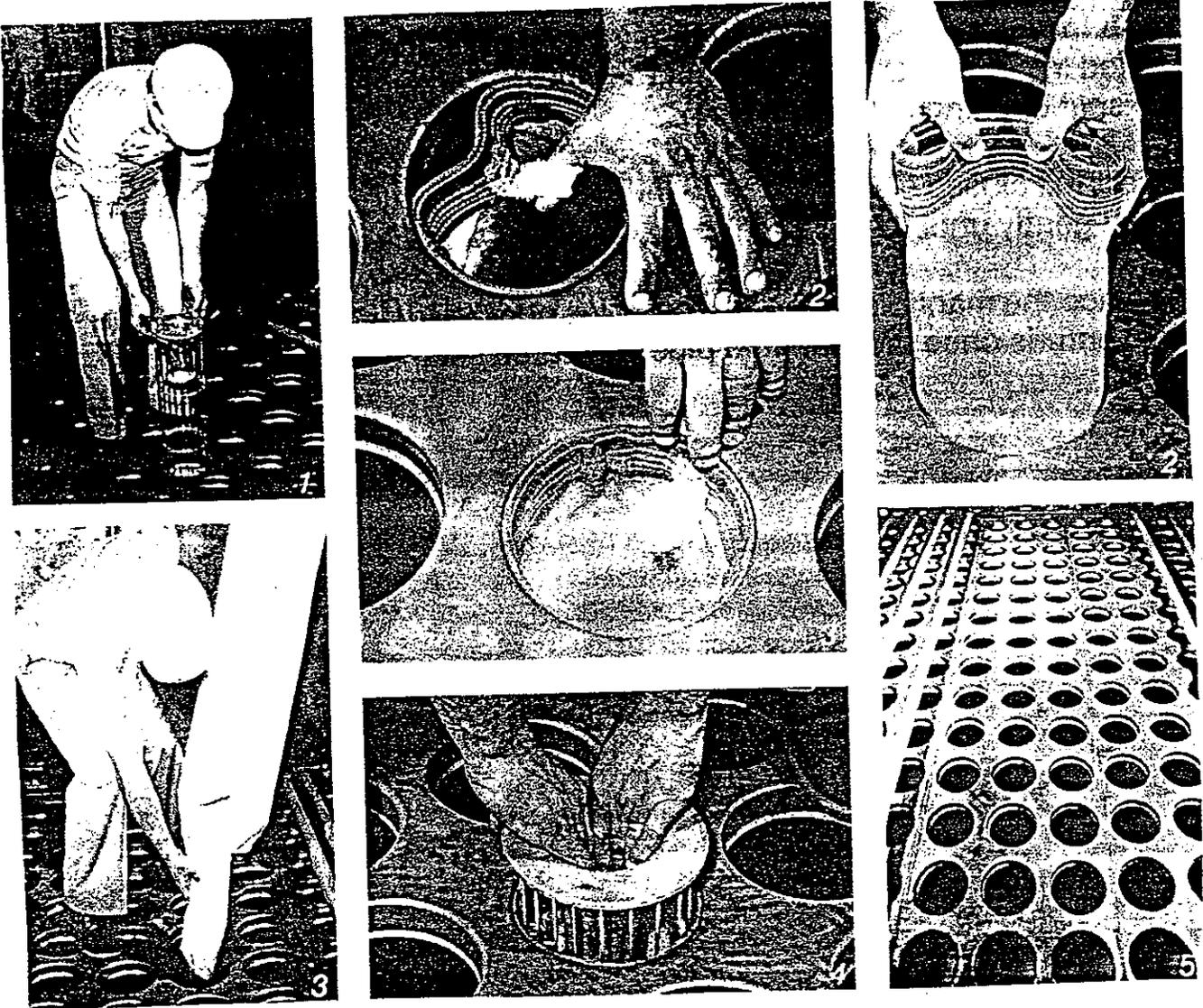
Perhaps the key ingredient to maximized pulsing power to all filter bag elements is the design of the blowpipe manifold. The Wheelabrator design uses variable orifice size, and variable orifice spacing, to maximize cleaning power and effectively reduce filter drag. Note how the placement of the orifice in relation to the venturi and other spacing criteria form part of the design.

The use of a properly designed venturi without question improves cleaning power. The venturi utilizes flow from the primary orifice, which causes inducement of secondary air flow from the clean air plenum. The solid state timing system and double diaphragm valve and manifold distribution, effectively cleans each individual filter bag with split second action. The overall design lowers filter bag wear as a direct result of fewer bag pulses per hour. This also reduces penetration of the collected dust to the clean gas side improving over-all filtration efficiency for the system.



*Optimized ejector pump curve cleans all filter bags effectively. Irregular cleaning power as indicated has been eliminated. Increased flow — lower filter drag — less power consumption. Wheelabrator Mark III conversion is available for all fabric filter installations.*

FILTER INSTALLATION INSTRUCTIONS  
FOR  
JET III FILTERS OFFER TRUE SIMPLICITY IN  
IDENTIFICATION AND REPLACEMENT OF  
MALFUNCTIONING BAGS



1. *With unit shut down, remove the manifold pipe, pull out venturi and cage assembly, leaving the dirty bag in place.*
2. *Simply reach into the bag collar and retract the snap ring using the convenient finger loop. No tools required. Bag may then be dropped to the hopper for removal, keeping the clean air plenum as clean as possible.*
3. *Feed the new bag into the unit through the tubesheet hole. Ensure that the bag top is flush with the surface of tube sheet and the snap ring is located securely.*
4. *Replace the cage/venturi assembly and the manifold pipes.*
5. *Because of the clean flat design of the tubesheets in the Jet III, housekeeping at bag changing is minimized.*

Fig. 1.

## DUSTUBE, CAGE AND VENTURI FIELD ASSEMBLY JET III MK. III

1. Place bag into tube sheet by folding in half lengthwise and carefully sliding it through the tube sheet hole. Ensure the snap ring is set into the proper position inside the cup of the tube sheet and "snaps" open.
2. Snap the venturi into the top of the cage making sure the venturi is locked into place.

NOTE: a) Be certain that the venturi lugs do not line up with the split opening in the cage ring.

b) If you have vertical split cages, please contact Wheelabrator for interlock instructions.

3. Insert the closed end of the cage into the bag and allow the cage to slide gently until the venturi flange rests flatly on the tube sheet.
4. Replace the manifold pipe with the holes down and on a centre line with the venturis once the manifold pipe is located securely in place.

**PRECOMMISSIONING START-UP  
AND SHUT DOWN  
FOR  
JET III DUST COLLECTORS**

The following should be checked and corrected before introducing dust laden air into the filter.

1. Check filter bags for proper fit into the cup so that top edge of bag cuff is slightly below top of the tube sheet or just even.
2. Make sure the cage is properly snapped into the venturi lugs and that venturi flange is flush with the tube sheet floor.

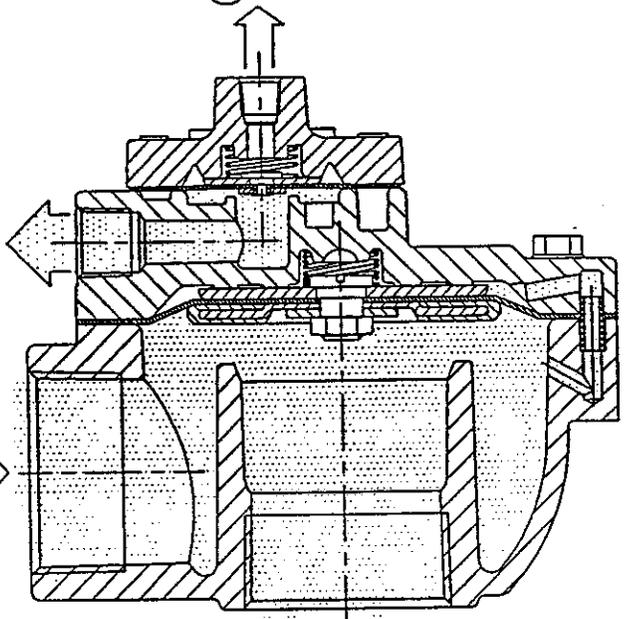
**NOTE:**

- A. *No additional hold down device is required, as the interference fit between the cage and bag is adequate.*
- B. *If there is a grounding strip supplied in the filter bag; make sure the strip is in contact with the tubesheet.*
- C. *If you have vertical split cages, please contact Wheelabrator for interlock instructions.*

3. Make certain the manifold pipes are parallel, the holes are facing down and the longitudinal center line of the pipes are directly over the center line of the venturis. Blow holes along the pipes do not necessarily line up with the center of the venturi. They have been spaced scientifically to achieve maximum cleaning power. Manifolds should be secured by connecting the open end of pipe to the coupling and the other end bolts to the manifold support angle at rear of module.
4. Insure the access door is properly secured and sealed, if not adjust as necessary by moving butt hinges and/or latch plates as required.
5. Inspect hopper area to insure that the screw conveyor and/or rotary valves are free of debris. Firmly secure hopper access door or bolted panels airtight.
6. Check the screw conveyor for correct rotation. Check rotary valve for correct rotation.
7. Open the compressed air header drain cocks or plugs and turn on compressed air to header system to blow out moisture and debris. When header discharge is free of visible moisture shut off the compressed air supply and close the drain or plugs.
8. Do not open air supply at this time.

TO ATMOS.

