



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

TO: Interested Parties / Applicant

DATE: September 12, 2012

RE: Tube City IMS / 089-32088-00564

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, 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.



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100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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Toll Free (800) 451-6027
www.idem.IN.gov

Michael Connolly
Tube City IMS, LLC
1155 Business Center Drive
Horsham, PA 19044-3454

September 12, 2012

Re: Administrative Part 70 Permit
No.: T089-32088-00564

Dear Mr. Connolly,

Tube City IMS – Contractor of US Steel – Gary Works submitted an air permit application on June 26, 2012 for a stationary iron ore pellet screening plant to be located at One North Broadway, Gary, Indiana 46402. In lieu of a Significant Permit Modification, an Administrative Part 70 Operating Permit is being issued for the following:

- (a) One (1) iron ore pellet screening plant, identified as North Plant unit 01, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (b) One (1) iron ore pellet screening plant, identified as South Plant unit 02, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (c) Loaders for loading/unloading and transporting iron ore pellets on unpaved roads.
- (d) Storage piles.

All other conditions of the permit shall remain unchanged and in effect. Please find enclosed the Administrative Part 70 Permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for Madhurima Moulik or extension (3-0868), or dial (317) 233-0868.

Sincerely,

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MDM

cc: File - Lake County
Lake County Health Department
Air Compliance and Enforcement



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ADMINISTRATIVE PART 70 PERMIT OFFICE OF AIR QUALITY

Tube City IMS, a Contractor of US Steel - Gary Works One North Broadway, Gary, Indiana 46402

(herein known as the Permittee) is hereby authorized to construct and 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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-7-10.5, applicable to those conditions

Administrative Part 70 Permit No.: T089-32088-00564	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 12, 2012 Expiration Date: September 12, 2017

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Affidavit of Construction

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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 iron ore screening plant.

Source Address:	One North Broadway, Gary, Indiana 46402
General Source Phone Number:	219-881-5731
SIC Code:	7389
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD and nonattainment NSR Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) US Steel-Gary Works, 089-00121, the primary operation, is located at One North Broadway, Gary, IN 46402; and
- (b) Tube City IMS, 089-00564, the on-site contractor, is located at One North Broadway, Gary, IN 46402.

Separate Part 70 permits are issued to US Steel - Gary Works, 089-00121, and Tube City IMS, 089-00564, solely for administrative purposes.

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

Tube City IMS consists of the following emission units and pollution control devices:

- (a) One (1) iron ore pellet screening plant, identified as North Plant unit 01, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (b) One (1) iron ore pellet screening plant, identified as South Plant unit 02, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (c) Loaders for loading/unloading and transporting iron ore pellets on unpaved roads.
- (d) Stockpiles at North and South Plant.

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

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.[326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-8]
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-8]
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. [326 IAC 8-9-1]
- (d) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]
- (e) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. [326 IAC 8-9-1]

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

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

- (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 Revocation of Permits [326 IAC 2-1.1-9(5)]

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

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 when prior to the start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.
- (c) The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.

B.4 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, T089-32088-00564, 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.5 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.6 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.7 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.8 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.9 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. 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.10 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent 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.11 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

Indianapolis, Indiana 46204-2251

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 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 prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.13 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, or 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 Office of Air Quality, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.

B.14 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.15 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 T089-32054-00564 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 combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.16 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.17 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.18 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.19 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 does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.20 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 or notice 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.21 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)(1), (c)(1), and (e)(2). 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.22 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.23 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.24 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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.25 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.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.5 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) Material processing facilities shall include the following:
 - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (2) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (3) The PM₁₀ stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
 - (5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
 - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
 - (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan.

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

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

- (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 that meets the requirements of 326 IAC 2-7-6(1) by a "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) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.11 Continuous Compliance Plan [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

- (a) Pursuant to 326 IAC 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.
- (b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.
- (c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

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

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

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

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

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

no later than 180 days from the date on which this source commences operation.

The ERP does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

C.14 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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

(a) The Permittee shall take reasonable response steps to 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 excess emissions.

(b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:

(1) initial inspection and evaluation;

(2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps taken.

