



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: October 22, 2009
RE: U.S. Steel - East Chicago Tin Products / 089-27328-00300
FROM: Matthew Stuckey, Deputy 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 13-15-5-3, this permit 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

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Commissioner

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

**Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY**

**U.S. Steel-East Chicago Tin Products
101 East 129th Street
East Chicago, Indiana 46312**

(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.

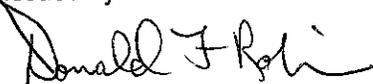
Operation Permit No.: T089-27328-00300	
Issued by:  Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 22, 2009 Expiration Date: October 22, 2014

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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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary tin mill.

Source Address:	101 East 129th Street, East Chicago, Indiana 46312
Mailing Address:	One North Broadway, Mail Station 70A, East Chicago, IN 46312
General Source Phone Number:	219-888-6995
SIC Code:	3313 and 3316
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD and Emission Offset and Nonattainment New Source Review Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

(a) Continuous Pickling Line

- (1) One (1) Pickle Line constructed in 1952 consisting of four (4) HCl process tanks and a water rinse tank with acid fumes controlled by one (1) packed tower scrubber with air flow of 22,000 acfm exhausting through stack (S5A).

(b) 6- Stand Cold Reduction Tandem Mill

- (1) One (1) 6 Stand Tandem Mill (emission unit EC-CR) containing six (6) stands (EC-CR0000) constructed in 1956 having a maximum capacity of 120 tons per hour. Oily mist is controlled using mist eliminator (EC-CR CD1) exhausting through two (2) stacks (S7A and S7A1).

(c) Continuous Annealing Line

- (1) One (1) Continuous Annealing Line (emission unit EC-CA) constructed in 1960 having a maximum capacity of 56 tons per hour consisting of the following:
 - (A) Two (2) alkali cleaning tanks (emission unit ECCA0020) with emissions controlled using a gas/fume washer (Rotoclone Type "N") (EC-CA CD1) exhausting through one (1) stack (S7D).
 - (B) One (1) non-contact brush scrubber (emission unit ECCA0021) having emissions exhausting into the building.

- (C) One (1) natural gas fired continuous annealing furnace having a maximum heat input capacity of 70 MMBtu per hour with emissions exhausting through one (1) stack (S7C).

(d) Tin Free Steel Line (Chrome Line)

- (1) One (1) Tin Free Steel Line (Chrome Line) (emission unit EC-CT) constructed in 1964 having a maximum capacity of 33.7 tons per hour consisting of the following:
 - (A) One (1) caustic NaOH cleaner tank (EC-CT0050) using a cleaning solution containing caustic soda at a maximum of 59.0 pounds per hour to clean steel coils. Emissions are controlled using a gas/fume washer (Rotoclone Type "N") exhausting through one (1) stack (S7F).
 - (B) One (1) Pickling process tank (EC-CT0051) using a pickling solution containing sulfuric acid at a maximum of 3.0 pounds per hour to process steel coils. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (C) One (1) Chrome Electroplating process (EC-CT0052) using a plating coating solution containing chromic acid at a maximum of 20.0 pounds per hour, sulfuric acid and silica fluoride at a maximum of 0.6 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (D) One (1) Chemical Treatment Tank (EC-CT0053) using a solution containing chromic acid at a maximum of 3.0 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (E) One (1) Chemical Treatment Rinse Tank (EC-CT0054) using water to rinse coils after chemical treatment with chromic acid. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).

(e) Electrolytic Tinning Line (Tin Line)

- (1) One (1) Electrolytic Tinning Line (Tin Line) constructed in 1956 having a maximum capacity of 48.5 tons per hour consisting of the following:
 - (A) Cleaning and Pickle Section:
 - (i) One (1) caustic NaOH cleaning tank (EC-TL0060) using a solution containing caustic soda at a maximum of 5.0 pounds per hour. Emissions are controlled using one (1) packed bed wet scrubber (EC-TL CD 1).
 - (ii) One (1) pickle tank (EC-TL 0061) using a solution containing sulfuric acid at a maximum of 6.0 pounds per hour. Emissions are controlled using one (1) packed bed wet Scrubber (EC-TL CD2).
 - (iii) Both scrubbers in the Cleaning and Pickling Section exhaust through a common stack (S7G).

- (B) Tin Plating Section (Halogen Process):
- (i) One (1) set of tin plating cells 1-7 (SC-TL0063) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD3).
 - (ii) One (1) set of tin plating cells 8-18 (SC-TL0062) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD4).
 - (iii) One (1) set of tin plating cells 19-32 (SC-TL0064) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD5).
 - (iv) The three (3) sets of plating cells (1-7, 8-18 and 19-32) combined use solutions containing sodium bifluoride at a maximum rate of 110.0 pounds per hour, sodium ferro cyanide at a maximum of 5.0 pounds per hour, polyethylene glycol at a maximum of 0.1 pounds per hour and hydrochloric acid at a maximum of 69.0 pounds per hour.
 - (v) All three (3) scrubbers in the Tin Plating Section exhaust through a common stack (S7H).
- (C) One (1) Chemical Treatment Section:
- (i) Coils exiting the Tin Plating Section may be treated with a solution containing sodium bichromate/dichromate at a maximum of 37.0 pounds per hour. Emissions from the one (1) chemical treatment tank are controlled by a packed bed scrubber (EC-TL CD6), exhausting through one (1) Stack (S7I).

(f) Batch Annealing Operation

- (1) One (1) Batch Annealing Operation (emission unit EC-BA) constructed in 1956 with a capacity of 48.5 tons per hour consisting of five (5) natural gas fired furnaces having a maximum heat input capacity of 16 MMBtu per hour each and nine (9) bases (ECBA0030 through ECBA0038). Emissions exhaust into the building and through the roof vent (V7A).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Specifically regulated insignificant activities
- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
 - (2) Cleaners and solvents characterized as:
 - (A) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
 - (B) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo

Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit);the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months.[326 IAC 8-3]

- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: Brazing, Cutting torches, Soldering, and Welding. [326 IAC 6-3-2]
- (4) 2- Stand Tin Temper Mill
One (1) Temper mill (emission unit EC-TM) containing two (2) stands (EC-TM 0042), constructed in 1956 having a maximum capacity of 48.5 tons per hour. Emissions are controlled by a baghouse (EC-TM CD1) exhausting inside the building. The baghouse was installed to improve the quality of the coils processed through the Temper Mill. [326 IAC 6-3-2]
- (5) One (1) Electrolytic Cleaning line, (emission Unit EC-EC), constructed in 1956, having a maximum capacity of 48.5 tons per hour. The line consists of caustic cleaning tanks (EC-EC0010) and a brush scrubber (EC-EC0011). Emissions are controlled using a gas/fume washer (Rotoclone Type "N") (EC-EC CD1) exhausting through one (1) stack (S7B). [326 IAC 6-3-2]
- (6) RCCP Recoil and Inspection Line [326 IAC 6-3-2]

One (1) Recoil and Inspection Line RCCP (emission unit EC-RI) constructed in 1956, consisting of the following:
 - (A) One (1) Recoiler Unit (EC-RC) where coils are unwound for surface quality and edge alignment inspections and then recoiled for further processing or shipment to customers.
 - (B) One (1) Electrostatic Oiler, (emission unit EC-RI0040) with emissions exhausting to one (1) Stack (S7J).

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

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

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

SECTION B GENERAL CONDITIONS

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

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, T089-27328-00300, 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]

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]

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)]

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)]

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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

- (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. All 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]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.
- (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]

- (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. Any emergencies that have been previously reported pursuant to paragraph (b) (5) of this condition and certified by an "responsible official" need only referenced by the date of the original 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 T089-27328-00300 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]

- (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 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)]

- (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]

- (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)]

- (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]

- (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]

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

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]

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]

- (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 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 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.

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

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

C.6 Stack Height [326 IAC 1-7]

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.

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

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. 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 Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

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

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

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

Indiana Department of Environmental Management
Compliance 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]

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)]

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 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

- (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.13 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.14 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; and/or
- (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (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 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.16 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]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year as follows:
 - (1) starting in 2004 and every three (3) years thereafter, and
 - (2) any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.
- (b) 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 all 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 purpose of fee assessment.

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

- (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 or ninety (90) days of initial start-up, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (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) 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.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

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

SECTION D.1

FACILITY OPERATION CONDITION

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

(a) Continuous Pickling Line

- (1) One (1) Pickle Line constructed in 1952 consisting of four (4) HCl process tanks and a water rinse tank with acid fumes controlled by one (1) packed tower scrubber with air flow of 22,000 acfm exhausting through stack (S5A).

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Pickle Line (S5A) shall not exceed 56.12 pounds per hour when operating at a process weight rate of 160 tons per hour.

The pound per hour limitation was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.2

FACILITY OPERATION CONDITIONS

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

(b) 6- Stand Cold Reduction Tandem Mill

- (1) One (1) 6 Stand Tandem Mill (emission unit EC-CR) containing six (6) stands (EC-CR0000) constructed in 1956 having a maximum capacity of 120 tons per hour. Oily mist is controlled using mist eliminator (EC-CR CD1) exhausting through two (2) stacks (S7A and S7A1).

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the 6-Stand Tandem Mill shall not exceed 53.13 pounds per hour when operating at a process weight rate of 120 tons per hour.