TO ATMOS.  
VIA. SOLENOID

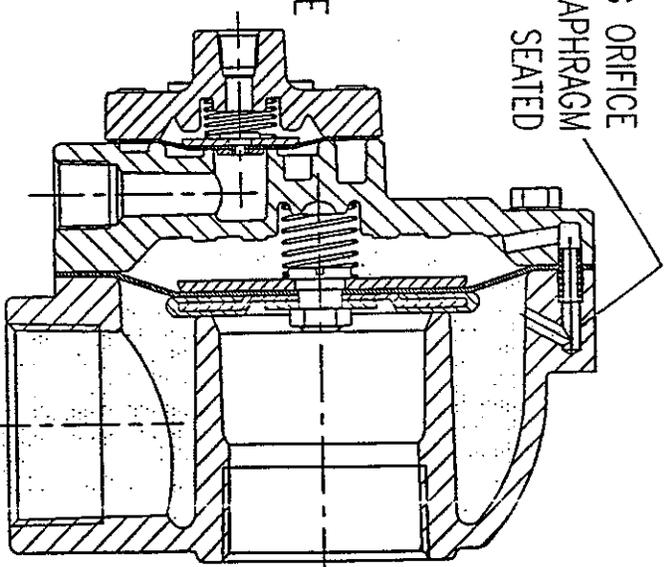


FROM COMPRESSED  
AIR HEADER

VALVE OPEN

TO BLOWTUBE

EQUALIZING ORIFICE  
TO KEEP DIAPHRAGM  
SEALED



1. COMPRESSED AIR ACTING ON LARGER AREA  
BACKSIDE OF PRIMARY DIAPHRAGM, KEEPS  
VALVE CLOSED.

FROM COMPRESSED  
AIR HEADER

VALVE CLOSED

SOLENOID VALVE IS OPENED ELECTRICALLY,  
RELIEFING PRESSURE ON BACKSIDE OF PILOT DIAPHRAGM.  
IN DOING SO, IT RELIEVES PRESSURE ON THE BACKSIDE  
OF THE PRIMARY DIAPHRAGM, VIA. CONNECTING PORTS (NOT  
SHOWN IN SECT. DWG.) THIS IS EXHAUSTED TO ATMOS.  
FILLS THE BLOWTUBES & CAUSES THE FILTER BAGS TO BE  
CLEANED.  
THE SOLENOID VALVE CLOSES, PILOT DIAPHRAGM CLOSES  
ASSISTED BY THE SPRING, CAUSING THE PRIMARY DIAPHRAGM  
TO CLOSE ASSISTED BY THE SPRING.  
COMP. AIR BLEEDS THRU' THE EQUALIZING ORIFICES  
TO KEEP BOTH DIAPHRAGMS CLOSED.

G	
F	
E	
D	
C	
B	
A	

**Wheelabrator**  
AIR POLLUTION CONTROL

RIGHT ANGLE VALVE  
CROSS-SECTION OF WORKING  
PART



9. Energize the electronic(s) on the timer board and adjust for a rapid fire sequence. Observe timer LED's at the same time. Listen for an audible click from the solenoid box until all terminals have been fired. (See timer schematic wiring diagram if trouble occurs.)
10. Cover diaphragm valve exhaust ports with a piece of adhesive masking tape.
11. Open compressed air supply to headers, these valves should be opened as quickly as possible, so as to seat the diaphragm. Failure to do so may cause the diaphragm to flutter, and air will leak past the diaphragm seat.
12. Re-energize the electrical supply to the timer, and allow module to pulse through a cycle.
13. With air and power off, examine each diaphragm valve exhaust port. The pieces of masking tape should be blown away from the valve exhaust ports. Any valve with masking tape in place should be checked for malfunction, including it's solenoid valve. See Dwg. RAV-1
14. Reset timer back to an off-time setting of approximately 45 seconds.
15. Adjust header compressed air supply to 90 psig.

***THE COLLECTOR IS NOW READY FOR OPERATION.***

## INITIAL SYSTEM START-UP

1. Start mechanical dust handling system. Screw conveyor(s) and/or rotary air lock valves.
2. Insure compressed air is open to header system at a pressure of 90 PSIG except for units equipped with Gore-Tex filter bags, in which case the header pressure should not exceed 70 PSIG.
3. Start exhaust fan in dampered condition.

**NOTE:** On process systems such as dryers, coolers or kilns, etc., where water vapour or other condensibles are present, it is necessary to preheat the system so that the module skin temperature of the complete dust control system is above the dew point temperatures. Instrumentation should be adjusted to maintain the gas temperature above the dew point of the condensibles and below the maximum limit of the filter media.

4. Note and record the magnehelic reading. The system should be allowed to operate in the "throttled" position until the magnehelic reading reaches 4" to 5" W.G.
5. At this point, start the pulse cleaning system. The timer off-time setting should be adjusted for 45 sec pulse frequency and should be increased or decreased if the differential pressure begins to climb or fall.
6. Slowly, and in small increments, open the fan damper. Observe differential pressure reading for the effect on resistance. Increase or decrease the timer setting to pulse as required to maintain a manometer reading between 4" and 5" W.G.
7. Continue over the next few hours to open the fan damper until design volume is reached.
8. With the collector operating at design volume, the pulse frequency should ideally be set for the fewest pulses/minute while holding the pressure differential across the filter at a stable condition in the 4.0" to 6" range.

**NOTE:** During some conditions, the differential pressure may creep beyond 6" W.G. due to surge grain loadings, moisture in air, etc. This can also be considered normal, providing the differential pressure can be regained after the surge.

For proloned periods of work stoppage when the system is not required to handle dust laden air it is recommended that the timer be shut down. This will prevent over cleaning of the filter.

## DUST COLLECTOR SYSTEM SHUT DOWN

1. Stop exhaust fan (by stop switch, NOT main disconnect switch).
2. Allow the pulse cleaning system to remain operating for between 5 to 15 minutes after fan has stopped rotating. (This is to ensure that all the remaining dust has been removed from the dust bags).
3. Allow the dust removal and disposal equipment (rotary valves, screw conveyors, etc.) to operate for approximately 10 to 15 minutes after pulsing to allow material to be fully discharged from the hoppers.

This procedure must be followed to ensure that all remaining dust is removed from the system to prevent "cementing" of the dust which causes plugging.

**NOTE:** On certain process systems it is essential that heat continually be introduced into the dust collecting system at a reduced rate to dry all metal surfaces and filter media. Heat can be removed only after all surfaces are free of the danger of condensation.

If you have any doubt as to these procedures, do not hesitate to contact your local Wheelabrator Representative or Wheelabrator Canada Customer Service.

## TROUBLE SHOOTING

### 1.0 VISIBLE STACK EMISSIONS

#### 1.1 Improperly installed Bags

Check bag snap bands to insure proper seating into tubesheet. Bag should be flush or slightly below the top of tubesheet.

#### 1.2 Torn or Punctured Bags

Inspect filter bags for tears or punctures caused by mechanical damage during installation. Abrasion, thermal or chemical attack and broken cages can also cause failures.

#### NOTES:

- Dust usually accumulates around the area of broken bags. Replace bags as required.
- If cage wires are broken or split, replace cages immediately. Do not put new bags on broken cages.

#### 1.3 Dirty Clean Air Plenum

After bag failure or during routine filter change-outs, dust will accumulate in dead air zones.

Always clean tubesheet when dust accumulation is present.

### 2.0 HIGH DIFFERENTIAL PRESSURE

#### 2.1 Over Volume

Check fan and motor speeds and V-belt drive ratio if applicable. Reset fan damper to handle collector design volume.

#### 2.2 System Resistance Static Is Too Low

Recalculate ductwork design to insure proper static losses. If too low, reduce fan speed or add system resistance.

#### 2.3 Fugitive Air Entrainment.

Check all doors and cover plates for proper sealing. Check all ductwork flanges for air tight seals. Apply gasketing or re-tighten fasteners.

**2.4 Lack of Compressed Air:**

Check pulsing system for compressed air leakage - repair as required.

Check compressor output to assure it exceeds pulse cleaning system usage - add extra volume as required.

Compressed air pressure too low - increase line pressure from regulator-compressor.

Check clogged feed lines. Replace line filter or check for debris in line.

On larger runs of piping, make sure the diameter is of sufficient size so as not to cause abnormal pressure drop.

**2.5 Malfunctioning Timer.**

Check timer outputs to insure all terminals are firing. If timer is faulty, return to Wheelabrator for repair.

**2.6 Dust Re-Entrainment.**

Check dust removal system for worn or faulty seals - repair or replace as required.

Check mating flanges - apply gasketing and/or re-tighten fasteners as required.

Dust disposal system plugged or jammed - clean and check disposal system for unloading capacity.

**2.7 Dust on Clean Air Side.**

Check tubesheet floor and clean as necessary to prevent dust from entering bags from clean air side.

Check inside of bags for dust and empty as required. Dust in bag will cause stack emissions on a cycle synchronized with pulse blasts.

**2.8 Bag Blinding.**

Check system so that no condensation or free moisture is occurring on bags. Add auxiliary heat by changing process procedure and eliminate water seepage in to unit.

Check fan to insure collector was started under throttled conditions. Extra high speed impingement of fine particles can permanently blind filter media.

**3.0 INADEQUATE SYSTEM VOLUME.**

**3.1 Fan Rotating Backwards.**

Check and correct if necessary, rotation of fan.

**3.2 High Differential Pressure**

See Section 2.0 above.

**3.3 Fan RPM Too Low.**

Check drive ratio between fan and motor. Check drive for slippage - re-tighten or replace as required.

Fan damper improperly adjusted. Check damper position and adjust to maintain collector design volumes.

**3.4 System in Leakage**

Check all ducting and flanges to and from collector for leaks. Re-gasket and tighten fasteners as required.

Check hopper dust disposal equipment for leaking seals. Adjust or replace as required.

**3.5 System Resistance Static Too High.**

Recalculate ductwork design to insure proper static losses. If too high, increase fan speed or lower system resistance. Check ductwork for material build-up or blockages. Clear and re-design if necessary.

**3.6 Blinded Bags**

Inspect bags for possible blinding. Blinded bags result in high pressure drop.

Clean bags with fan off, if differential pressure is still high, have filter bags laundered or install new bags.

See 5.0 - Filter Bag Problems.

**LOW COMPRESSED AIR AT HEADER.**

**4.1 Sticking Solenoid Valves.**

Check solenoid plungers for dirt. Clean or replace as required.

Short circuit in wiring may cause one or more solenoids to remain open - check wiring and repair or replace as required.

Short circuit in timer relays - check and repair if possible. Replace timer if required.