C.16 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "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.17 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]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of 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 a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
[326 IAC 2-2][326 IAC 2-3]

- (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. Support information includes the following:
- (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the.
- Records of required monitoring information include the following:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.
- (c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

- (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
- (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

- (g) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 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 applicable standards for recycling and emissions reduction.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) iron ore pellet screening plant, identified as North Plant unit 01, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (b) One (1) iron ore pellet screening plant, identified as South Plant unit 02, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (c) Loaders for loading/unloading and transporting iron ore pellets on unpaved roads.
- (d) Stockpiles at North and South Plants.

(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 PM, PM10 and PM2.5 PSD Minor Limitation [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 not applicable, the following is applicable:

- (a) The material throughput at each of the screens at North Plant and south Plant shall not exceed 8,180,000 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The emissions of PM, PM-10, and PM2.5 shall not exceed the following:

Process	PM (lb/ton)	PM-10 (lb/ton)	PM2.5 (lb/ton)
Screening	0.0022	0.00074	0.00005
Material Transfer	0.00071	0.00024	0.000066

- (c) The material moisture content shall be maintained at 1.5% or above.

Compliance with these limits shall ensure the total PM, PM10 and PM2.5 emissions from the two (2) iron ore pellet screening plants, identified as North Plant 01 and South Plant 02, including the PM, PM10 and PM2.5 emissions from the stockpiles and paved and unpaved roads, are limited to a total of less than 24.95 tons per twelve consecutive month period, to a total of less than 14.9 tons per twelve consecutive month period, and to a total of less than 9.9 tons per twelve consecutive month period, respectively, with compliance determined at the end of each month rendering the requirements of 326 IAC 2-2 not applicable to this modification.

D.1.2 Particulate Matter Limitations for Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), each feeder, screen, conveyor and loader used for iron ore pellet screening at the North and South Plants shall each not exceed 0.03 grains per dry standard cubic foot (gr/dscf) of particulate matter.

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

The Preventative Maintenance Plan is required for the screening and conveying equipment. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.4 PM, PM10 and PM2.5

Compliance with the emission limits in Condition D.1.1(c) shall be determined as follows:

- (a) The Permittee shall perform moisture content analysis or use the results of the chemical analysis performed by US Steel-Gary Works on one sample of the screened pelletized iron ore taken every month.

D.1.5 Fugitive Dust Control

In order to comply with Condition D.1. 2 (Particulate Matter Limitations for Lake County), the Fugitive Dust Control Plan (included as Appendix A to this permit), shall be implemented to control fugitive dust.

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

D.1.6 Visible Emissions Notations

- (a) Visible emission notations of the screening, conveying, loading/unloading and transporting exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, at least eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

D.1.7 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain monthly records of the iron ore pellet throughput and moisture content analysis.
- (b) To document the compliance status with Condition D.1.6 (Visible Emissions Notation), the Permittee shall maintain records of once per day visible emission notations of the screening, conveying, loading/unloading and transporting exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.1.8 Reporting Requirements

A quarterly report to document the compliance status with D.1.1 shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official," as defined by 326 IAC 2-7-1 (34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The insignificant activities specifically regulated are as follows:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F); or
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations, performing organic solvent degreasing, 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.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5] (Cold Cleaner Degreaser Operation and Control)

- (a) Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), for a cold cleaner organic solvent degreaser facility, performing solvent degreasing, construction of which commenced after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control), for a cold cleaning facility, performing organic solvent degreasing, construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:

- (1) Close the cover whenever articles are not being handled in the degreaser.
- (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers)

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), except for solvents intended to be used to clean electronic components the following conditions apply:

- (a) The source shall not operate a cold cleaning degreaser, performing organic solvent degreasing, with a 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).
- (b) The source 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.2.4 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-6 (a) and (b), the Permittee shall maintain the following records for the life of the stationary storage vessels for each vessel:

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Tube City IMS, a Contractor of US Steel - Gary Works
Source Address: One North Broadway, Gary, Indiana 46402
Part 70 Permit No.: T089-32088-00564

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: Tube City IMS, a Contractor of US Steel - Gary Works
Source Address: One North Broadway, Gary, Indiana 46402
Part 70 Permit No.: T089-32088-00564

This form consists of 2 pages

Page 1 of 2

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

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
Part 70 Quarterly Report**

Source Name: Tube City IMS, a contractor of US Steel-Gary Works
Source Address: One North Broadway, Gary, IN 46402
Part 70 Administrative Permit No.: T089-32088-00564
Facility: North and South Plant - Total material throughput
Limit: 8,180,000 tons per twelve (12) consecutive month period, with
compliance determined at the end of each month.