The pound per hour limitation was calculated using the following equation:

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

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

Compliance Determination Requirements

D.2.2 Oily Mist Control

The mist eliminator shall be in operation at all times the 6-Stand Tandem Mill is in operation to control oily mist.

Section D.3

FACILITY OPERATION CONDITIONS

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

(c) Continuous Annealing Line

- (1) One (1) Continuous Annealing Line (emission unit EC-CA) constructed in 1960 having a maximum capacity of 56 tons per hour consisting of the following:
 - (A) Two (2) alkali cleaning tanks (emission unit ECCA0020) with emissions controlled using a gas/fume washer (Rotoclone Type "N") (EC-CA CD1) exhausting through one (1) stack (S7D).
 - (B) One (1) non-contact brush scrubber (emission unit ECCA0021) having emissions exhausting into the building.
 - (C) One (1) natural gas fired continuous annealing furnace having a maximum heat input capacity of 70 MMBtu per hour with emissions exhausting through one (1) stack (S7C).

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Continuous Annealing Line shall not exceed 45.64 pounds per hour when operating at a process weight rate of 56 tons per hour.

The pound per hour limitation was calculated using the following equation:

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

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

Section D.4

FACILITY OPERATION CONDITIONS

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

(d) Tin Free Steel Line (Chrome Line)

- (1) One (1) Tin Free Steel Line (Chrome Line) (emission unit EC-CT) constructed in 1964 having a maximum capacity of 33.7 tons per hour consisting of the following:
 - (A) One (1) caustic NaOH cleaner tank (EC-CT0050) using a cleaning solution containing caustic soda at a maximum of 59.0 pounds per hour to clean steel coils. Emissions are controlled using a gas/fume washer (Rotoclone Type "N") exhausting through one (1) stack (S7F).
 - (B) One (1) Pickling process tank (EC-CT0051) using a pickling solution containing sulfuric acid at a maximum of 3.0 pounds per hour to process steel coils. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (C) One (1) Chrome Electroplating process (EC-CT0052) using a plating coating solution containing chromic acid at a maximum of 20.0 pounds per hour, sulfuric acid and silica fluoride at a maximum of 0.6 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (D) One (1) Chemical Treatment Tank (EC-CT0053) using a solution containing chromic acid at a maximum of 3.0 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (E) One (1) Chemical Treatment Rinse Tank (EC-CT0054) using water to rinse coils after chemical treatment with chromic acid. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Tin Free Steel Line (Chrome Line) shall not exceed ~~40.98 pounds per hour when operating at a process weight rate of 33.7 tons per hour.~~

The pound per hour limitation was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

where

E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Section D.5

FACILITY OPERATION CONDITIONS

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

(e) Electrolytic Tinning Line (Tin Line)

- (1) One (1) Electrolytic Tinning Line (Tin Line) constructed in 1956 having a maximum capacity of 48.5 tons per hour consisting of the following:
 - (A) Cleaning and Pickle Section:
 - (i) One (1) caustic NaOH cleaning tank (EC-TL0060) using a solution containing caustic soda at a maximum of 5.0 pounds per hour. Emissions are controlled using one (1) packed bed wet scrubber (EC-TL CD 1).
 - (ii) One (1) pickle tank (EC-TL 0061), using a solution containing sulfuric acid at a maximum of 6.0 pounds per hour. Emissions are controlled using one (1) packed bed wet Scrubber (EC-TL CD2).
 - (iii) Both scrubbers in the Cleaning and Pickling Section exhaust through a common stack (S7G).
 - (B) Tin Plating Section (Halogen Process):
 - (i) One (1) set of tin plating cells 1-7 (SC-TL0063) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD3).
 - (ii) One (1) set of tin plating cells 8-18 (SC-TL0062) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD4).
 - (iii) One (1) set of tin plating cells 19-32 (SC-TL0064) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD5).
 - (iv) The three (3) sets of plating cells (1-7, 8-18 and 19-32) combined use solutions containing sodium bifluoride at a maximum rate of 110.0 pounds per hour, sodium ferro cyanide at a maximum of 5.0 pounds per hour, polyethylene glycol at a maximum of 0.1 pounds per hour and hydrochloric acid at a maximum of 69.0 pounds per hour.
 - (v) All three (3) scrubbers in the Tin Plating Section exhaust through a common stack (S7H).
 - (C) One (1) Chemical Treatment Section:
 - (i) Coils exiting the Tin Plating Section may be treated with a solution containing sodium bichromate/dichromate at a maximum of 37.0 pounds per hour. Emissions from the one (1) chemical treatment tank are controlled by a packed bed scrubber (EC-TL CD6), exhausting through one (1) Stack (S7I).

(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.5.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Electrolytic Tinning Line (Tin Line) shall not exceed 44.29 pounds per hour when operating at a process weight rate of 48.5 tons per hour.

The pound per hour limitation was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Section D.6 FACILITY OPERATION CONDITIONS

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

(f) Batch Annealing Operation

- (1) One (1) Batch Annealing Operation (emission unit EC-BA) constructed in 1956 with a capacity of 48.5 tons per hour consisting of five (5) natural gas fired furnaces having a maximum heat input capacity of 16 MMBtu per hour each and nine (9) bases (ECBA0030 through ECBA0038). Emissions exhaust into the building and through the roof vent (V7A).

(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 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Batch Annealing Operations shall not exceed 44.29 pounds per hour when operating at a process weight rate of 48.5 tons per hour.

The pound per hour limitation was calculated using the following equation:

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

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

Section D.7 FACILITY OPERATION CONDITIONS

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

- (a) Specifically regulated insignificant activities
- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
 - (2) Cleaners and solvents characterized as:
 - (A) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or
 - (B) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3]
 - (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: Brazing, Cutting torches, Soldering, and Welding. [326 IAC 6-3-2]
 - (4) 2- Stand Tin Temper Mill
One (1) Temper mill (emission unit EC-TM) containing two (2) stands (EC-TM 0042), constructed in 1956 having a maximum capacity of 48.5 tons per hour. Emissions are controlled by a baghouse (EC-TM CD1) exhausting inside the building. The baghouse was installed to improve the quality of the coils processed through the Temper Mill. [326 IAC 6-3-2]
 - (5) One (1) Electrolytic Cleaning line, (emission Unit EC-EC), constructed in 1956, having a maximum capacity of 48.5 tons per hour. The line consists of caustic cleaning tanks (EC-EC0010) and a brush scrubber (EC-EC0011). Emissions are controlled using a gas/fume washer (Rotoclone Type "N") (EC-EC CD1) exhausting through one (1) stack (S7B). [326 IAC 6-3-2]
 - (6) RCCP Recoil and Inspection Line [326 IAC 6-3-2]
One (1) Recoil and Inspection Line RCCP (emission unit EC-RI) constructed in 1956, consisting of the following:
 - (A) One (1) Recoiler Unit (EC-RC) where coils are unwound for surface quality and edge alignment inspections and then recoiled for further processing or shipment to customers.
 - (B) One (1) Electrostatic Oiler, (emission unit EC-RI0040) with emissions exhausting to one (1) Stack (S7J).

(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 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions rate from the 2-Stand Temper Mill, the Electrolytic Cleaning line, the RCCP Recoil and Inspection Line and the Brazing, Cutting torches, Soldering, and Welding shall not exceed the pounds per hour emission rate established as "E" in the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.7.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.7.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), the users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Clark, Floyd, Lake, and Porter Counties, except for solvents intended to be used to clean electronic components shall do the following:

- (a) On and after November 1, 1999, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) On and after May 1, 2001, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.

- (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) All records required by 326 IAC 8-3-8 (d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

SECTION E.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)][326 IAC 12-1][40 CFR 63, Subpart CCC]

Affected Emissions Unit Description:

(a) Continuous Pickling Line

- (1) One (1) Pickle Line constructed in 1952 consisting of four (4) HCl process tanks and a water rinse tank with acid fumes controlled by one (1) packed tower scrubber with air flow of 22,000 acfm exhausting through stack (S5A).

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

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63. 63.1155, the Permittee shall comply with the provisions of 40 CFR Part 63 Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1 for the Continuous Pickling Line except as otherwise specified in 40 CFR Part 63, Subpart CCC.

- (b) Pursuant to 40 CFR 60.10, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants [326 IAC 20-1-1] [40 CFR 63, Subpart CCC]

The Permittee which engages in the steel pickling-HCl process shall comply with the following provisions of 40 CFR 63, Subpart CCC (included as Attachment A of this permit), with a compliance date of June 22, 2001:

- (1) 40 CFR 63.1155
- (2) 40 CFR 63.1156
- (3) 40 CFR 63.1157(a)
- (4) 40 CFR 63.1159(b)
- (5) 40 CFR 63.1160
- (6) 40 CFR 63.1161(a), (b) and (d)
- (7) 40 CFR 63.1162(a) and (c)
- (8) 40 CFR 63.1163
- (9) 40 CFR 63.1164
- (10) 40 CFR 63.1165
- (11) Table 1 to Subpart CCC of Part 63

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

Source Name: U.S. Steel-East Chicago Tin Products
Source Address: 101 East 129th Street, East Chicago, Indiana 46312
Mailing Address: One North Broadway, Mail Station 70A, East Chicago, IN 46312
Part 70 Permit No.: T089-27328-00300

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: U.S. Steel-East Chicago Tin Products
Source Address: 101 East 129th Street, East Chicago, Indiana 46312
Mailing Address: One North Broadway, Mail Station 70A, East Chicago, IN 46312
Part 70 Permit No.: T089-27328-00300

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| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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 ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Source Name: U.S. Steel-East Chicago Tin Products
Source Address: 101 East 129th Street, East Chicago, Indiana 46312
Mailing Address: One North Broadway, Mail Station 70A, East Chicago, IN 46312
Part 70 Permit No.: T089-27328-00300

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

Page 1 of 2

<p>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".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

Subpart CCC—National Emission Standards for Hazardous Air Pollutants for Steel Pickling—HCl Process Facilities and Hydrochloric Acid Regeneration Plants

Source: 64 FR 33218, June 22, 1999, unless otherwise noted.