**4.2 "Pulse On time" Is Too Long.**

Adjust "on time" for 1/20 (50 m/s) second maximum. (This is factory preset and normally should not be adjusted.)

**4.3 Sticking Diaphragm Valves - check for torn or damaged diaphragms. Replace as required.**

**4.4 Debris in Diaphragm Valves.**

Check for dirt or ice on diaphragm wafer. Clean or replace as required. If ice, install dryer on compressed air to eliminate moisture.

**4.5 Leaks in Compressed Air Piping.**

Inspect compressed air line run for leaks.

**4.6 Insufficient Supply of Compressed Air.**

Check capacity for air compressor to insure proper sizing. See detail or Order to determine demand of unit. Also check for undesigned branch-offs in compressed air run. Add extra capacity or independent source.

**4.7 Header/Air Valve Connection is Faulty.**

Inspect connection and repair as required.

**5.0 FILTER BAG PROBLEMS (POOR LIFE)**

5.1 Check system operating temperature against filter media rating. Lower temperature of system or rebag with media suitable to higher temperatures encountered.

5.2 Check system physical and chemical characteristics against filter media rating. Adjust system gas stream or install new media compatible with gas stream.

5.3 Check abrasion patterns on bag, collector walls, etc. Evaluate duct design.

5.4 Check material build-up in hopper. Inspect dust disposal equipment for proper operation. Repair as required.  
Check hopper bridging. Install vibrators, rappers, etc., or enlarge discharge opening.

**5.5 Incorrectly Installed Bags.**

Check for proper seating of bag into tubesheet. Make sure bags are hanging straight and not touching walls or each other.

5.6 Inspect cages for broken or bent wires which can puncture or tear bags. Repair or replace cages(s).

**5.7 Dirty Clean Air Plenum.**

Inspect tubesheet floor for dust accumulations. Dust on tubesheet floor can be entrained into inside of bag by cleaning system. This can cause blinding or abrasion by impregnating bags from the reverse direction.

**5.8 Rough Handling of Bags At Time of Installation.**

Handle bags with care as any small cut or abrasion can cause total bag failure.

## **STORAGE OF FILTERBAGS**

Proper storage of filterbags is essential in maintaining maximum collecting efficiency of your air pollution control unit.

Store filterbags in the crate(s) in which they were shipped in a cool dry place, (preferably on pallets covered with plastic, in a warehouse, where physical damage to the crates will not occur).



INTERNATIONAL  
MILL SERVICE

# VISIBLE EMISSION EVALUATION

NAME OF PLANT: \_\_\_\_\_

ADDRESS: \_\_\_\_\_

DATE: \_\_\_\_\_

CITY, STATE: \_\_\_\_\_

OBSERVER: \_\_\_\_\_

FACILITY DESCRIPTION \_\_\_\_\_

COMPANY: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

DESCRIPTION OF OBSERVATION POINT:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

ESTIMATED DISTANCE BETWEEN  
OBSERVER AND EMISSION SOURCE:

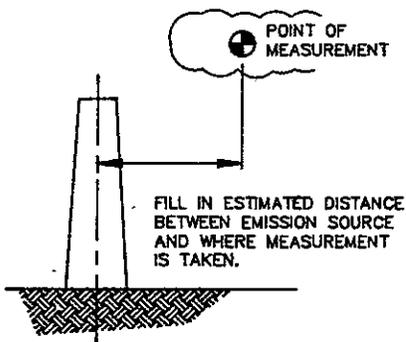
DESCRIPTION OF SKY CONDITIONS:  
(PRESENCE AND COLOR OF CLOUDS)

\_\_\_\_\_  
 \_\_\_\_\_

COMMENTS:

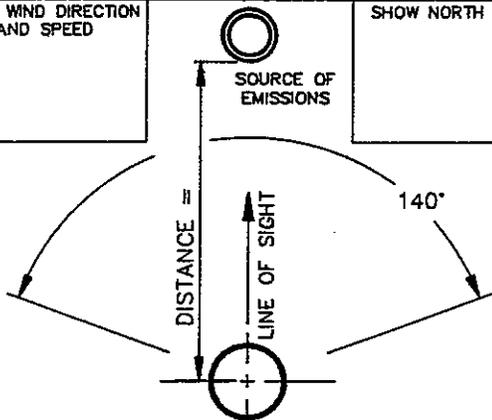
\_\_\_\_\_  
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SHOW WIND DIRECTION  
AND SPEED

SHOW NORTH ARROW



KEEP THE SUN AT YOUR BACK

PLACE THE END OF YOUR PENCIL IN THE CENTER OF THE CIRCLE. THE PENCIL SHADOW SHOULD FALL WITHIN THE 140° AREA FOR AN ACCEPTABLE READING SERIES. MARK WHERE THE SHADOW LIES.

  
 NUMBER OF READINGS

  
 SUM TOTAL OF READINGS

  
 AVERAGE OF ALL READINGS

## APPENDIX "A"

### APPLICABLE REGULATIONS:

326 IAC 5-1-4 as follows:

*Sec. 4 (a) Determination of visible emissions from sources or facilities to which this rule applies shall be made in accordance with subdivision (1) or (2) as follows:*

*(1) Determination of visible emissions by means of a qualified observer shall be made according to the following:*

- (A) The qualified observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun, if visible, oriented in the one hundred forty degree (140°) sector to his back. Consistent with maintaining the requirement in this clause, the observer shall, as much as possible, make his observations from a position such that his line of vision is approximately perpendicular to the direction of the visible emissions or plume, where applicable, and when observing opacity of emissions from rectangular outlets, for example, monitors, open baghouses, or noncircular stacks, approximately perpendicular to the longer axis of the outlet. The observer's line of sight shall not include more than one (1) plume at a time when multiple stacks are involved, and in any case the observer shall make his observations with his line of sight perpendicular to the longer axis of such a set of multiple stacks, for example, stub stacks on baghouses.*
- (B) The observer shall record the name of the plant, emission location, type of facility, observer's name and affiliation, and the date on a field data sheet. Time, estimated distance to the emission location, approximate wind direction, estimated wind speed, description of the sky conditions (presence and color of clouds), and visible emissions or plume background shall be recorded on a field data sheet at the time opacity readings are initiated and completed.*
- (C) Opacity observations shall be made at the point of greatest opacity in that portion of the visible emissions or plume where condensed water vapor is not present. The observer shall not look continuously at the visible emissions or plume, but instead shall observe the visible emissions or plume momentarily at fifteen (15) second intervals.*
- (D) Opacity observations shall be recorded to the nearest five percent (5%) at fifteen (15) second intervals on an observational record sheet. A minimum of twenty-four (24) observations shall be recorded. Each momentary observation shall be deemed to represent the average opacity of emissions for a fifteen (15) second period.*

## APPENDIX "A"

(continued)

- (E) *Opacity shall be determined as an average of twenty-four (24) consecutive observations recorded at fifteen (15) second intervals. Readings preceding and following missed readings shall be considered consecutive. Divide the observations recorded on the record sheet into sets of twenty-four (24) consecutive observations. A set is composed of any twenty-four (24) consecutive observations. Sets need to be consecutive in time and in no case shall two (2) sets overlap. For each set of twenty-four (24) observations, calculate the average by summing the opacity of the twenty-four (24) observations and dividing this sum by twenty-four (24). Record the average opacity on a record sheet. For the purpose of determining an alternative visible emission limit in accordance with Section 5(b) of this rule, an average of twenty-four (24) consecutive readings or more may be used to calculate the alternate visible emission limit.*
- (F) *For emissions from intermittent sources, opacity shall be determined in accordance with clauses (A), through (C) and the first sentence of clause (D). Each momentary observation shall be deemed to represent the average opacity of emissions for a fifteen (15) second period. All readings greater than the specified limit in Section 2 of this rule shall be accumulated as fifteen (15) second segments for comparison with the limit.*
- (G) *When condensed water vapor is present within the plume as it emerges from the emission outlet, opacity observations shall be made beyond the point in the plume at which condensed water vapor is no longer visible. The observer shall record the approximate distance from the emission outlet to the point in the plume at which the observations are made.*
- (H) *When water vapor in the plume condenses and becomes visible at a distinct distance from the emission outlet, the opacity of emissions shall be evaluated at the emission outlet prior to the condensation of water vapor and the formation of the steam plume.*
- (2) *For a source or facility in compliance with the requirements of 326 IAC 3-1.1, determination of compliance with visible emission limitations established in this rule may also be made in accordance with a source's or facility's continuous monitoring equipment if determined appropriate by the department or the U.S. EPA.*
- (b) *If the compliance determination procedures set forth in subsection (a) result in a conflict in visible emission readings, the determination made in accordance with subsection (a)(2) shall prevail for the purpose of compliance, provided that it can be shown that the opacity continuous emissions monitor meets the performance specifications set forth in the 40 CFR 60, specifically Performance Specification 1.*

**VISIBLE EMISSION EVALUATION PLAN  
FOR INTERNATIONAL MILL SERVICE OPERATIONS  
AT US STEEL, GARY WORKS**

This plan was prepared and submitted in accordance with revisions to the Indiana Clean Air Statutes as amended June 11, 1993 incorporating PM10 Standards. This plan deals with the visible emissions evaluations as required by 326 IAC 6-1-10.1(p)(3)(G). Among the facilities specifically required to prepare such a plan is US Steel, Gary Works. International Mill Service operates as an independent contractor within Gary Works. As such, IMS is submitting the plan covering its facilities directly to the Indiana Department of Environmental Management (IDEM) for review and approval.

International Mill Service (IMS) has operations at US Steel, Gary Works to perform work under a contract with US Steel to recycle iron and steel, by processing slag and kish from steelmaking operations. These processing facilities include Main Slag Processing, Iron Crushing, Ball Drop and Tundish Lancing. IMS is also currently responsible for Beaching of Iron at Gary Works. Each of these operations will be discussed below as well as current plans for achieving compliance and proposed plans for visible emissions evaluations. (See Table I.) This does not displace the continuous Compliance Plan which will be submitted later.