Month: _____ Year: _____

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

**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: Tube City IMS, a Contractor of US Steel - Gary Works
 Source Address: One North Broadway, Gary, Indiana 46402
 Part 70 Permit No.: T089-32088-00564

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Appendix A

Fugitive Dust Control Plan Tube City IMS -USS Steel Iron Ore Pellet Screening Gary, Indiana

Although there are generally few significant fugitive emissions from the screening of iron ore pellets, there is some potential for fugitive dust from three sources at this site: Fines stockpiles, roadways/parking areas and material handling/processing. Stockpiles of pellets are not sources of significant amounts of fugitive emissions. Tube City IMS will implement the following fugitive emission control procedures on an as needed basis.

Control Plan

- A. Person responsible for plan implementation:
Site Manager

- B. Owner/operator responsible for plan implementation:
Tube City IMS
One North Broadway
Gary, IN 46404

- C. This facility is operated within the US Steel site. Tube City IMS operates the following fugitive sources on this site:
 - 1 Stockpiles
 - 2 Roadways and Parking Areas
 - 3 Material Handling Activity

- D. Conditions Requiring Control Measures
 - 1. Control measures shall be implemented when daily or special visible emissions readings indicate abnormal fugitive emissions from one or more of the above listed fugitive sources.

- E. Control Measures
 - 1. Fines Stockpile Control Measures:
 - (a) Fines storage piles showing abnormal fugitive emissions from wind erosion shall be wetted with water or water/surfactant mixture as required to control emissions. Rainfall is an acceptable water supply.

 - (b) Active areas of fines stockpiles showing abnormal fugitive emissions shall be sprayed with water or water/surfactant mixture during and after load-out as required to prevent excessive emissions.

2. Roadway/Parking Areas Control Measures:

- (a) All Tube City IMS maintained unpaved roadways subject to mobile equipment traffic showing abnormal fugitive emissions should be treated with a dust suppressant of Tube City IMS choice as frequently as necessary to prevent excessive emissions. Alternatively, unpaved roads may be watered.
- (b) Chemically treated unpaved roads showing abnormal fugitive emissions may be water washed, if appropriate, to remove any silt build-up
- (c) Tube City IMS supervisors and water truck operator shall monitor road conditions and advise the Site Manager when abnormal fugitive emissions indicate action is needed.
- (d) Tube City IMS is not required to spray on days where there has been 0.1 inch or greater precipitation within the previous 24 hours. However, the Site Manager is responsible for observing conditions and determining whether additional applications are needed. Tube City IMS must record all instances where weather conditions prevent the application of normally required control measures.

3. Material Handling Control Measures

- (a) Additional water or water/surfactant mixture may be applied where necessary to control material handling emissions.
- (b) During stocking and de-stocking operations showing abnormal fugitive emissions, front-end loader bucket drop height shall be minimized to the lowest practical level. Equipment operators shall be instructed to use care when unloading materials. Dump truck loads must be dumped slowly.

F. Control Interruptions and Countermeasures

1. Stockpiles

- (a) Fines stockpiles contain >1.5% moisture to control emissions.
- (b) Fine and pellet stockpiles shall be watered as necessary to control emissions. Pellets and fines cannot be processed if too wet, and mill will not accept excessively watered material.

2. Roadways/Parking Areas

- (a) During periods when the water/chemical truck is down for repairs, arrangements will be made with host mill or other local contractors for this service.

3. Material Handling Activity

- (a) Normal operating procedures do not result in excess fugitive emissions. Should these activities result in excess fugitive emissions, the Site Manager should evaluate the material being processed. The Site Manager will determine the amount and location of dust suppressant to be applied to avoid excess emissions.

G. Record Keeping Requirements

1. A Fugitive Dust Control and Exceptions Log will be maintained to record all specifics of abnormal visible emissions from roads, fines stockpiles, and equipment; as well as control application and maintenance, including the following:
 - (a) Date and time of notation of Abnormal Visible Emissions;
 - (b) Source and location;
 - (c) Control response;
 - (d) Duration of application
 - (e) Date and time of application
 - (f) Width of application
 - (g) Method of application
 - (h) Water/chemical quantity
 - (i) Chemical name and concentration
 - (j) MSDS for chemicals used
 - (k) Instances and reasons when weather or other conditions prevent the application of normally required roadway control measures.