§ 63.1155 Applicability.

(a) The provisions of this subpart apply to the following facilities and plants that are major sources for hazardous air pollutants (HAP) or are parts of facilities that are major sources for HAP:

(1) All new and existing steel pickling facilities that pickle carbon steel using hydrochloric acid solution that contains 6 percent or more by weight HCl and is at a temperature of 100 °F or higher; and

(2) All new and existing hydrochloric acid regeneration plants.

(3) The provisions of this subpart do not apply to facilities that pickle carbon steel without using hydrochloric acid, to facilities that pickle only specialty steel, or to acid regeneration plants that regenerate only acids other than hydrochloric acid.

(b) For the purposes of implementing this subpart, the affected sources at a facility or plant subject to this subpart are as follows: Continuous and batch pickling lines, hydrochloric acid regeneration plants, and hydrochloric acid storage vessels.

(c) Table 1 to this subpart specifies the provisions of this part 63, subpart A that apply and those that do not apply to owners and operators of steel pickling facilities and hydrochloric acid regeneration plants subject to this subpart.

§ 63.1156 Definitions.

Terms used in this subpart are defined in the Clean Air Act, in subpart A of this part, or in this section as follows:

Batch pickling line means the collection of equipment and tanks configured for pickling metal in any form but usually in discrete shapes where the material is lowered in batches into a bath of acid solution, allowed to remain until the scale is dissolved, then removed from the solution, drained, and rinsed by spraying or immersion in one or more rinse tanks to remove residual acid.

Carbon steel means steel that contains approximately 2 percent or less carbon, 1.65 percent or less manganese, 0.6 percent or less silicon, and 0.6 percent or less copper.

Closed-vent system means a system that is not open to the atmosphere and that is composed of piping, ductwork, connections, and, if necessary, flow-inducing devices that transport emissions from a process unit or piece of equipment (e.g., pumps, pressure relief devices, sampling connections, open-ended valves or lines, connectors, and instrumentation systems) back into a closed system or into any device that is capable of reducing or collecting emissions.

Continuous pickling line means the collection of equipment and tanks configured for pickling metal strip, rod, wire, tube, or pipe that is passed through an acid solution in a continuous or nearly continuous manner and rinsed in another tank or series of tanks to remove residual acid. This definition includes continuous spray towers.

Hydrochloric acid regeneration plant means the collection of equipment and processes configured to reconstitute fresh hydrochloric acid pickling solution from spent pickle liquor using a thermal treatment process.

Hydrochloric acid regeneration plant production mode means operation under conditions that result in production of usable regenerated acid or iron oxide.

Hydrochloric acid storage vessel means a stationary vessel used for the bulk containment of virgin or regenerated hydrochloric acid.

Responsible maintenance official means a person designated by the owner or operator as having the knowledge and the authority to sign records and reports required under this rule.

Specialty steel means a category of steel that includes silicon electrical, alloy, tool, and stainless steels.

Spray tower means an enclosed vertical tower in which acid pickling solution is sprayed onto moving steel strip in multiple vertical passes.

Steel pickling means the chemical removal of iron oxide mill scale that is formed on steel surfaces during hot rolling or hot forming of semi-finished steel products through contact with an aqueous solution of acid where such contact occurs prior to shaping or coating of the finished steel product. This definition does not include removal of light rust or scale from finished steel products or activation of the metal surface prior to plating or coating.

Steel pickling facility means any facility that operates one or more batch or continuous steel pickling lines.

§ 63.1157 Emission standards for existing sources.

(a) *Pickling lines*. No owner or operator of an existing affected continuous or batch pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (1) Any gases that contain HCl in a concentration in excess of 18 parts per million by volume (ppmv); or
- (2) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

(b) *Hydrochloric acid regeneration plants*. (1) No owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain HCl in a concentration greater than 25 ppmv.

(2) In addition to the requirement of paragraph (b)(1) of this section, no owner or operator of an existing affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain chlorine (Cl₂) in a concentration in excess of either 6 ppmv or an alternative source-specific maximum concentration. The source-specific maximum concentration standard shall be established according to §63.1161(c)(2) of this subpart.

§ 63.1158 Emission standards for new or reconstructed sources.

(a) *Pickling lines* —(1) *Continuous pickling lines*. No owner or operator of a new or reconstructed affected continuous pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (i) Any gases that contain HCl in a concentration in excess of 6 ppmv; or
- (ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 99 percent.

(2) *Batch pickling lines*. No owner or operator of a new or reconstructed affected batch pickling line at a steel pickling facility shall cause or allow to be discharged into the atmosphere from the affected pickling line:

- (i) Any gases that contain HCl in a concentration in excess of 18 ppmv; or
- (ii) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

(b) *Hydrochloric acid regeneration plants.* (1) No owner or operator of a new or reconstructed affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain HCl in a concentration greater than 12 ppmv.

(2) In addition to the requirement of paragraph (b)(1) of this section, no owner or operator of a new or reconstructed affected plant shall cause or allow to be discharged into the atmosphere from the affected plant any gases that contain Cl₂ in a concentration in excess of 6 ppmv.

§ 63.1159 Operational and equipment standards for existing, new, or reconstructed sources.

(a) *Hydrochloric acid regeneration plant.* The owner or operator of an affected plant must operate the affected plant at all times while in production mode in a manner that minimizes the proportion of excess air fed to the process and maximizes the process offgas temperature consistent with producing usable regenerated acid or iron oxide.

(b) *Hydrochloric acid storage vessels.* The owner or operator of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

§ 63.1160 Compliance dates and maintenance requirements.

(a) *Compliance dates.* (1) The owner or operator of an affected existing steel pickling facility and/or hydrochloric acid regeneration plant subject to this subpart shall achieve initial compliance with the requirements of this subpart no later than June 22, 2001.

(2) The owner or operator of a new or reconstructed steel pickling facility and/or hydrochloric acid regeneration plant subject to this subpart that commences construction or reconstruction after September 18, 1997, shall achieve compliance with the requirements of this subpart immediately upon startup of operations or by June 22, 1999, whichever is later.

(b) *Maintenance requirements.* (1) The owner or operator of an affected source shall comply with the operation and maintenance requirements prescribed under §63.6(e) of subpart A of this part.

(2) In addition to the requirements specified in paragraph (b)(1) of this section, the owner or operator shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's title V permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

(i) Require monitoring and recording the pressure drop across the scrubber once per shift while the scrubber is operating in order to identify changes that may indicate a need for maintenance;

(ii) Require the manufacturer's recommended maintenance at the recommended intervals on fresh solvent pumps, recirculating pumps, discharge pumps, and other liquid pumps, in addition to exhaust system and scrubber fans and motors associated with those pumps and fans;

(iii) Require cleaning of the scrubber internals and mist eliminators at intervals sufficient to prevent buildup of solids or other fouling;

(iv) Require an inspection of each scrubber at intervals of no less than 3 months with:

(A) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;

(B) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other internal components;

(C) Repair or replacement of droplet eliminator elements as needed;

(D) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and

(E) Adjustment of damper settings for consistency with the required air flow.

(v) If the scrubber is not equipped with a viewport or access hatch allowing visual inspection, alternate means of inspection approved by the Administrator may be used.

(vi) The owner or operator shall initiate procedures for corrective action within 1 working day of detection of an operating problem and complete all corrective actions as soon as practicable. Procedures to be initiated are the applicable actions that are specified in the maintenance plan. Failure to initiate or provide appropriate repair, replacement, or other corrective action is a violation of the maintenance requirement of this subpart.

(vii) The owner or operator shall maintain a record of each inspection, including each item identified in paragraph (b)(2)(iv) of this section, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

(3) The owner or operator of each hydrochloric acid regeneration plant shall develop and implement a written maintenance program. The program shall require:

(i) Performance of the manufacturer's recommended maintenance at the recommended intervals on all required systems and components;

(ii) Initiation of procedures for appropriate and timely repair, replacement, or other corrective action within 1 working day of detection; and

(iii) Maintenance of a daily record, signed by a responsible maintenance official, showing the date of each inspection for each requirement, the problems found, a description of the repair, replacement, or other action taken, and the date of repair or replacement.

§ 63.1161 Performance testing and test methods.

(a) *Demonstration of compliance.* The owner or operator shall conduct an initial performance test for each process or emission control device to determine and demonstrate compliance with the applicable emission limitation according to the requirements in §63.7 of subpart A of this part and in this section.