IMS also operates a Slab Scarfing facility at Gary Works which captures potential emissions through a baghouse. This is not covered herein but will be included in the Continuous Compliance Plan being developed.

The routine activities involving the reclamation of iron and steel as stated above, conducted by IMS, will be subject to a 20% opacity on a three (3) minute average as measured by 40 CFR 60, Appendix "A", Method 9 [326 IAC 6-10.1 (p)(3)(F)] visible emission standards. Fugitive emissions from batch and continuous transfer, storage piles, truck loading, pot dumping and transportation related emissions are not a part of this plan, they are included in a separate fugitive emission plan.

A quarterly report demonstrating compliance with the visible emission plan and the PM10 standards will be submitted to IDEM within (1) month of the end of a calendar quarter. Actual visible emission records will be retained for one year.

### **MAIN SLAG PROCESSING**

This area processes primarily slag from steelmaking operations. The process equipment consists of three screening stations and a crusher connected by belt conveyors. Magnetic head pulleys on the conveyor separate iron bearing materials from the non-magnetic slag. Finished materials, classified by size and iron content, are returned to US Steel for use as feedstock in iron and steelmaking operations.

## **MAIN SLAG PROCESSING (continued)**

This facility is situated in a vacated mill building which has a roof, but no walls. The roof provides weather protection for the equipment and material, which must remain relatively dry for effective screening. For emissions evaluation purposes, the equipment will be treated as sources, the building plays no role in the control scheme. As stated above, continuous transfer, storage pile, and truck loading operations are covered by fugitive emission regulations.

The normal processing of these materials involves spraying water to cool the hot slag. The moisture introduced helps to control dusting. An additional conceptual plan for achieving compliance in the main slag processing area is to introduce moisture in controlled quantities to reduce dusting. This system is not presently in place and will be developed over the next few months. During development, visual emission readings will be taken on a regular basis to evaluate the effectiveness of the controls and to optimize operation. If measurable parameters can be developed to ensure that the facility will remain in compliance, the visual reading frequency will be decreased to a weekly basis as a check on the efficiency of the control system. If development and testing show that control performance cannot be predicted, daily visual readings will be taken to optimize the performance of the control measures to the current conditions. All readings taken will relate to the screening and crushing operations.

## **IRON CRUSHING**

This area processes by product streams which are high in iron content. The goal of this process is to reduce the iron bearing material to a minus six inch size so that it can be reused in the ironmaking process. Small amounts of metallic and nonmetallic fines are produced as a by-product of this operation. The equipment in this operation consists of a jaw crusher, a hammermill, two screens and interconnecting conveyor belts. Magnetic head pulleys separate iron bearing materials from non-magnetic materials.

This facility is situated in a vacated mill building. It is uncertain at this point whether the building will play a role in the final control scheme.

The conceptual plan for achieving compliance in this facility is to use water sprays at strategic points in control dust. The control system will be developed over the next few months. During development, visual emission readings will be taken on a regular basis to evaluate the effectiveness of the controls and to optimize operation. Assuming that control could be achieved through sprays, the equipment would be treated as the source with monitoring of flow rates to the water sprays to assure compliance. Visual readings would be taken weekly as a cross check.

## **BALL DROP**

This area is used to reduce the size of material which is too large to be processed in the facilities discussed previously. The process at this facility consists of dropping a large steel ball on the material to break it. Broken material is then sent to the processing areas or directly to US Steel operations for recycling.

This facility is situated outdoors. It is surrounded by a fifty foot chain link fence to contain flying debris.

The conceptual plan for achieving compliance in this facility is to manually wet the material as needed. Because this is an outdoor facility, the amount of water required will vary with weather conditions. To ensure compliance, designated personnel in this area will be trained in Method 9 visual reading. It will be the duty of these personnel to initiate water application when visible emissions approach the allowable limits. As a cross check a different reader will record one hour of readings on a weekly basis.

## **TUNDISH LANCING**

IMS performs oxygen lancing on tundish blocks to reduce their size. Cut blocks are sent to the Ball Drop area for further size reduction, then back to the steel shops for recycling.

This work is currently performed outdoors.

Several avenues are being investigated to achieve control. One is to inject CO<sub>2</sub> into the lance to reduce emissions. A second is to use a hood and collector arrangement. A third is to use a building with a vent as a control. Some combination of the above may be used. Until the control scheme is finalized, it is impossible to say whether proof of compliance will be based on visual observation or monitoring of process parameters. At a minimum, the process will be visually checked once per week as a cross check on the control schemes.

## **BEACHING OF IRON**

IMS is currently responsible for performing the beaching of iron at Gary Works, when necessary. Beaching of iron is an emergency procedure which is only employed when the steel shops are unable to handle the supply of molten iron available.

US Steel is currently reviewing the issue of iron beaching and developing alternatives for compliance. Beaching of iron will be addressed in USX plans.

Since the emission limits for this source do not apply until December 31, 1994, no visual readings are planned until that time.

Table 1.

VISIBLE EMISSION EVALUATION

Source Description	Frequency of Observation		Reason for less than 1 hour per day visual emission readings
	Initial Observation	After Compliance Confirmed	
Main Slag Processing	Daily	Weekly	Measurable parameters will be monitored to ensure compliance.
Iron Crushing	Daily	Weekly	Measurable parameters will be monitored to ensure compliance.
Ball Drop	Daily	Weekly	Trained Method 9 readers in area will observe for emissions daily. Different reader provided weekly.
Tundish Lancing	Weekly	Weekly	Control measure implemented will ensure compliance.
Beaching of Iron	To be determined by USX.		Emission limitations imposed December 31, 1994. USX to address.

August 9, 1993

# CONTINUOUS COMPLIANCE PLAN

## INTRODUCTION

This control plan has been prepared to comply with 326 IAC 6-1-10.1 Lake County PM10 particulate matter control requirements. The Plan covers the operations of International Mill Service, Inc. (IMS) which occur within the facility listed in the regulation as "USS - Gary Works". The regulations defining the required contents of this plan are as follows:

326 IAC 6-1-10.1(m), (n), (p)(3)(F) and (G),(q) and (r)

- (m) The CCP shall contain, for the facilities specified in subsection (l), documentation of operation and maintenance practices of process operations and any particular matter control equipment existing or required to be installed, replaced, or improved by subsection (k) that are essential to maintaining compliance with the mass and opacity limits specified in subsections (d) and (e) and 326 IAC 5-1.*
- (n) The CCP shall include the following:*
  - (1) A list of the processes and facilities at the source.*
  - (2) A list of the particulate matter control equipment associated with the processes and facilities listed in subsection (l).*
  - (3) The process operating parameters critical to continuous compliance with the applicable PM10 or TSP mass and opacity limits, including applicable specific requirements listed in subsection (p).*
  - (4) The particulate matter control equipment operating parameters critical to continuous compliance with the applicable PM10 or TSP mass and opacity including applicable requirements listed in subsection (q).*
  - (5) The specific monitoring, recording and record keeping procedures for process and control equipment for each facility in the CCP specified in subdivision (1) and (2).*
  - (6) The procedure used to assure that adequate exhaust ventilation is maintained through each duct at facilities where emissions are captured by a collection hood and transported to a control device.*
- (p) A source or facility to which subsection (l) applies, which belongs to any source category listed in this subsection, shall include the following information, applicable procedures, or commit to the following actions in its CCP:*

## CONTINUOUS COMPLIANCE PLAN

### INTRODUCTION *(continued)*

- (3) *Steel mill CCPs shall include, as a minimum, the following:*
- (F) *Waste disposal and recycling practices of iron and steel scrap and other metallic scrap shall comply with the following:*
- (i) *Provide a description of the routine activities involving disposal and reclamation of iron and steel. The visible emissions from such activities shall not exceed twenty percent (20%) opacity on a three minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*
  - (ii) *Maintenance of process vessels, for example, pugh ladles, shall be performed in enclosed structures. The visible emissions from such structures shall not exceed twenty percent (20%) opacity on a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*
  - (iii) *Emissions from all steel scrap burning or cutting and oxygen lancing operations shall not exceed twenty percent (20%) opacity on a three (3) minute average as measured by 40 CFR 60, Appendix A, Method 9\*. The opacity shall be determined as an average of twelve (12) consecutive observations recorded at fifteen (15) second intervals.*
- (G) *Visible emission evaluation plans shall comply with the following:*
- (i) *Within sixty (60) days of the effective date of this section, each steel mill shall submit a plan to conduct visible emissions evaluations per the approved test method or procedures to determine compliance with the applicable opacity standard. The plan shall specify the frequency of visible emissions evaluations at the operations included in clauses (A) through (F). the plan shall include charging, pushing, lids and offtakes, doors, standpipes, and gas collector mains at coke production operations and lime plants.*
  - (ii) *If the plan specifies that the duration of readings is less than one (1) hour per day at each facility, the plan shall include the basis for less frequent evaluations.*

# CONTINUOUS COMPLIANCE PLAN

## INTRODUCTION *(continued)*

- (iii) *The department shall disapprove the plan if it does not include all facilities or if the proposed duration and frequency will not provide for a reasonable assessment of compliance.*
  - (iv) *Upon approval of a steel mill's plan by the department, the visible emissions evaluations shall commence and the data submitted to the department within one (1) month of the end of the calendar quarter.*
  - (v) *The plan may be revised with department approval at any time.*
- (q) *This subsection concerns particulate matter control equipment operation and maintenance requirements. A CCP shall provide that the following control equipment related information will be maintained at the source's property and will be available for inspection by department personnel:*
  - (1) *Startup, shutdown, and emergency shutdown procedures.*
  - (2) *Sources shall notify the department fifteen (15) days in advance of startup of either new control equipment or control equipment to which major modifications have been made.*
  - (3) *Manufacturer's recommended inspection procedures, preventative and corrective maintenance procedures, and safety devices and procedures, such as sensors, alarm systems, and bypass systems. If manufacturer's recommendations are not available, procedures shall be developed by the source.*
  - (4) *Contents of the operator's training program and the frequency with which the training is held.*
  - (5) *A list of spare parts available at the facility.*
  - (6) *A list of control equipment safety devices, for example, high temperature sensors and alarm systems, exhaust gas stream bypass system, or safety interlock system.*
  - (7) *Monitoring and recording devices and/or instruments to monitor and record control equipment operating parameters specified in subsection (n)(4).*
- (r) *Particulate matter control equipment operation, recording, and inspection procedure requirements shall be as follows:*
  - (1) *A CCP for a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures to be consistent with the requirements of subsection (m), such as the following:*
    - (A) *Operating parameters, such as the following:*
      - (i) *Pressure drop across the baghouse.*
      - (ii) *Gas flow rate at baghouse inlet.*
      - (iii) *Gas temperature at inlet.*