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

**Technical Support Document (TSD) for a
Part 70 Significant Source Modification
and an Administrative Part 70 Permit**

Source Description and Location

Source Name:	Tube City IMS, Contractor of US Steel - Gary Works
Source Location:	One North Broadway, Gary, IN 46402
County:	Lake
SIC Code:	7389
Significant Source Modification No.:	089-32054-00564
Administrative Part 70 No.:	T089-32088-00564
Permit Reviewer:	Madhurima Moulik

On June 26, 2012, the Office of Air Quality received a permit application from Tube City IMS related to the installation of an iron ore screening plant.

Source Definition

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

- (a) US Steel, Gary Works (089-00121), the primary operation, located at One North Broadway, Gary, IN 46402; and
- (b) Tube City IMS (089-00564), the supporting operation, located at One North Broadway, Gary, IN 46402

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

Separate Part 70 permits will be issued to US Steel - Gary Works (089-7663-00121) and Tube City IMS (089-00564) solely for administrative purposes.

Existing Approvals

There have been no previous approvals issued to this source.

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.

Pollutant	Designation
	Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Attainment effective May 11, 2010, 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 The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Effective July 20, 2012, U. S. EPA has designated Lake County as nonattainment for the 8-hour ozone standard. Unclassifiable or attainment effective February 6, 2012, for PM _{2.5} .	

- (a) **Ozone Standards**
 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. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Lake County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
 Lake County has been classified as attainment for PM_{2.5}. On May 8, 2008, U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM_{2.5} emissions. These rules became effective on July 15, 2008. On May 4, 2011, the air pollution control board issued an emergency rule establishing the direct PM_{2.5} significant level at ten (10) tons per year. This rule became effective June 28, 2011. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this source is classified as a integrated iron and steel mill, it is considered one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Source Status

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (ton/yr)
PM	>100
PM ₁₀	>100
PM _{2.5}	>100
SO ₂	>100
VOC	>100
CO	>100
NO _x	>100
HAPs	>10/25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major stationary source for ozone, under nonattainment new source review rules (326 IAC 2-1.1-5) since VOC and NO_x are emitted at a rate of 100 tons per year or more.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are 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, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a source modification application, submitted by Tube City IMS on June 26, 2012, relating to the installation and operation of two (2) iron pellet screening plants. The following is a list of the proposed emission units:

- (a) One (1) iron ore pellet screening plant, identified as North Plant unit 01, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (b) One (1) iron ore pellet screening plant, identified as South Plant unit 02, permitted in 2012, with a nominal capacity of 600 tons per hour, using screens and conveyers to process iron ore pellets.
- (c) Loaders for loading/unloading and transporting iron ore pellets on unpaved roads.
- (d) Storage piles.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A and Appendix B of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Increase in PTE Before Controls of the Modification	
Pollutant	Potential To Emit (ton/yr)
PM	32.07
PM ₁₀	12.70
PM _{2.5}	1.63
SO ₂	Negligible
VOC	Negligible
CO	Negligible
NO _x	Negligible
Single HAPs	Negligible
Total HAPs	Negligible

Appendix B of this TSD reflects the unrestricted potential emissions of the modification.

This source modification is subject to significant source modification rules because the potential to emit of PM exceeds twenty-five tons per year, and therefore does not qualify for a minor source modification according to 326 IAC 2-7-10.5(e)(3)(A). Additionally, the modification will be incorporated into an administrative Part 70 Operating Permit in lieu of a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because the modification requires significant changes in existing monitoring Part 70 permit terms and conditions.

Permit Level Determination – PSD

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 administrative Part 70 permit, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons per year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	CO ₂ e	Total HAPs	Worst Single HAP
North Plant Total Controlled PTE	15.35	6.3	0.84	0.0	0.0	0.0	0.0	0.0	0.0	0.0
South Plant Total Controlled PTE	9.60	3.58	0.43	0.0	0.0	0.0	0.0	0.0	0.0	0.0
PSD Significant Levels	25	15	10	40	40	40	100	75,000	-	-
Tube City TOTAL PTE	24.95	9.88	1.27	0.0	0.0	0.0	0.0	0.0	0.0	0.0

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing minor stationary source is not major because the emissions increase is less than the Emission Offset. Therefore, pursuant to 326 IAC 2-1.1-5, nonattainment NSR requirements do not apply.