(1) Following approval of the site-specific test plan, the owner or operator shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device (to determine compliance with the applicable collection efficiency standard) or measure the concentration of HCl (and Cl₂ for hydrochloric acid regeneration plants) in gases exiting the process or the emission control device (to determine compliance with the applicable emission concentration standard).

(2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.

(3) Compliance is achieved if either the average collection efficiency as determined by the HCl mass flows at the control device inlet and outlet is greater than or equal to the applicable collection efficiency standard, or the average measured concentration of HCl or Cl₂ exiting the process or the emission control device is less than or equal to the applicable emission concentration standard.

(b) *Establishment of scrubber operating parameters.* During the performance test for each emission control device, the owner or operator using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation, the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The owner or operator shall determine the operating parameter monitoring values as the

averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per paragraph (a)(2) of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(c) *Establishment of hydrochloric acid regeneration plant operating parameters.* (1) During the performance test for hydrochloric acid regeneration plants, the owner or operator shall establish site-specific operating parameter values for the minimum process offgas temperature and the maximum proportion of excess air fed to the process as described in §63.1162(b)(1) of this subpart. During the emission test, each operating parameter must be monitored and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes for parameters that are monitored continuously. Amount of iron in the spent pickle liquor shall be determined for each run by sampling the liquor every 15 minutes and analyzing a composite of the samples. The owner or operator shall determine the compliant monitoring values as the averages of the values recorded during any of the runs for which results are used to establish the emission concentration per paragraph (a)(2) of this section. An owner or operator may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, an owner or operator may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(2) During this performance test, the owner or operator of an existing affected plant may establish an alternative concentration standard if the owner or operator can demonstrate to the Administrator's satisfaction that the plant cannot meet a concentration limitation for Cl₂ of 6 ppmv when operated within its design parameters. The alternative concentration standard shall be established through performance testing while the plant is operated at maximum design temperature and with the minimum proportion of excess air that allows production of iron oxide of acceptable quality while measuring the Cl₂ concentration in the process exhaust gas. The measured concentration shall be the concentration standard for that plant.

(d) *Test methods.* (1) The following test methods in appendix A of 40 CFR part 60 shall be used to determine compliance under §63.1157(a), §63.1157(b), §63.1158(a), and §63.1158(b) of this subpart:

(i) Method 1, to determine the number and location of sampling points, with the exception that no traverse point shall be within one inch of the stack or duct wall;

(ii) Method 2, to determine gas velocity and volumetric flow rate;

(iii) Method 3, to determine the molecular weight of the stack gas;

(iv) Method 4, to determine the moisture content of the stack gas; and

(v) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources—Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere, and also to determine the concentration of Cl₂ discharged to the atmosphere from acid regeneration plants. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (30 dry standard cubic feet). The concentrations of HCl and Cl₂ shall be calculated for each run as follows:

$$C_{\text{HCl}}(\text{ppmv}) = 0.659 C_{\text{HCl}}(\text{mg/dscm}),$$

$$\text{and } C_{\text{Cl}_2}(\text{ppmv}) = 0.339 C_{\text{Cl}_2}(\text{mg/dscm}),$$

where C(ppmv) is concentration in ppmv and C(mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(2) The owner or operator may use equivalent alternative measurement methods approved by the Administrator.

§ 63.1162 Monitoring requirements.

(a) The owner or operator of a new, reconstructed, or existing steel pickling facility or acid regeneration plant subject to this subpart shall:

(1) Conduct performance tests to measure the HCl mass flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in §63.1161 of this subpart. Performance tests shall be conducted either annually or according to an alternative schedule that is approved by the applicable permitting authority, but no less frequently than every 2 1/2 years or twice per title V permit term. If any performance test shows that the HCl emission limitation is being exceeded, then the owner or operator is in violation of the emission limit.

(2) In addition to conducting performance tests, if a wet scrubber is used as the emission control device, install, operate, and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in §63.1160(b)(2) of this subpart.

(3) If an emission control device other than a wet scrubber is used, install, operate, and maintain systems for the measurement and recording of the appropriate operating parameters.

(4) Failure to record each of the operating parameters listed in paragraph (a)(2) of this section is a violation of the monitoring requirements of this subpart.

(5) Each monitoring device shall be certified by the manufacturer to be accurate to within 5 percent and shall be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

(6) The owner or operator may develop and implement alternative monitoring requirements subject to approval by the Administrator.

(b) The owner or operator of a new, reconstructed, or existing acid regeneration plant subject to this subpart shall also install, operate, and maintain systems for the measurement and recording of the:

(1) Process offgas temperature, which shall be monitored continuously and recorded at least once every shift while the facility is operating in production mode; and

(2) Parameters from which proportion of excess air is determined. Proportion of excess air shall be determined by a combination of total air flow rate, fuel flow rate, spent pickle liquor addition rate, and amount of iron in the spent pickle liquor, or by any other combination of parameters approved by the Administrator in accordance with §63.8(f) of subpart A of this part. Proportion of excess air shall be determined and recorded at least once every shift while the plant is operating in production mode.

(3) Each monitoring device must be certified by the manufacturer to be accurate to within 5 percent and must be calibrated in accordance with the manufacturer's instructions but not less frequently than once per year.

(4) Operation of the plant with the process offgas temperature lower than the value established during performance testing or with the proportion of excess air greater than the value established during performance testing is a violation of the operational standard specified in §63.1159(a) of this subpart.

(c) The owner or operator of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

§ 63.1163 Notification requirements.

(a) *Initial notifications.* As required by §63.9(b) of subpart A of this part, the owner or operator shall submit the following written notifications to the Administrator:

(1) The owner or operator of an area source that subsequently becomes subject to the requirements of the standard shall provide notification to the applicable permitting authority as required by §63.9(b)(1) of subpart A of this part.

(2) As required by §63.9(b)(2) of subpart A of this part, the owner or operator of an affected source that has an initial startup before June 22, 1999, shall notify the Administrator that the source is subject to the requirements of the standard. The notification shall be submitted not later than October 20, 1999 (or within 120 calendar days after the source becomes subject to this standard), and shall contain the information specified in §§63.9(b)(2)(i) through 63.9(b)(2)(v) of subpart A of this part.

(3) As required by §63.9(b)(3) of subpart A of this part, the owner or operator of a new or reconstructed affected source, or a source that has been reconstructed such that it is an affected source, that has an initial startup after the effective date and for which an application for approval of construction or reconstruction is not required under §63.5(d) of subpart A of this part, shall notify the Administrator in writing that the source is subject to the standards no later than 120 days after initial startup. The notification shall contain the information specified in §§63.9(b)(2)(i) through 63.9(b)(2)(v) of subpart A of this part, delivered or postmarked with the notification required in §63.9(b)(5) of subpart A of this part.

(4) As required by §63.9(b)(4) of subpart A of this part, the owner or operator of a new or reconstructed major affected source that has an initial startup after June 22, 1999, and for which an application for approval of construction or reconstruction is required under §63.5(d) of subpart A of this part shall provide the information specified in §§63.9(b)(4)(i) through 63.9(b)(4)(v) of subpart A of this part.

(5) As required by §63.9(b)(5) of subpart A of this part, the owner or operator who, after June 22, 1999, intends to construct a new affected source or reconstruct an affected source subject to this standard, or reconstruct a source such that it becomes an affected source subject to this standard, shall notify the Administrator, in writing, of the intended construction or reconstruction.

(b) *Request for extension of compliance.* As required by §63.9(c) of subpart A of this part, if the owner or operator of an affected source cannot comply with this standard by the applicable compliance date for that source, or if the owner or operator has installed BACT or technology to meet LAER consistent with §63.6(i)(5) of subpart A of this part, he/she may submit to the Administrator (or the State with an approved permit program) a request for an extension of compliance as specified in §§63.6(i)(4) through 63.6(i)(6) of subpart A of this part.

(c) *Notification that source is subject to special compliance requirements.* As required by §63.9(d) of subpart A of this part, an owner or operator of a new source that is subject to special compliance requirements as specified in §§63.6(b)(3) and 63.6(b)(4) of subpart A of this part shall notify the Administrator of his/her compliance obligations not later than the notification dates established in §63.9(b) of subpart A of this part for new sources that are not subject to the special provisions.

(d) *Notification of performance test.* As required by §63.9(e) of subpart A of this part, the owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow the Administrator to review and approve the site-specific test plan required under §63.7(c) of subpart A of this part and, if requested by the Administrator, to have an observer present during the test.

(e) *Notification of compliance status.* The owner or operator of an affected source shall submit a notification of compliance status as required by §63.9(h) of subpart A of this part when the source becomes subject to this standard.

§ 63.1164 Reporting requirements.

(a) *Reporting results of performance tests.* As required by §63.10(d)(2) of subpart A of this part, the owner or operator of an affected source shall report the results of any performance test as part of the notification of compliance status required in §63.1163 of this subpart.

(b) *Progress reports.* The owner or operator of an affected source who is required to submit progress reports under §63.6(i) of subpart A of this part shall submit such reports to the Administrator (or the State with an approved permit program) by the dates specified in the written extension of compliance.

(c) *Periodic startup, shutdown, and malfunction reports.* Section 63.6(e) of subpart A of this part requires the owner or operator of an affected source to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all times, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence.

(1) *Plan.* As required by §63.6(e)(3) of subpart A of this part, the owner or operator shall develop a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standards.