*A CCP shall identify the monitors and instrumentation, and their location, accuracy, precision, and calibration frequency. A CCP shall also include a description of any visible emission evaluation program.*

# CONTINUOUS COMPLIANCE PLAN

## INTRODUCTION *(continued)*

- (B) *Baghouse cleaning system. A complete description of the cleaning system, including such information as intensity, duration, frequency, and method of activation.*
- (C) *Baghouse inspection and maintenance schedule. The inspection schedule logs or records shall be available for inspection by the department for up to one (1) year after the date of inspection. The inspection shall include the activities and frequency of the activities. A source may request an alternative schedule based on manufacturer's recommendations or alternatives documented by the company. The revised schedule must be approved by the department. Inspections shall include the following:*
  - (i) *Daily inspections shall include the following:*
    - (AA) *Pressure drop.*
    - (BB) *Fan amperage.*
    - (CC) *Cleaning cycle.*
    - (DD) *Compressed air on pulse jet baghouses for values outside of the operating ranges.*
    - (EE) *Dust discharge equipment for proper operation.*
    - (FF) *General check for abnormal audible and visual conditions.*
  - (ii) *Weekly inspections of the following:*
    - (AA) *Moving parts on discharge system.*
    - (BB) *Bypass and isolation damper operation.*
    - (CC) *Bag tension.*
    - (DD) *Compressed air lines, oilers and filters.*
    - (EE) *Manometer lines.*
    - (FF) *Temperature indicating equipment.*
    - (GG) *Bag cleaning sequence.*
    - (HH) *Drive components on fans.*
  - (iii) *Monthly inspections of the following:*
    - (AA) *Bag seating condition.*
    - (BB) *Moving parts on shaker baghouse.*
    - (CC) *Fan corrosion and blade wear.*
    - (DD) *Hoses and clamps.*
    - (EE) *Bags for leaks and holes.*
    - (FF) *Bag housing for corrosion.*
  - (iv) *Quarterly inspections of the following:*
    - (AA) *Bags.*
    - (BB) *Ducts for dust build-up.*
    - (CC) *Damper valves for proper setting.*
    - (DD) *Door gaskets.*
    - (EE) *Baffle plate for wear.*
  - (v) *Annual inspection of the following:*
    - (AA) *Welds and bolts.*
    - (BB) *Hoppers for wear.*
    - (CC) *Cleaning parts for wear.*

# DOCUMENTATION OF OPERATION AND MAINTENANCE PRACTICES

## APPLICABLE REGULATION FOR PLAN CONTENT

- (m) *The CCP shall contain, for the facilities specified in subsection (l), documentation of operation and maintenance practices of process operations and any particulate matter control equipment existing or required to be installed, replaced, or improved by subsection (k) that are essential to maintaining compliance with the mass and opacity limits specified in subsections (d) and (e) and 326 IAC 5-1.*

Operating practices to control emissions consist of the addition of water to control dusting or in limited cases the use of a baghouse. A detailed discussion of the practices on an operation by operation basis is included below.

## **LIST OF PROCESSES AND FACILITIES**

### **APPLICABLE REGULATION FOR PLAN CONTENT**

- (n) *The CCP shall include the following:*
- (1) *A list of the processes and facilities at the source.*

**See Tab 3C**

# LIST OF PARTICULATE MATTER CONTROL EQUIPMENT

## APPLICABLE REGULATION FOR PLAN CONTENT

- (n) *The CCP shall include the following:*
- (2) *A list of the particulate matter control equipment associated with the processes and facilities listed in subsection (l).*

**See Tab 3F**

## CRITICAL PROCESS OPERATING PARAMETERS

### APPLICABLE REGULATION FOR PLAN CONTENT

- (n) *The CCP shall include the following:*
- (3) *The process operating parameters critical to continuous compliance with applicable PM10 or TSP mass and opacity limits, including applicable specific requirements listed in subsection (p).*

**There are no operating parameters which affect compliance.**

*Baghouse is over sized therefore no parameters affect CONTINUOUS COMPLIANCE.*

## CRITICAL OPERATING PARAMETERS FOR CONTROL EQUIPMENT

### APPLICABLE REGULATION FOR PLAN CONTENT

- (n) *The CCP shall include the following:*
  - (4) *The particulate matter control equipment operating parameters critical to continuous compliance with the applicable PM 10 or TSP mass and opacity including applicable requirements listed in subsection (q).*

To ensure proper operation, Baghouse air pressure must be maintained at 80psi minimum not to exceed 130 psi.

In the event that an interruption in air supply should occur, IMS will shut down until air supply is restored.

The pressure drop across the baghouse, that is from the inlet and outlet ducts, also called the differential pressure photohelic , located at the control cabinet, should remain in the 3 psig to 10 psig range for the baghouse to be properly operating.

# MONITORING & RECORDKEEPING

## APPLICABLE REGULATION FOR PLAN CONTENT

- (n) *The CCP shall include the following:*
- (5) *The specific monitoring, recording and record keeping procedures for process and control equipment for each facility in the CCP specified in subdivision (1) and (2).*

None of the IMS operations include any monitoring or recording devices for emissions. The CCP for the baghouse includes monitoring and recording of operating parameters and maintenance activity. please refer to that section for details.

# ADEQUATE VENTILATION IN DUCTS

## APPLICABLE REGULATION FOR PLAN CONTENT

- (n) *The CCP shall include the following:*
- (6) *The procedure used to assure that adequate exhaust ventilation is maintained through each duct at facilities where emissions are captured by a collection hood and transported to a control device.*

The only exhaust ductwork in the <sup>AND PHOTOHELIC GAUGE</sup> IMS facilities occurs at the Scarfing Facility Baghouse. By monitoring fan amps on a daily basis, pluggage of the ductwork can be detected. Also, the CCP includes annual inspection of the ductwork for build-up of solids. Refer to the CCP for further details.

# CONTROL EQUIPMENT OPERATION AND MAINTENANCE

## APPLICABLE REGULATION FOR PLAN CONTENT

326 IAC 6-1-10.1(q)(1) as follows:

*(q) This subsection concerns particulate matter control equipment operation and maintenance requirements. A CCP shall provide that the following control equipment related information will be maintained at the source's property and will be available for inspection by department personnel:*

*(1) Start-up, shutdown, and emergency shutdown procedures.*

## REQUESTED INFORMATION

The systems which IMS uses to control particulate emissions either operate continuously or start and stop with the processing function which they service. There are no specialized or specific start-up or shutdown procedures required. There are also no anticipated emergency conditions which require shutdown of the collection system. Consequently, there are no related emergency procedures.

## **A. START-UP PROCEDURE**

- 1.) Verify that Motor Control Center is Energized.
- 2.) Turn on the Compressed Air.
- 3.) Turn "on" Baghouse Control.
- 4.) Verify that Fan Breaker is on at MCC.
- 5.) Verify that Screw Conveyors Breakers are on at MCC.
- 6.) Check the Main Damper at stack if close.  
If Damper is not closed "**CLOSE IT**".  
The Fan Motor will not start with the Damper Open.
- 7.) Push the Fan Start Button.
- 8.) When the Fan started, and after the Fan Motor gets up to nominal speed, only after the top speed is reached, then go open the Main Damper.
- 9.) Start Both Screw Conveyors.

## **B. DURING OPERATION**

- 1.) Check the Reading of the Photohelic Gauge.
- 2.) Check if the Cleaning Cycle is Off Line.
- 3.) Follow the Closure of each Modules, during the Cleaning Cycle.

## **C. SHUT DOWN**

- 1.) Push the Fan Stop Button.
- 2.) Turn the Screw Conveyors Off.
- 3.) Turn the Fan Breaker Off (*for maintenance or repair*).
- 4.) Turn the Screw Conveyor Breakers Off (*for maintenance or repair*).
- 5.) Turn the Baghouse Control Panel Off (*for maintenance or repair*).
- 6.) Close the Main Damper.
- 7.) Turn off all Compressed Air (*for maintenance or repair*).

## **D. EMERGENCY SHUT DOWN**

- 1.) Push the Emergency Stop Button located on the Face of the Baghouse Control Panel.
- 2.) Turn off the Fan Breakers.
- 3.) Turn off the Conveyor Breakers.
- 4.) If necessary Turn Off the MCC after alerting Machine Operator.

## **CONTROL EQUIPMENT OPERATION AND MAINTENANCE**

### **APPLICABLE REGULATION FOR PLAN CONTENT**

326 IAC 6-1-10.1(q)(2) as follows:

- (2) *Sources shall notify the department fifteen (15) days in advance of start-up of either new control equipment or control equipment to which major modifications have been made.*

### **REQUESTED INFORMATION**

IMS will comply with the above requirement.

# CONTROL EQUIPMENT OPERATION AND MAINTENANCE

## APPLICABLE REGULATION FOR PLAN CONTENT

326 IAC 6-1-10.1(q)(3) as follows:

- (3) *Manufacturer's recommended inspection procedures, preventative and corrective maintenance procedures, and safety devices and procedures, such as sensors, alarm systems, and bypass systems. If manufacturer's recommendations are not available, procedures shall be developed by the source.*

## REQUESTED INFORMATION

These requirements are set forth for the scarfing baghouse in the specific CCP for that system

Manufacturer's maintenance instructions can be found in Appendix "D"

# CONTROL EQUIPMENT OPERATION AND MAINTENANCE

## APPLICABLE REGULATION FOR PLAN CONTENT

326 IAC 6-1-10.1(q)(4) as follows:

- (4) *Contents of the operator's training program and the frequency with which the training is held.*

## REQUESTED INFORMATION

The systems which are employed are not sophisticated, specialized training is not required. Operators are trained to operate the systems as part of their overall training program. The weekly system checks provide a cross check on operator effectiveness in operating the systems. If indicated, operators are retrained based on this feedback.