(2) *Reports.* As required by §63.10(d)(5)(i) of subpart A of this part, if actions taken by an owner or operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the owner or operator shall state such information in a semiannual report. The report, to be certified by the owner or operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half; and

(3) *Immediate Reports.* Any time an action taken by an owner or operator during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the owner or operator shall comply with all requirements of §63.10(d)(5)(ii) of subpart A of this part.

[64 FR 33218, June 22, 1999, as amended at 71 FR 20458, Apr. 20, 2006]

§ 63.1165 Recordkeeping requirements.

(a) *General recordkeeping requirements.* As required by §63.10(b)(2) of subpart A of this part, the owner or operator shall maintain records for 5 years from the date of each record of:

(1) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(2) The occurrence and duration of each malfunction of the air pollution control equipment;

(3) All maintenance performed on the air pollution control equipment;

(4) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

(5) All information necessary to demonstrate conformance with the startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see §63.10(b)(2)(v) of subpart A of this part);

(6) All required measurements needed to demonstrate compliance with the standard and to support data that the source is required to report, including, but not limited to, performance test measurements (including initial and any subsequent performance tests) and measurements as may be necessary to determine the conditions of the initial test or subsequent tests;

(7) All results of initial or subsequent performance tests;

(8) If the owner or operator has been granted a waiver from recordkeeping or reporting requirements under §63.10(f) of subpart A of this part, any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements;

(9) If the owner or operator has been granted a waiver from the initial performance test under §63.7(h) of subpart A of this part, a copy of the full request and the Administrator's approval or disapproval;

(10) All documentation supporting initial notifications and notifications of compliance status required by §63.9 of subpart A of this part; and

(11) Records of any applicability determination, including supporting analyses.

(b) *Subpart CCC records.* (1) In addition to the general records required by paragraph (a) of this section, the owner or operator shall maintain records for 5 years from the date of each record of:

(i) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used;

(ii) Calibration and manufacturer certification that monitoring devices are accurate to within 5 percent; and

(iii) Each maintenance inspection and repair, replacement, or other corrective action.

(2) The owner or operator of an acid regeneration plant shall also maintain records for 5 years from the date of each record of process offgas temperature and parameters that determine proportion of excess air.

(3) The owner or operator shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Administrator for the life of the affected source or until the source is no longer subject to the provisions of this subpart. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by the Administrator for a period of 5 years after each revision to the plan.

(c) *Recent records.* General records and subpart CCC records for the most recent 2 years of operation must be maintained on site. Records for the previous 3 years may be maintained off site.

§ 63.1166 Implementation and enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if implementation and enforcement of this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (8) of this section.

(1) Approval of alternatives to the requirements in §§63.1155, 63.1157 through 63.1159, and 63.1160(a).

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of any alternative measurement methods for HCl and CL₂ to those specified in §63.1161(d)(1).

(4) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(5) Approval of any alternative monitoring requirements to those specified in §§63.1162(a)(2) through (5) and 63.1162(b)(1) through (3).

(6) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

(7) Waiver of recordkeeping requirements specified in §63.1165.

(8) Approval of an alternative schedule for conducting performance tests to the requirement specified in §63.1162(a)(1).

[68 FR 37356, June 23, 2003]

§§ 63.1167-63.1174 [Reserved]

Table 1 to Subpart CCC of Part 63—Applicability of General Provisions (40 CFR Part 63, Subpart A) to Subpart CCC

Reference	Applies to Subpart CCC	Explanation
63.1–63.5	Yes.	
63.6 (a)–(g)	Yes.	
63.6 (h)	No	Subpart CCC does not contain an opacity or visible emission standard.
63.6 (i)–(j)	Yes.	
63.7–63.9	Yes.	
63.10 (a)–(c)	Yes.	
63.10 (d) (1)–(2)	Yes.	
63.10 (d)(3)	No	Subpart CCC does not contain an opacity or visible emission standard.
63.10 (d) (4)–(5)	Yes.	
63.10 (e)–(f)	Yes.	
63.11	No	Subpart CCC does not require the use of flares.
63.12–63.15	Yes	

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name: U.S. Steel - East Chicago Tin Products
Source Location: 101 East 129th Street, East Chicago, Indiana 46312
County: Lake
SIC Code: 3313 and 3316
Operation Permit No.: T089-27328-00300
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from U.S. Steel - East Chicago Tin Products relating to the operation of a tin mill.

History

On January 5, 2009, U.S. Steel - East Chicago Tin Products submitted an application to the OAQ requesting to renew its operating permit. U.S. Steel - East Chicago Tin Products was issued a Part 70 Operating Permit Renewal on October 5, 2004.

Source Definition

U.S. Steel - East Chicago Tin Products is considered a separate source from U.S. Steel - Gary Works. U.S. Steel-East Chicago Tin Products is not a support facility for U.S. Steel - Gary Works, because less than fifty (50%) percent of its output is dedicated to U.S. Steel-Gary Works and the two mills are ten (10) miles apart. Therefore, East Chicago Tin Products is considered a completely separate operation from U.S. Steel - Gary Works.

Permitted Emission Units and Pollution Control Equipment

U.S. Steel - East Chicago Tin Products consists of the following permitted emission units and pollution control devices:

(a) Continuous Pickling Line

- (1) One (1) Pickle Line constructed in 1952 consisting of four (4) HCl process tanks and a water rinse tank with acid fumes controlled by one (1) packed tower scrubber with air flow of 22,000 acfm exhausting through stack (S5A).

(b) 6- Stand Cold Reduction Tandem Mill

- (1) One (1) 6 Stand Tandem Mill (emission unit EC-CR) containing six (6) stands (EC-CR0000) constructed in 1956 having a maximum capacity of 120 tons per hour. Oily mist is controlled using mist eliminator (EC-CR CD1) exhausting through two (2) stacks (S7A and S7A1).

(c) Continuous Annealing Line

- (1) One (1) Continuous Annealing Line (emission unit EC-CA) constructed in 1960 having a maximum capacity of 56 tons per hour consisting of the following:
 - (A) Two (2) alkali cleaning tanks (emission unit ECCA0020) with emissions

controlled using a gas/fume washer (Rotoclone Type "N") (EC-CA CD1) exhausting through one (1) stack (S7D).

- (B) One (1) non-contact brush scrubber (emission unit ECCA0021) having emissions exhausting into the building.
- (C) One (1) natural gas fired continuous annealing furnace having a maximum heat input capacity of 70 MMBtu per hour with emissions exhausting through one (1) stack (S7C).

(d) Tin Free Steel Line (Chrome Line)

- (1) One (1) Tin Free Steel Line (Chrome Line) (emission unit EC-CT) constructed in 1964 having a maximum capacity of 33.7 tons per hour consisting of the following:
 - (A) One (1) caustic NaOH cleaner tank (EC-CT0050) using a cleaning solution containing caustic soda at a maximum of 59.0 pounds per hour to clean steel coils. Emissions are controlled using a gas/fume washer (Rotoclone Type "N") exhausting through one (1) stack (S7F).
 - (B) One (1) Pickling process tank (EC-CT0051) using a pickling solution containing sulfuric acid at a maximum of 3.0 pounds per hour to process steel coils. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (C) One (1) Chrome Electroplating process (EC-CT0052) using a plating coating solution containing chromic acid at a maximum of 20.0 pounds per hour, sulfuric acid and silica fluoride at a maximum of 0.6 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (D) One (1) Chemical Treatment Tank (EC-CT0053) using a solution containing chromic acid at a maximum of 3.0 pounds per hour. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).
 - (E) One (1) Chemical Treatment Rinse Tank (EC-CT0054) using water to rinse coils after chemical treatment with chromic acid. Emissions are controlled by one (1) packed bed wet scrubber (EC-CT CD1) and exhausting through one (1) stack (S7E).

(e) Electrolytic Tinning Line (Tin Line)

- (1) One (1) Electrolytic Tinning Line (Tin Line) constructed in 1956 having a maximum capacity of 48.5 tons per hour consisting of the following:
 - (A) Cleaning and Pickle Section:
 - (i) One (1) caustic NaOH cleaning tank (EC-TL0060) using a solution containing caustic soda at a maximum of 5.0 pounds per hour. Emissions are controlled using one (1) packed bed wet scrubber (EC-TL CD 1).
 - (ii) One (1) pickle tank (EC-TL 0061) using a solution containing sulfuric acid at a maximum of 6.0 pounds per hour. Emissions

are controlled using one (1) packed bed wet Scrubber (EC-TL CD2).

- (iii) Both scrubbers in the Cleaning and Pickling Section exhaust through a common stack (S7G).

(B) Tin Plating Section (Halogen Process):

- (i) One (1) set of tin plating cells 1-7 (SC-TL0063) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD3).
- (ii) One (1) set of tin plating cells 8-18 (SC-TL0062) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD4).
- (iii) One (1) set of tin plating cells 19-32 (SC-TL0064) with emissions controlled using one (1) packed bed wet scrubber (EC-TL CD5).
- (iv) The three (3) sets of plating cells (1-7, 8-18 and 19-32) combined use solutions containing sodium bifluoride at a maximum rate of 110.0 pounds per hour, sodium ferro cyanide at a maximum of 5.0 pounds per hour, polyethylene glycol at a maximum of 0.1 pounds per hour and hydrochloric acid at a maximum of 69.0 pounds per hour.
- (v) All three (3) scrubbers in the Tin Plating Section exhaust through a common stack (S7H).