**CONTROL EQUIPMENT OPERATION AND MAINTENANCE**

**APPLICABLE REGULATION FOR PLAN CONTENT**

326 IAC 6-1-10.1(q)(5) as follows:

- (5) *A list of spare parts available at the facility.*

**REQUESTED INFORMATION**

IMS maintains a stock of routine spare parts. Other spare parts are purchased from the manufacturers as needed, on an expedited basis, if necessary. If the function of the system is impaired, the facility will be shutdown until repairs are made.

**RECOMMENDED SPARE  
PARTS FOR #1515  
JET III DUST COLLECTOR  
JOB NO. 20-4547**

<u>QUANTITY</u>	<u>PART NO.</u>	<u>DESCRIPTION</u>
	N/A	Filters
	N/A	Cages
	N/A	Venturis
5	455935	Compression Fittings - 90 Deg.
20 ft	437704	Nylon Tubing
1	620325	Solenoid Valve
2	620326	Solenoid Valve Kit
1	620337	Diaphragm Valve
2	620528	Diaphragm Valve Kit
1	669400	Timer

## CONTROL EQUIPMENT OPERATION AND MAINTENANCE

### APPLICABLE REGULATION FOR PLAN CONTENT

326 IAC 6-1-10.1(q)(6) as follows:

- (6) *A list of control equipment safety devices, for example, high temperature sensors and alarm systems, exhaust gas stream bypass system, or safety interlock system.*

### REQUESTED INFORMATION

The control equipment which IMS operates does not have safety devices other than a safety interlock system on the Baghouse Damper which is a limit. This switch must be closed to start the Baghouse.

## **CONTROL EQUIPMENT OPERATION AND MAINTENANCE**

### **APPLICABLE REGULATION FOR PLAN CONTENT**

326 IAC 6-1-10.1(q)(7) as follows:

- (7) *Monitoring and recording devices and/or instruments to monitor and record control equipment operating parameters specified in subsection (n)(4).*

### **REQUESTED INFORMATION**

There are no recording instruments, but IMS personnel routinely monitor and manually record readings for the following devices critical to operation:

1. Photohelic Pressure Gauge
2. Amp Meter

# SCARFING FACILITY

## BAGHOUSE CONTINUOUS COMPLIANCE PLAN

### APPLICABLE REGULATIONS

326 IAC 6-1-10.1(r)

(r) *Particulate matter control equipment operation, recording, and inspection procedure requirements shall be as follows:*

(1) *A CCP for a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures to be consistent with the requirements of subsection (m), such as the following:*

(A) *Operating parameters, such as the following:*

(i) *Pressure drop across the baghouse.*

(ii) *Gas flow rate at baghouse inlet.*

(iii) *Gas temperature at inlet.*

*A CCP shall identify the monitors and instrumentation, and their location, accuracy, precision, and calibration frequency. A CCP shall also include a description of any visible emission evaluation program.*

(B) *Baghouse cleaning system. A complete description of the cleaning system, including such information as intensity, duration, frequency, and method of activation.*

(C) *Baghouse inspection and maintenance schedule. The inspection schedule logs or records shall be available for inspection by the department for up to one (1) year after the date of inspection. The inspection shall include the activities and frequency of the activities. A source may request an alternative schedule based on manufacturer's recommendations or alternatives documented by the company. The revised schedule must be approved by the department. Inspections shall include the following:*

(i) *Daily inspections shall include the following:*

(AA) *Pressure drop.*

(BB) *Fan amperage.*

(CC) *Cleaning cycle.*

(DD) *Compressed air on pulse jet baghouses for values outside of the operating ranges.*

(EE) *Dust discharge equipment for proper operation.*

(FF) *General check for abnormal audible and visual conditions.*

(ii) *Weekly inspections of the following:*

(AA) *Moving parts on discharge system.*

(BB) *Bypass and isolation damper operation.*

(CC) *Bag tension.*

(DD) *Compressed air lines, oilers and filters.*

(EE) *Manometer lines.*

(FF) *Temperature indicating equipment.*

(GG) *Bag cleaning sequence.*

(HH) *Drive components on fans.*

**BAGHOUSE CONTINUOUS COMPLIANCE PLAN** (continued)

- (iii) *Monthly inspections of the following:*
  - (AA) *Bag seating condition.*
  - (BB) *Moving parts on shaker baghouse.*
  - (CC) *Fan corrosion and blade wear.*
  - (DD) *Hoses and clamps.*
  - (EE) *Bags for leaks and holes.*
  - (FF) *Bag housing for corrosion.*
- (iv) *Quarterly inspections of the following:*
  - (AA) *Bags.*
  - (BB) *Ducts for dust build-up.*
  - (CC) *Damper valves for proper setting.*
  - (DD) *Door gaskets.*
  - (EE) *Baffle plate for wear.*
- (v) *Annual inspection of the following:*
  - (AA) *Welds and bolts.*
  - (BB) *Hoppers for wear.*
  - (CC) *Cleaning parts for wear.*

International Mill Services operates a scarfing operation at Gary Works. The scarfing operation consists of a burning torch mounted on a robotic arm and two (2) cars which carry slabs past the torch. The purpose of this operation is to remove surface defects from the slab before it is rolled into sheets and coils. The process occurs within an enclosed room. The fume which is generated is captured in fixed hoods built into the roof of the enclosure. The particulate in the fume is collected in a baghouse.

The baghouse is a pulse jet type manufactured by Wheelabrator. It consists of six (6) modules. Each module has 225 bags in a 15 by 15 configuration. Each module has a solid state control board which sequences the jet pulse cleaning cycle. Each module is isolated for off-line cleaning by an outlet damper. The sequencing of the off-line cleaning is controlled by a PLC in the main control cabinet which also monitors the pressure drop in the system to assure proper operation. The control cabinet also houses a pressure gauge which displays pressure drop across the baghouse. The gauge has a range of ten inches of water with half inch gradations.

**BAGHOUSE CONTINUOUS COMPLIANCE PLAN** *(continued)*

The cleaning sequence operates by isolating one module at a time by closing a damper in the outlet duct. The damper remains closed throughout the cleaning cycle as well as for a period of time after the cycle to allow the dust removed from the bags to settle in the hopper below. The settling time is adjustable within the PLC. Typically, this is set to one minute. The cleaning sequence cycle operates continuously. Within each module the cleaning sequence is controlled by a solid state timer with ten firing circuits. Each row of tubes is connected to one of the circuits. The timer operates a pneumatic valve which passes a pulse of high pressure air through the bags. This "pulse jet" cleaning action was originally patented by Wheelabrator. The typical pulse duration is .5 seconds with a delay of about 20 seconds between the pulse for each row. These parameters are adjustable on the circuit board.

Inspection and maintenance procedures for the baghouse are as follows. Maintenance intervals are based on the recommendations of the manufacturer.

*Inspection and maintenance procedures for the baghouse are as shown in Appendix "E".*

# SCARFING FACILITY

## BAGHOUSE CONTINUOUS COMPLIANCE PLAN

### DAILY

1. Record pressure drop across baghouse from the gauge in the main control panel, and fan amperage from motor starter. Note: All modules must be on line when readings are taken.
2. Observe and record the function lights on the main control panel to assure that the cleaning sequence is operating.
3. Record plant air pressure used for cleaning system.
4. Observe dust discharge for proper operation.
5. Perform a general check for any abnormal visual or audible conditions.

### WEEKLY

1. Check baghouse doors and compressed air system for leakage.
2. Check moving parts of discharge system for normal operation.
3. Check isolation damper operation and observe proper operation of cleaning sequence by listening to pulses.

### MONTHLY

1. Check fan bearings for lubrication.
2. Observe discharge stack for signs of leakage (*EPA Method 22*).

### SEMI-ANNUALLY

1. Observe LED on timer cards for proper sequence.
2. Check outlet ducts for dust build-up.

# SCARFING FACILITY

## BAGHOUSE CONTINUOUS COMPLIANCE PLAN

### ANNUALLY

1. Remove two bags from dust collector and perform strength test (*Mullen Burst*) to decide if bags should be replaced.
2. Check bags for seating condition and holes.
3. Check fan for wear or corrosion.
4. Check housings, hoppers and ducts for holes or leaks.
5. Check dampers for proper seating.
6. Check deflector plate for wear.
7. Check discharge system for wear.
8. Clean ductwork as necessary.

A permanent record shall be made listing the results of each of the above inspections. A log of all maintenance activity shall also be kept. These records shall be retained for a minimum of one year such that a complete maintenance history is available at all times. For instance, bag replacement records shall be retained until those bags are replaced.

# DOCUMENTATION, RECORDKEEPING AND REPORTING

## APPLICABLE REGULATION FOR PLAN CONTENT:

- e) *Control Plans shall include the following:*
  - (4) *The source shall keep the following documentation to show compliance with each of its control measures and control practices:*
    - (A) *A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.*
    - (B) *For each application of water or chemical solution to roadways, the following shall be recorded:*
      - (i) *The name and location of the roadway controlled.*
      - (ii) *Application rate.*
      - (iii) *Time of each application.*
      - (iv) *Width of each application.*
      - (v) *Identification of each method of application.*
      - (vi) *Total quantity of water or chemical used for each application.*
      - (vii) *For each application of chemical solution, the concentration and identity of the chemical.*
      - (viii) *The material data safety sheets for each chemical.*
    - (C) *For application of physical or chemical control agents not covered by clause (B), the following:*
      - (i) *The name of the agent.*
      - (ii) *Location of application.*
      - (iii) *Application rate.*
      - (iv) *Total quantity of agent used.*
      - (v) *If diluted, percent of concentration.*
      - (vi) *The material data safety sheets for each chemical.*
    - (D) *A log recording incidents when control measures were not used and a statement of explanation.*
    - (E) *Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.*
    - (F) *The records required under this subdivision shall be kept and maintained for at least three (3) years and shall be available for inspection and copying by department representatives during working hours.*

## DOCUMENTATION, RECORDKEEPING AND REPORTING

### APPLICABLE REGULATION FOR PLAN CONTENT: (continued)

(G) *A quarterly report shall be submitted to the department stating the following:*

- (i) *The dates any required control measures were not implemented.*
- (ii) *A listing of those control measures.*
- (iii) *The reasons that the control measures were not implemented.*
- (iv) *Any corrective action taken.*

*This report shall be submitted to the department thirty (30) days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31.*

IMS will comply with the above regulation regarding record keeping and reporting concerning dust suppression measures for roadways under IMS control. These roadways are shown as crosshatched areas on the plant maps, Drawings 5041-5 and 5041-6.