(C) One (1) Chemical Treatment Section:

- (i) Coils exiting the Tin Plating Section may be treated with a solution containing sodium bichromate/dichromate at a maximum of 37.0 pounds per hour. Emissions from the one (1) chemical treatment tank are controlled by a packed bed scrubber (EC-TL CD6), exhausting through one (1) Stack (S7I).

(f) Batch Annealing Operation

- (1) One (1) Batch Annealing Operation (emission unit EC-BA) constructed in 1956 with a capacity of 48.5 tons per hour consisting of five (5) natural gas fired furnaces having a maximum heat input capacity of 16 MMBtu per hour each and nine (9) bases (ECBA0030 through ECBA0038). Emissions exhaust into the building and through the roof vent (V7A).

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Specifically regulated insignificant activities
 - (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3]
 - (2) Cleaners and solvents characterized as:
 - (A) Having a vapor pressure equal to or less than two (2.0) kilo Pascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pound per square

inch) measured at thirty-eight (38) degrees Centigrade (one hundred (100) degrees Fahrenheit); or

- (B) Having a vapor pressure equal to or less than seven-tenths (0.7) kilo Pascal (five (5) millimeters of mercury or one-tenth (0.1) pound per square inch) measured at twenty (20) degrees Centigrade (sixty-eight (68) degrees Fahrenheit); the use of which, for all cleaners and solvents combined, does not exceed one hundred forty-five (145) gallons per twelve (12) months. [326 IAC 8-3]
- (3) The following equipment related to manufacturing activities not resulting in the emission of HAPs: Brazing, Cutting torches, Soldering, and Welding. [326 IAC 6-3-2]
 - (4) 2- Stand Tin Temper Mill
One (1) Temper mill (emission unit EC-TM) containing two (2) stands (EC-TM 0042), constructed in 1956 having a maximum capacity of 48.5 tons per hour. Emissions are controlled by a baghouse (EC-TM CD1) exhausting inside the building. The baghouse was installed to improve the quality of the coils processed through the Temper Mill. [326 IAC 6-3-2]
 - (5) One (1) Electrolytic Cleaning line, (emission Unit EC-EC), constructed in 1956, having a maximum capacity of 48.5 tons per hour. The line consists of caustic cleaning tanks (EC-EC0010) and a brush scrubber (EC-EC0011). Emissions are controlled using a gas/fume washer (Rotoclone Type "N") (EC-EC CD1) exhausting through one (1) stack (S7B). [326 IAC 6-3-2]
 - (6) RCCP Recoil and Inspection Line [326 IAC 6-3-2]
One (1) Recoil and Inspection Line RCCP (emission unit EC-RI) constructed in 1956, consisting of the following:
 - (A) One (1) Recoiler Unit (EC-RC) where coils are unwound for surface quality and edge alignment inspections and then recoiled for further processing or shipment to customers.
 - (B) One (1) Electrostatic Oiler, (emission unit EC-RI0040) with emissions exhausting to one (1) Stack (S7J).
- (b) Other insignificant activities
- (1) Space heaters, process heaters, heat treat furnaces, or boilers using the following fuels:
 - (A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour.
 - (B) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) British thermal units per hour and firing fuel containing equal to or less than five-tenths percent (0.5%) sulfur by weight.
 - (2) Combustion source flame safety purging on startup.
 - (3) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

- (4) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.
- (5) The following VOC and HAP storage containers:
 - (A) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
 - (B) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (6) Refractory storage not requiring air pollution control equipment.
- (7) Equipment used exclusively for the following:
 - (A) Packaging lubricants and greases.
 - (B) Filling drums, pails, or other packaging containers with lubricating oils, Waxes and greases.
- (8) Production related activities, including the following:
 - (A) Application of oils; greases; lubricants; and nonvolatile material; as temporary protective coatings.
 - (B) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (9) Closed loop heating and cooling systems.
- (10) Using eighty (80) tons or less of welding consumables.
- (11) Rolling oil recovery systems.
- (12) Solvent recycling systems with batch capacity less than or equal to one hundred (100) gallons.
- (13) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (14) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs.
- (15) Heat exchanger cleaning and repair.
- (16) Asbestos abatement projects regulated by 326 IAC 14-10.
- (17) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following:
 - (A) Purging of gas lines.
 - (B) Purging of vessels.

- (18) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:
 - (A) Catch tanks.
 - (B) Temporary liquid separators.
 - (C) Tanks.
 - (D) Fluid handling equipment.
- (19) Blowdown for the following:
 - (A) Sight glass.
 - (B) Boiler.
 - (C) Cooling tower.
 - (D) Compressors.
 - (E) Pumps.
- (20) Activities associated with emergencies, including the following:
 - (A) On-site fire training approved by the department.
 - (B) Emergency generators as follows:
 - (i) Gasoline generators not exceeding one hundred ten (110) horsepower.
 - (ii) Diesel generators not exceeding one thousand six hundred (1,600) horsepower.
- (21) Filter or coalescer media change out.
- (22) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (23) Other activities with emission below significant thresholds regulated in 326 IAC 8-9-1:
 - (A) No.1 Gasoline Storage Tank, with a capacity of 560 gallons.
 - (B) No. 2 Diesel fuel storage tank, with a capacity of 200 gallons.

Existing Approvals

Since the issuance of the Part 70 Operating Permit T089-15344-00300 on October 5, 2004, there have been no previous approvals issued to this source.

Enforcement Issue

There are no enforcement actions pending.

County Attainment Status

The source is located in Lake County

Pollutant	Designation
SO ₂	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 th 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 ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	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 ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ 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 PM2.5.	

(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 (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

(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 NOx 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 NOx 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 NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

- (b) PM2.5
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM2.5. 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 PM2.5 promulgated on May 8th, 2008, and effective on July 15th 2008. Therefore, direct PM2.5 and SO2 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 for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
 Since this type of operation is in one of the 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	less than 100
PM ₁₀	less than 100
PM _{2.5}	less than 100
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

HAPs	tons/year
HCl	greater than 10
Total	greater than 25

The Permittee has agreed that they are major for Part 70 Permits 326 IAC 2-7 and Hazardous Air Pollutants 326 IAC 20. Calculations can be found in Appendix A.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are counted toward the determination of Part 70 applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 permit renewal, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Limited Potential to Emit						
	PM*	PM-10/ PM2.5	SO ₂	VOC	CO	NO _x	HAPs
Continuous Pickling Line	negligible	negligible	--	--	--	--	>10 single >25 combined
6-Stand Cold Reduction Tandem Mill	7.36	7.36	--	24.7	--	--	--
Continuous Annealing Line	2.27	2.27	--	6.45	--	--	--
Continuous Annealing Line combustion	0.58	2.33	0.184	1.69	25.75	30.66	^a P ₁ ^{aa} 1/2 [©]
Tin Free Steel Line (Chrome Line)	6.48	6.48	--	--	--	--	¥¥
Electrolytic Tinning Line (Tin Line)	1.66	1.66	--	1.72	--	--	--
Batch Annealing Operation	2.59	2.59	--	--	--	--	--
Batch Annealing Operation combustion	0.67	2.66	0.21	1.93	29.43	35.04	0.003
Electrolytic Cleaning Line	negligible	negligible	--	--	--	--	--
Totals	14.57	18.31	0.394	28.6	55.18	65.7	>10 single >25 combined

*All PM limited PTE is based on 326 IAC 6-3-2 allowables.

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than one hundred (<100) tons per year, and it is one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
Since this type of operation is in 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.

Federal Rule Applicability

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to existing emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the existing units as part of this Part 70 permit renewal.

For NSPS/NESHAPs

- (a) The requirements of the New Source Performance Standard for 40 CFR Part 60, Subpart Kb (Volatile Organic Storage Vessels) are not included in the permit for the No. 1 Gasoline Storage Tank and No. 2 Diesel Fuel Tank because the tanks are less than 75 m³ in capacity.
- (b) The Chrome Electroplating is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR Part 63, Subpart N per a letter dated April 11, 1996 from George Czerniack, US EPA Region 5 to Charles Carson at US Steel-Gary Works and Felicia George, Asst. Commissioner, IDEM-OAQ.

The US EPA intended to regulate all sources that perform chromium electroplating. The US Steel East Chicago facility's chrome process lines do chrome electroplating. Control is available and feasible. The continuous chrome electroplating of steel is uniquely different from the hard and decorative chrome plating categories specified in Subpart N. However, the NESHAP may be amended in the future to include the continuous chromium electroplating of steel.
- (c) Pickling process tank (EC-CT0051) and pickle tank (EC-TL 0061) are not subject to National Emission Standards for Hazardous Air Pollutants, 40 CFR 63 Subpart CCC because sulfuric acid and not hydrochloric acid are used in them. THE NESHAP only includes pickling processes using hydrochloric acid.
- (c) The cold cleaner degreasing is not subject to National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart T because it does not cold solvent clean using any of the following solvents : methyl chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform or any combination of these halogenated hazardous air pollutants.

The following federal rules are applicable to the source:

- (a) This source is subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.1155-63.1166 (Subpart CCC), and 326 IAC 20-1-1 because the source is a major source of HAPs and the Continuous Pickle Line at this source are subject, as defined in 40 CFR 63.1157. Therefore, the requirements of National Emission Standards for Hazardous Air Pollutants for Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants, (40 CFR 40 CFR 63.1155-63.1166 (Subpart CCC) are included in the permit.