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

**Technical Support Document (TSD) for a Part 70 Significant Permit  
Modification**

**Source Description and Location**

Source Name:	IMS Division, Tube City IMS (formerly known as International Mill Service, Inc.), an on-site contractor of US Steel-Gary Works
Source Location:	One North Broadway, Gary, IN 46402
County:	Lake
SIC Code:	primary operation (steel mill): 3312 contractor operation (business services): 7389
Operation Permit No.:	T 089-5630-00132
Operation Permit Issuance Date:	August 17, 2006
Significant Permit Modification No.:	089-23679-00132
Permit Reviewer:	Jean Boling

**Source Definition**

US Steel - Gary Works is an integrated steel mill that consists of a main mill and an on-site contractor:

- (a) US Steel, Gary Works, 089-00121, the primary operation, located at One North Broadway, Gary, IN 46402; and
- (b) IMS Division, Tube City IMS, 089-00170, the on-site contractor, located at One North Broadway, Gary, IN 46402.

IDEM has determined that US Steel, Gary Works and IMS Division, Tube City IMS are under the common control of US Steel, Gary Works. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both US Steel, Gary Works and IMS Division, Tube City IMS as one source.

Separate Part 70 Operating permits have been issued to US Steel, Gary Works (T089-7663-00121) and IMS Division, Tube City IMS (T089-5630-00132), solely for administrative purposes.

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T089-5630-00132 on August 17, 2006. This modification is the first action affecting the permit.

**County Attainment Status**

The source is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 <sup>th</sup> Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O <sub>3</sub>	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> Nonattainment Severe 17, effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .	

(a) Ozone Standards

- (1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios

under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

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 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 standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

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. See the State Rule Applicability – Entire Source section.

(b) PM<sub>2.5</sub>

U.S. EPA, in the 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 nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8, 2008, and effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(c) Other Criteria Pollutants

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

(d) Fugitive Emissions

Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

<b>Enforcement Issues</b>
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There are no pending enforcement actions related to this modification.

<b>Description of Proposed Modification</b>
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The Office of Air Quality (OAQ) has reviewed an appeal resolution letter, submitted by IMS Division, Tube City IMS (formerly known as International Mill Service, Inc.) on September 21, 2006, relating to requested changes to the Part 70 Operating Permit No. T089-5630-00132,

issued August 17, 2006. The permit is being modified to incorporate the changes that were agreed upon between IMS Division, Tube City IMS and IDEM, OAQ.

#### Permit Level Determination – Part 70

This modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because the modification requires significant changes to existing monitoring.

#### Federal Rule Applicability Determination

The federal rule applicability for this source remains unchanged as a result of this modification.

#### State Rule Applicability Determination

The state rule applicability for this source remains unchanged as a result of this modification.

#### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T089-5630-00132. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

- (a) **IDEM branch and section names and mailing address changes**  
Several of IDEM's branches and sections have been renamed. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". All references to IDEM, OAQ's mailing address have been changed as well. Therefore, IDEM has revised the branch and section names and addresses listed in the permit as follows:

Indiana Department of Environmental Management  
Permits **Administration and Support Section** ~~Branch~~, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6015~~  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management  
**Permits Administration and** Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6015~~  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management  
**Compliance and Enforcement Branch** ~~Asbestos Section~~, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6015~~  
**MC 61-53 IGCN 1003**  
Indianapolis, Indiana ~~46206-6015~~ **46204-2251**

Indiana Department of Environmental Management  
Compliance **and Enforcement** Branch, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~

**MC 61-53 IGCN 1003**

Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

Indiana Department of Environmental Management  
Compliance **and Enforcement Branch** ~~Data Section~~, Office of Air Quality  
100 North Senate Avenue, ~~P.O. Box 6045~~

**MC 61-53 IGCN 1003**

Indianapolis, Indiana ~~46206-6045~~ **46204-2251**

(b) **IDEM, OAQ Compliance and Enforcement Branch Phone and Fax Number changes**

All references to the IDEM, OAQ, Compliance and Enforcement Branch's telephone and facsimile numbers have been revised as follows: ~~317-233-5674~~ **317-233-0178** (phone) **and** ~~317-233-5967~~ **317-233-6865** (facsimile).

(c) **Section A changes**

To minimize future amendments to the issued Part 70 Permits, the OAQ decided to delete the name and/or title of the Responsible Official (RO) in Section A.1, General Information, of the permit. However, OAQ will still be evaluating if a change in RO meets the criteria specified in 326 IAC 2-7-1(34). The revised permit condition is as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a slag processing and metal recovery operation.

<del>Responsible Official:</del>	<del>Vice President and Chief Operating Officer</del>
Source Address:	One North Broadway, Gary, Indiana 46402
Mailing Address:	1155 Business Center Drive, Horsham, PA 19044-3454

\*\*\*

**Modification No. 1**

Section A.1 has been revised to remove the SIC code for metal heat treating (3398) because this is not the type of business the source operates. The SIC codes for the primary operations and the contractor operations are specifically identified and listed separate in this section for clarification. The permit has been revised as follows:

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a slag processing and metal recovery operation **as a contractor at US Steel - Gary Works.**

<del>Responsible Official:</del>	<del>Vice President and Chief Operating Officer</del>
Source Address:	One North Broadway, Gary, Indiana 46402
Mailing Address:	1155 Business Center Drive, Horsham, PA 19044-3454
General Source Phone Number:	219-885-7491
SIC Code:	<del>7389, 3398</del> <b>primary operation (steel mill): 3312</b> <b>contractor operation (business services): 7389</b>

\*\*\*

**Modification No. 2**

The company is now operating under a new name; therefore the name has been changed throughout the document from International Mill Service, Inc. to IMS Division, Tube City IMS. The

permit changes are as follows:

### Modification No. 3

Section A.2 has been modified to update and revise the source definition language. The permit has been revised as follows:

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

---

US Steel - Gary Works is an integrated steel mill that consists of a main mill and an on-site contractor:

- (a) US Steel-Gary Works, 089-00121, the primary operation, is located at, One North Broadway, Gary, IN 46402; and
- (b) ~~International Mill Service, Inc.~~ **IMS Division, Tube City IMS**, 089-00170, the on-site contractor, is located at One North Broadway, Gary, IN 46402.

Separate Part 70 **Operating** permits ~~will be~~ **have been** issued to US Steel, Gary Works (T089-7663-00121) and ~~International Mill Service, Inc.~~ **IMS Division, Tube City IMS** (T089-5630-00132) solely for administrative purposes.

### Modification No. 4

Sections A.3(b) and D.2 have been modified to remove the reference to "partial building enclosure". The descriptive information in these sections states that emissions from the slag processing plant are controlled by the partial building enclosure, slag pre-watering and water sprays. The partial building enclosure is not a pollution control device. In addition, the source requests that material transfers be added to the list of equipment and activities under the slag processing plant as item (7). The permit has been revised as follows:

#### 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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International Mill Service, Inc. consists of the following:

\*\*\*

- (b) One (1) slag processing plant, identified as M057, constructed in October 6, 1995, with a maximum capacity of 1,000 tons per hour, with emissions controlled by a ~~partial building enclosure~~, slag pre-watering and water sprays consisting of the following:
  - (1) Five (5) screen stations;
  - (2) Eighteen (18) conveyers;
  - (3) Storage piles, nine-tenths (0.9) acre with storage capacity of 16,000 tons;
  - (4) One (1) VSI crusher, constructed October 1997;
  - (5) Four (4) conveyers, constructed October 1997;
  - (6) Unpaved haul road traffic; and
  - (7) Material transfers.

\*\*\*

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

One (1) slag processing plant, identified as M057, constructed in October 6, 1995, with a maximum capacity of 1,000 tons per hour, with emissions controlled by a ~~partial building enclosure~~, slag pre-watering and water sprays consisting of the following:

- (1) Five (5) screen stations;
- (2) Eighteen (18) conveyers;
- (3) Storage piles, nine-tenths (0.9) acre with storage capacity of 16,000 tons;
- (4) One (1) VSI crusher, constructed October 1997;
- (5) Four (4) conveyers, constructed October 1997;
- (6) Unpaved haul road traffic; and
- (7) Material transfers.

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

\*\*\*

### Modification No. 5

Sections A.3(c) and D.3 have been modified to change the description of the slab scarfing plant in these sections from the "iron" slab scarfing plant to the "steel" slab scarfing plant. The permit has been revised as follows:

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

International Mill Service, Inc. consists of the following:

\*\*\*

- (c) One (1) ~~iron~~ **steel** slab scarfing plant, constructed in August 1991, with a maximum capacity of 180 tons per hour, controlled by a baghouse, ducted to the Scarfing Stack, using a 1.5 MMBtu per hour natural gas flame.

\*\*\*

## SECTION D.3 FACILITY OPERATION CONDITIONS

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

One (1) ~~iron~~ **steel** slab scarfing plant, constructed in August 1991, with a maximum capacity of 180 tons per hour, controlled by a baghouse, ducted to the Scarfing Stack, using a 1.5 MMBtu per hour natural gas flame.

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

### Modification No. 6

Section C.5 has been modified to revise the language associated with the Fugitive Dust Control Plan (FDCP). The FDCP plan has been attached to the permit and the permit has been revised as follows:

#### C.5 Fugitive Dust Emissions [326 IAC 6.8-10 and 326 IAC 6.8-11]

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- (a) Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1(d) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
- (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- \*\*\*
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan ~~submitted on June 20, 2006.~~ (See attached FDCP).

### Modification No. 7

Section D.1 has been modified to revise the compliance determination requirements language for Condition D.1.3. This language is consistent with the fugitive dust control language found in the company's other steel mill contractors' permits. The permit has been revised as follows:

#### Compliance Determination Requirements

##### D.1.3 Particulate Matter Control

---

In order to comply with Condition D.1.1, ~~the building enclosure, pre-watered kish iron and water sprays, as necessary, shall be used to control particulate emissions from the kish iron crushing, screening and conveying when the iron crushing, screening and conveying are in operation.~~ **the Permittee shall apply an initial application of water to the kish iron to control particulate matter from the iron. The water spray control for fugitive particulate emissions from the kish iron crushing, screening and conveying operations and other fugitive dust sources shall be applied in a manner and at a frequency sufficient to ensure compliance with Condition D.1.1.**

### Modification No. 8

Sections D.1 has been modified to add compliance determination, recordkeeping and reporting requirements related to fugitive emissions. Permit conditions have been renumbered accordingly. The permit has been revised as follows:

##### D.1.4 Particulate Matter (PM) [326 IAC 6.8-10] [326 IAC 2-2][326 IAC 2-1.1-5]

---

**Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.**

**Opacity from the activities shall be determined as follows:**

- (1) **Paved Roads and Parking Lots**  
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

- (A) The first will be taken at the time of emission generation.  
(B) The second will be taken five (5) seconds later.  
(C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (2) **Unpaved Roads and Parking**  
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.
- (3) **Batch Transfer**  
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (4) **Continuous Transfer**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (5) **Wind Erosion from Storage Piles**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when applications of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (6) **Wind Erosion from Exposed Areas**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

- (7) **Material Transported by Truck or Rail**  
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in plant transportation requirement.
- (8) **Material Transported by Front End Loader or Skip Hoist**  
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:
- (A) The first will be taken at the time of emission generation.
  - (B) The second will be taken five (5) seconds later.
  - (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (9) **Material Processing Limitations**  
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipments shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

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

##### **D.1.45 Visible Emissions Notations**

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- (a) Visible emission notations of the exhausts from the jaw crusher, hammer mill, screens and conveyors transfer points exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

##### **D.1.56 Record Keeping Requirements**

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- (a) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), the Permittee shall keep the following documentation to show compliance with each of its control measures and control practices:
- (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.

- (2) For each application of water or chemical solution to roadways, the following shall be recorded:**
    - (A) The name and location of the roadway controlled;**
    - (B) Application rate;**
    - (C) Time of each application;**
    - (D) Width of each application;**
    - (E) Identification of each method of application;**
    - (F) Total quantity of water or chemical used for each application;**
    - (G) For each application of chemical solution, the concentration and identity of the chemical; and**
    - (H) The material data safety sheets for each chemical.**
  - (3) For application of physical or chemical control agents not covered by 326 IAC 6.8-10-1, the following:**
    - (A) The name of the agent;**
    - (B) Location of application;**
    - (C) Application rate;**
    - (D) Total quantity of agent used;**
    - (E) If diluted, percent of concentration; and**
    - (F) The material data safety sheets for each chemical.**
  - (4) A log recording incidents when control measures were not used and a statement of explanation.**
  - (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.**
- (ab) To document compliance with Condition D.1.45, the Permittee shall maintain records of visible emission notations of the jaw crusher, hammer mill, screens and conveyors transfer points once per day.
- (bc) 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) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), a quarterly report shall be submitted, stating the following:**
  - (1) The dates any required control measures were not implemented.**
  - (2) A listing of those control measures.**

- (3) The reasons that the control measures were not implemented.
- (4) Any corrective action taken.
- (b) This report shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Modification No. 9**

Section D.2 has been modified to remove the reference in this section to "partial building enclosure" as described in Modification No.1 and revise the compliance determination requirements language for Condition D.2.4. This language is consistent with the language found in the company's other steel mill contractors' permits. The permit has been revised as follows:

#### **Compliance Determination Requirements**

##### **D.2.4 Particulate Matter Control**

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In order to comply with Condition D.2.2, ~~the partial building enclosure, pre-watered slag and water sprays, as necessary, shall be in operation and control particulate matter from the screens, conveyors and crusher at all times the screens, conveyors, crusher~~ **the Permittee shall apply an initial application of water to the slag to control particulate matter from the slag. The water spray control for fugitive particulate emissions from the screens, conveyors and crusher shall be applied in a manner and at a frequency sufficient to ensure compliance with Condition D.2.2.**

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#### **Modification No. 10**

Sections D.2 has been modified to add compliance determination, recordkeeping and reporting requirements related to fugitive emissions. Permit conditions have been renumbered accordingly. The permit has been revised as follows:

##### **D.2.5 Particulate Matter (PM) [326 IAC 6.8-10] [326 IAC 2-2][326 IAC 2-1.1-5]**

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**Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.5 shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.**

**Opacity from the activities shall be determined as follows:**

- (1) **Paved Roads and Parking Lots**  
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:
  - (A) The first will be taken at the time of emission generation.
  - (B) The second will be taken five (5) seconds later.

- (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.**

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (2) Unpaved Roads and Parking**  
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.
- (3) Batch Transfer**  
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (4) Continuous Transfer**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (5) Wind Erosion from Storage Piles**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when applications of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (6) Wind Erosion from Exposed Areas**  
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
- (7) Material Transported by Truck or Rail**  
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in plant transportation requirement.

- (8) Material Transported by Front End Loader or Skip Hoist**  
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:

- (A) The first will be taken at the time of emission generation.**
- (B) The second will be taken five (5) seconds later.**
- (C) The third will be taken five (5) seconds later or ten (10) seconds after the first.**

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (9) Material Processing Limitations**  
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipments shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

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

##### **D.2.56 Visible Emissions Notations**

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- (a) Visible emission notations of the screens, conveyor transfer points, and crusher exhaust stacks shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.**

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

##### **D.2.67 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.1 the Permittee shall maintain records of the raw material input for the slag processing plant M057.**
- (b) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), the Permittee shall keep the following documentation to show compliance with each of its control measures and control practices:**
  - (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.**
  - (2) For each application of water or chemical solution to roadways, the following shall be recorded:**
    - (A) The name and location of the roadway controlled;**
    - (B) Application rate;**

- (C) Time of each application;
  - (D) Width of each application;
  - (E) Identification of each method of application;
  - (F) Total quantity of water or chemical used for each application;
  - (G) For each application of chemical solution, the concentration and identity of the chemical; and
  - (H) The material data safety sheets for each chemical.
- (3) For application of physical or chemical control agents not covered by 326 IAC 6.8-10-1, the following:
- (A) The name of the agent;
  - (B) Location of application;
  - (C) Application rate;
  - (D) Total quantity of agent used;
  - (E) If diluted, percent of concentration; and
  - (F) The material data safety sheets for each chemical.
- (4) A log recording incidents when control measures were not used and a statement of explanation.
- (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.
- (bc) To document compliance with Condition D.2.56, the Permittee shall maintain records of visible emission notations of the screens, conveyor transfer points and crusher exhaust stacks once per day.
- (ed) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.78 Reporting Requirements**

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- (a) ~~A summary of the information to document compliance with D.2.1, shall be submitted to the addresses listed in Section C - general reporting requirements of this permit using the reporting forms located at the end of this permit or other 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).~~
- (a) A summary of the information to document compliance with D.2.1 shall be submitted using the reporting form located at the end of this permit, or their equivalent
- (b) Pursuant to 326 IAC 6.8-10 (Lake County Fugitive Particulate Matter), a quarterly report shall be submitted, stating the following:

- (1) **The dates any required control measures were not implemented.**
  - (2) **A listing of those control measures.**
  - (3) **The reasons that the control measures were not implemented.**
  - (4) **Any corrective action taken.**
- (c) **These reports shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The reports submitted by the Permittee require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**

<b>Conclusion and Recommendation</b>
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The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 089-23679-00132. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

## SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

**TO:** Michael Connolly  
USS - IMS Division, Tube City IMS  
1155 Business Center Drive  
Horsham, PA 191044

**DATE:** April 19, 2010

**FROM:** Matt Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

**SUBJECT:** Final Decision  
Part 70  
089-23679-00132

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:  
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at [jbrush@idem.IN.gov](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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**Governor**

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Indianapolis, Indiana 46204  
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Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

April 19, 2010

TO: Westchester Public Library

From: Matthew Stuckey, Branch Chief  
Permits Branch  
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

**Permit**                      **Applicant Name:**      **USS - IMS Division, Tube City IMS**  
   **Number:**              **089-23674-00132**

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures  
Final Library.dot 11/30/07

# Mail Code 61-53

IDEM Staff	CDENNY 4/19/2010 USS - IMS Division, Tube City IMS 089-23679-00132 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Mike Connolly USS - IMS Division, Tube City IMS 1155 Business Ctr Dr Horsham PA 19044 (Source CAATS)										
2		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
3		Gary Mayors Office 401 Broadway # 203 Gary IN 46402 (Local Official)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
9		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
13		Northwestern In Regional Planning Com (NIRPC) 6100 Southport Road Portage IN 46368 (Affected Party)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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# Mail Code 61-53

IDEM Staff	CDENNY 4/19/2010 USS - IMS Division, Tube City IMS 089-23679-00132 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Robert 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
2		General Manager US Steel One North Broadway Gary IN 46402 (Source ? addl contact)										
3		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
4		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)										
5		Westchester Public Library 200 West Indiana Ave Chesterton IN 46304 (Library)										
6		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
7		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
8												
9												
10												
11												
12												
13												
14												
15												

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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