Under NESHAP, Subpart CCC, Steel Pickling-HCl Process Facilities and Hydrochloric Acid Regeneration Plants identified as the Pickle Line is considered an existing affected source because the construction of each operation commenced prior to June 22, 2001.

Non applicable portions of the NESHAP will not be included in the permit. This source is subject to the following portions of Subpart CCC:

- (1) 40 CFR 63.1155
- (2) 40 CFR 63.1156
- (3) 40 CFR 63.1157(a)
- (4) 40 CFR 63.1159(b)
- (5) 40 CFR 63.1160
- (6) 40 CFR 63.1161(a), (b) and (d)
- (7) 40 CFR 63.1162(a) and (c)
- (8) 40 CFR 63.1163
- (9) 40 CFR 63.1164
- (10) 40 CFR 63.1165
- (11) Table 1 to Subpart CCC of Part 63

The provisions of 40 CFR 63 Subpart A – General Provisions apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart CCC.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)
The source is subject to 326 IAC 1-6-3.

326 IAC 2-2 and 326 IAC 2-3 (Prevention of Significant Deterioration and Emission Offset)
The source is a minor source under 326 IAC 2-2 and 326 IAC 2-3, because no regulated pollutant has the potential to emit greater than the thresholds in 326 IAC 2-2-1(jj) or 326 IAC 2-3-1(ee).

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)
The operation of U.S. Steel-East Chicago Tin Products Plant will emit greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 would apply to the facility, however, pursuant to 326 IAC 2-4.1-1(b)(2), because this facility is specifically regulated by NESHAP 40 CFR 63, Subpart CCC which were issued pursuant to Section 112(d) of the CAA, this facility is exempt from the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program. Pursuant to this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), the Permittee shall submit by July 1 an emission statement covering the previous calendar year starting in 2004 and every three (3) years thereafter, and any year not already required under (1) if the source emits volatile organic compounds or oxides of nitrogen into the ambient air at levels equal to or greater than twenty-five (25) tons during the previous calendar year.

326 IAC 5-1 (Opacity Limitations)

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

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

State Rule Applicability – Individual Facilities

326 IAC 6.8-2-1 (Lake County PM-10 Emission Requirements)

This source is not subject to the 326 IAC 6.8-2-1 Lake County PM-10 Emission Requirements, because none of the equipment at the source is specifically listed in 326 IAC 6.8-2-1 and the particulate emissions potential to emit is less 100 tons per year.

326 IAC 6.8-10-1 (Lake County Fugitive Particulate Matter)

This source is not subject to the provisions in 326 IAC 6.8-10-1 (Lake County Fugitive Particulate Matter), because the potential to emit fugitive dust is less than five (5) tons of fugitive dust into the atmosphere in Lake County.

326 IAC 6-4 (Fugitive Dust Emissions)

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 6-5 (Fugitive Particulate Matter Emissions Limitations)

This source is not subject to 326 IAC 6-5 (Fugitive Particulate Matter Emissions Limitations), because the potential to emit fugitive particulate matter is less than 25 tons per year and was constructed before December 13, 1985.

326 IAC 7-1-1.1 (Sulfur Dioxide Emission Limitations)

The source is not subject to 326 IAC 7-1-1.1 (Sulfur Dioxide Emission Limitations), because facilities located at the source have the potential to emit sulfur dioxide less than twenty-five (25) tons per year or ten (10) pounds per hour.

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

- (a) Pursuant to 326 IAC 6-3-2(e), the manufacturing processes listed in the table below shall be limited by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

and

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

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

Process Description	Process Weight Rate (ton/hr of metal)	326 IAC 6-3-2 Allowable (lb/hr)
Continuous Pickling Line	160	56.12
6 Stand Cold Reduction Tandem Mill	120	53.13
Continuous Annealing Line	56	45.64
Tin Free Steel Line (Chrome Line)	33.7	40.98
Electrolytic Tinning Line (Tin Line)	48.5	44.29
Batch Annealing Operation	48.5	44.29

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions rate from the 2-Stand Temper Mill, the Electrolytic Cleaning line, the RCCP Recoil and Inspection Line and the Brazing, Cutting torches, Soldering, and Welding shall not exceed the pounds per hour emission rate established as “E” in the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and } P = \text{process weight rate in tons per hour}$$

326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control) Insignificant Activities (degreasing)

(a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-8 (Organic Solvent Degreasing Operations: material requirements for cold cleaning degreasers)

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), the users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Clark, Floyd, Lake, and Porter Counties, except for solvents intended to be used to clean electronic components shall do the following:

- (a) On and after November 1, 1999, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) On and after May 1, 2001, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) All records required by 326 IAC 8-3-8 (d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The Compliance Monitoring Requirements applicable to this source are as follows:

1. Continuous Pickling Line

The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. 40 CFR Part 63, Subpart CCC establishes the compliance monitoring requirements for the Pickle Line.

2. 6-Stand Cold Reduction Tandem Mill

There is no compliance monitoring required for the 6-Stand Cold Reduction Tandem Mill. The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. The mist eliminator shall be in operation at all times the 6-Stand Tandem Mill is in operation to control oily mist.

3. Continuous Annealing Line

There is no compliance monitoring required for the Continuous Annealing Line. The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. The fume washer on the alkaline electrolytic cleaning section is for OSHA requirements, and is not required to comply with applicable PM limitations. The Continuous Annealing Line is fired by natural gas. No VE notations are required because natural gas is the only fuel utilized for the Continuous Anneal Line.

4. Tin Free Steel Line (Chrome Line)

There is no compliance monitoring required for the Tin Free Steel Line (Chrome Line). The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. The gas/fume washer and wet scrubber are for OSHA requirements, and are not required to comply with applicable PM limitations.

5. Electrolytic Tinning Line (Tin Line)

There is no compliance monitoring required for the Electrolytic Tinning Line (Tin Line). The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. The scrubbers are for OSHA requirements, and are not required to comply with applicable PM limitations.

6. Batch Annealing Operation

There is no compliance monitoring required for the Batch Annealing Operation. The process line is not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2. The Batch Annealing Line is fired by natural gas. No VE notations are required because natural gas is the only fuel utilized for the Continuous Anneal Line.

7. Insignificant Activities

There is no compliance monitoring required for the insignificant activities. Compliance for the Degreasing Operation will be verified by record keeping requirements. The process lines are not expected to exceed the allowable particulate emissions rate, pursuant to 326 IAC 6-3-2.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on January 5, 2009.

Conclusion

The operation of this tin mill shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. T089-27328-00300.

Summary

Company Name: US Steel –East Chicago Tin Products
Address City IN Zip: 101 East 129th Street, East Chicago, Indiana 46312
Permit Number: T089-27328-00300
Reviewer: Teresa Freeman 7/14/2009
Date:

Uncontrolled Emissions

Equipment	PM	PM10	SO2	NOx	VOC	CO	HAPs
Continuous Pickling Line	negligible	negligible	-	-	-	-	>25
6-Stand Cold Reduction Mill	73.58	73.58	-	-	24.7	-	-
Continuous Annealing Line	2.27	2.27	-	-	6.45	-	-
Continuous Annealing Line Combustion	0.58	2.33	0.184	30.66	1.69	25.75	0.0027
Tin Free Steel Line (Chrome Line)	6.48	6.48	-	-	-	-	-
Electrolytic Tinning Line (Tin Line)	1.66	1.66	-	-	1.72	-	-
Batch Annealing Operation	2.59	2.59	-	-	-	-	-
Batch Annealing Operation Combustion	0.67	2.66	0.21	35.04	1.93	29.43	0.003
2-Stand Temper Mill	10.2	10.2	-	-	-	-	-
Electrolytic Cleaning Line	negligible	negligible	-	-	-	-	-
Total	98.03	101.77	0.394	65.7	36.49	55.18	>25

Controlled Emissions

Equipment	PM	PM10	SO2	NOx	VOC	CO	HAPs
Continuous Pickling Line	negligible	negligible	-	-	-	-	>25
6-Stand Cold Reduction Mill	7.36	7.36	-	-	24.7	-	-
Continuous Annealing Line	2.27	2.27	-	-	0.255	-	-
Continuous Annealing Line Combustion	0.58	2.33	0.184	30.66	1.69	25.75	0.0027
Tin Free Steel Line (Chrome Line)	0.06	0.06	-	-	-	-	-
Electrolytic Tinning Line (Tin Line)	0.02	0.02	-	-	0.066	-	-
Batch Annealing Operation	2.59	2.59	-	-	-	-	-
Batch Annealing Operation Combustion	0.67	2.66	0.21	35.04	1.93	29.43	0.003
2-Stand Temper Mill	1.02	1.02	-	-	-	-	-
Electrolytic Cleaning Line	negligible	negligible	-	-	-	-	-
Total	14.57	18.31	0.394	65.7	28.641	55.18	>25

**Appendix A: Emissions Calculations
PTE for Tin and Chrome lines
HAPs Emissions before Controls**

Company Name: US Steel –East Chicago Tin Products
Address City IN Zip: 101 East 129th Street, East Chicago, Indiana 46312
Permit Number: T089-27328-00300
Reviewer: Teresa Freeman
Date: 7/14/2009

Process and HAP Solution Makeup	Ib/hr Makeup Solution used	Ib/yr=Ib/hr X 8760 hrs/year Makeup Solution used	3% of makeup solution released Ib/yr X 0.03	wt%/wt of solution makeup HAPs (Solution released X wt% HAPS)	PTE Uncontrolled HAPs Released lbs/yr	PTE Uncontrolled HAPs Released Tons/yr	Controlled HAP emissions
Electrolytic Tinning Line (Tin Line)							
Sodium ferrocyanide Na ₂ Fe(CN) ₆ · 10H ₂ O ^(a)	4.17	36524	1095.7	58.90%	645.38	0.323	0.013
Sulfuric Acid H ₂ SO ₄ ^(b)	7.17	62775	1883.3	31.50%	593.23	0.297	0.012
Sodium bichromate/dichromate	7.82	68482	2054.5	100.00%	2054.46	1.027	0.041
Tin Free Steel Line (Chrome Line)							
Chromic Acid CrO ₃ ^(d)	49.09	430004	12900.1	100.00%	12900.12	6.450	0.255
Total Uncontrolled HAPS						8.1	0.321

(a) Makeup solution used based on 12800 lb/3070 hrs in 2001= 4.17 lb/hr X 8760=36524 lb/yr

(b) Makeup solution used based on 22000 lb/3070 hrs in 2001= 7.17 lb/hr X 8760=62775 lb/yr

(c) Makeup solution used based on 24000 lb/3070 hrs in 2001= 7.82 lb/hr X 8760=68482 lb/yr

(d) Makeup solution used based on 12800lb/3070 hrs in 2001= 4.17 lb/hr X 8760=36524 lb/yr

Control and capture efficiency= 0.98*0.98=0.9604 (1.00-0.9604)=0.0396

**Appendix A: Emissions Calculations
Potential To Emit
Particulate Emissions before Controls**

Company Name: US Steel –East Chicago Tin Products
Address City IN Zip: 101 East 129th Street, East Chicago, Indiana 46312
Permit Number: T089-27328-00300
Reviewer: Teresa Freeman
Date: 7/14/2009

Process	Throughput Tons/hr	Uncontrolled Emission Factor (lb/Ton of steel)	Uncontrolled Potential Emissions (lbs/hr)	Uncontrolled Potential Emissions (Tons/yr)	Control Efficiency	Controlled Potential Emissions (tons/yr)
Continuous Pickling Line	160	negligible	negligible	negligible	negligible	negligible
6-Stand Cold Reduction Mill	120	0.14	16.80	73.58	0.90	7.36
Continuous Annealing Line	56.00	0.00926	0.52	2.27	-	2.27
Tin Free Steel Line (Chrome Line)	33.70	0.04390	1.48	6.48	0.99	0.06
Electrolytic Tinning Line (Tin Line)	48.50	0.0078	0.38	1.66	0.99	0.02
Batch Annealing Operation	48.50	0.0122	0.59	2.59	-	2.59
2-Stand Temper Mill	48.50	0.0480	2.33	10.20	0.90	1.02
Electrolytic Cleaning Line	48.50	negligible	negligible	negligible	negligible	negligible
Total Uncontrolled HAPS				96.78		13.32

¹ This calculation takes into account the oily mist 0.75 lb/oil per ton x 25% emitted into the air = 0.188 lb oil/ton of steel total emissions 0.188 lb/hr – VOC emission factor 0.047 lb/ton = 0.14 lb oil per ton.

² This calculation accounts for the dust collected by the Temper Mill baghouse, namely 0.048 lb of PM/ ton of steel based on lbs of dust collected per tons of steel throughput.

³ The basis is 1026 Btu/SCF of natural gas burned.

⁴ All HAPs solid (salts) and liquids (mists) are considered particulate emissions.

Electrolytic Tinning Line 1.65 tons/yr x 2000 lb/ton = 3300 lb/yr // 1yr/8760 hr = 0.38 lb/hr

Tin Free Steel Line 6.45 tons/yr x 2000 lb/ton = 12,900 lb/yr / 1yr/8760 hr =1.47 lb/hr

⁵ Uncontrolled Emissions in lbs/hr are calculated by the following formula:

Throughput tons/hr x emission factor lb/ton = Uncontrolled Emissions lbs/hr

⁶ Uncontrolled Potential Emissions are calculated by the following formula:

Uncontrolled Emissions lb/hr x 8760hrs/1yr x 1 ton/2000 lb = Uncontrolled Emissions Tons/yr

Appendix A: Emissions Calculations
Potential To Emit
Particulate Emissions before Controls

Company Name: US Steel –East Chicago Tin Products
Address City IN Zip: 101 East 129th Street, East Chicago, Indiana 46312
Permit Number: T089-27328-00300
Reviewer: Teresa Freeman
Date: 7/14/2009

Process	Throughput Tons/hr	Uncontrolled Emission Factor (lb/Ton of steel	Uncontrolled Potential Emissions (lbs/hr)	Uncontrolled Potential Emissions (Tons/yr)
6-Stand Cold Reduction Mill	120	0.047 lb/ton	5.64	24.70
Total Uncontrolled HAPS				24.70

0.047 lbs VOC/ton steel * 120 ton/hr = 5.64 lb VOC/hr
5.64 lb VOC/hr * 8760 hr/yr * 1 ton/2000 lb VOC=24.70 tons VOC per year

This calculation takes into account the oily mist 0.75 lb/oil per ton X 25% emitted into the air= 0.188 lb oil/ ton. Total emissions 0.188 lb/hr--- VOC emission factor 0.047 lb/ton = 0.14 lb oil per ton.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
No. 2 Galvanizing Line (MM BTU/HR <100)**

Company Name: US Steel –East Chicago Tin Products
Address City IN Zip: 101 East 129th Street, East Chicago, Indiana 46312
Permit Number: T089-27328-00300
Reviewer: Teresa Freeman
Date: 7/14/2009

Description	Number of Emission Units	Stack ID	Heat Input Capacity Per Unit (MMBtu/hr)	Total Maximum Potential Throughput (MMCF/yr)
Continuous Annealing Furnace	1	S7C	70.000	613.2
Batch Annealing Funace	5	V7A	16.000	700.8
Totals	6		150.000	1314.0

Emission Factor (lbs/MMCF)						
PM*	PM10*	SO ₂	NO _x **	CO	VOC	HAPs
1.9	7.6	0.6	100	84.0	5.5	0.09

Potential To Emit (tons/yr)							
Stack ID	PM	PM10	SO ₂	NO _x	CO	VOC	HAPs
S7C	0.58	2.33	0.184	30.66	25.75	1.69	2.7E-02
V7A	0.67	2.66	0.210	35.04	29.43	1.93	3.0E-02
TOTALS	1.25	4.99	0.39	65.70	55.19	3.61	5.7E-02

* PM and PM10 emission factor are for condensable and filterable PM and PM10 combined.

**Emission factor for NOx: Uncontrolled = 100 lb/MMCF

Emission factors are from AP-42, Chapter 1.4 - Natural Gas Combustion, Tables 1.4-1, 1.4-2, 1.4-3 and 1.4-4. SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. (AP-42 Supplement D 7/98)

1 MMBtu = 1,000,000 Btu

1 MMCF = 1,000,000 cubic feet of gas

All Emission factors are based on normal firing.

METHODOLOGY

Max. Potential Throughput (MMCF/yr) = Number of Units x Heat Input Capacity/Unit (MMBtu/hr) x 8,760 (hrs/yr) x 1 MMCF/1,000 MMBtu

PTE (tons/yr) = Max. Potential Throughput (MMCF/yr) x Emission Factor (lbs/MMCF) x 1/2,000 (ton/lbs)

Total HAP emissions are negligible.



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Mr. James Alexander
US Steel – East Chicago Tin Products
One North Broadway
Gary, Indiana 46402

DATE: October 22, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Title V
089-27328-00300

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:
William R. Donovan (Div Mgr. US Steel)
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.

Final Applicant Cover letter.dot 11/30/07



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

October 22, 2009

TO: East Chicago Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: US Steel - East Chicago Tin Products
Permit Number: 089-27328-00300

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 10/22/2009 US Steel - East Chicago Tin Products 089-27328-00300 (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: CERTIFICATE OF MAILING ONLY	

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		James Alexander US Steel - East Chicago Tin Products One N Broadway Gary IN 46402 (Source CAATS) VIA CONFIRMED DELIVERY										
2		William R Donovan Division Mgr US Steel - East Chicago Tin Products 101 E 129th St East Chicago IN 46312 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		East Chicago Public Library 2401 E Columbus Dr East Chicago IN 46312-2998 (Library)										
5		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
6		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
7		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
8		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
9		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
10		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
11		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
12		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
13		Ms. Kathy Luther Northern Regional Planning Commission 6100 Southport Rd Portage IN 46368 (Affected Party)										
14		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
15		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										

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 Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

Mail Code 61-53

IDEM Staff	CDENNY 10/22/2009 US Steel - East Chicago Tin Products 089-27328-00300 (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	

CERTIFICATE OF MAILING ONLY

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		Anthony 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
2		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)									
3		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
4		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
5		Calumet Township Trustee 35 E 5th Avenue Gary IN 46402 (Affected Party)									
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)									
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