This modification is in the contemporaneous period for SSM No. 089-28848-00121 issued to U.S. Steel - Gary Works (the primary source) on August 4, 2010. The following table summarizes the emissions increases from all emission units permitted in SSM No. 089-28848-00121 and the proposed emission units in SSM No. 089-32054-00564. Also included is the contemporaneous emissions increases for MSM 089-31998-00173 (Mid-Continent Coal and Coke Company, a contractor at U. S. Steel, Gary Works).

Process / Emission Unit	Potential to Emit (ton/yr)						
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x
Net Emissions Increase for SSM 089-28848-00121	-213.03	-236.71	-294.50	-36.74	-663.55	-3012.66	-892.79
Emissions increase for MSM 089-31998-00173	8.99	3.91	0.93	---	---	---	---
Emissions Increase for SSM 089-32054-00564	24.95	9.88	1.27	---	---	---	---
Updated Net Emissions Increase	-179.09	-222.92	-292.3	-36.74	-663.55	-3012.66	-892.79
Significant Level 326 IAC 2-2 (PSD)	25	15	n/a	40	n/a	100	40

The updated netting analysis demonstrates that there is net emissions decreases in SSM No. 089-28848-00121 (for U. S. Steel - Gary Works), making 326 IAC 2-2 not applicable.

Federal Rule Applicability Determination

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets 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.

No emission unit at the plant is controlled by a control device. Therefore CAM does not apply to any emission unit at the plant.

NSPS

- (a) 326 IAC 12 and 40 CFR Part 60, Subpart LL – Standards of Performance for Metallic Mineral processing Plants – This source is not subject to NSPS, Subpart LL because this source does not produce metallic mineral concentrates from ore or it does not mine ore. The pellet has already been processed into a concentrate by another company when it

arrives at Tube City IMS. The plant operation only involves screening out fines from the pelletized iron ore for use at US Steel, Gary Works.

NESHAP

- (b) Tube City IMS is not subject to NESHAP, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE), because it does not have engines to run the equipment at the plant.

State Rule Applicability Determination

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration)

US Steel is an existing major source. Tube City IMS was determined to be a part of US Steel. Therefore, Tube City IMS is considered an existing major source. The total limited PM, PM-10, and PM2.5 emissions from Tube City IMS are less than 25, 15, and 10 tons per year, making this modification to a major stationary minor under 326 IAC 2-2.

Compliance with a throughput limitation of 8,180,000 tons of material per twelve (12) consecutive month period, in conjunction with a moisture content requirement of 1.5%, shall limit the PM emissions, including fugitive emissions, to less than 25 tons per year, PM10 to less than 15 tons/yr and PM2.5 to less than 10 tons/year. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Lake County with potential to emit greater than or equal to 2500 tons per year of nitrogen oxides and 250 tons of volatile organic compounds per year based upon combined PTE from US Steel –Gary Works and Tube City IMS. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2013 and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1-1 (Opacity Limitations)

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

- (1) 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.
- (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6.8-8 (Continuous Compliance Plan)

- (1) Pursuant to 326 IAC 6.8-8-1, the Permittee shall submit to IDEM no later than ninety (90) days after the issuance of this permit and maintain at the source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.
- (2) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. If required by IDEM, OAQ, the Permittee shall submit the updated CCP to IDEM, OAQ within thirty (30) days of the update.
- (3) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by

the CCP at the source, or submit updates to a CCP is a violation of 326 IAC 6.8-8.

326 IAC 6.8-10 (Fugitive Particulate Matter)

Pursuant to 326 IAC 6.8-10-1, this rule applies to sources, in Lake County with potential to emit five (5) tons per year of fugitive particulate matter. Tube City IMS has the potential to emit five (5) tons per year of fugitive particulate matter. Therefore, it is subject to the requirements of this rule.

Pursuant to 326 IAC 6.8-10-3 (Particulate Matter Emissions Limitations), the particulate matter emissions from source wide activities shall meet the following requirements:

For Paved Roads and Parking Lots:

The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%). A source shall implement the control measures specified by section 4(3)(F) of this rule within twenty-four (24) hours after notification by the department or the U.S. EPA of violating the average instantaneous opacity limit. A violation of the instantaneous average opacity limits in this section is a violation of this article. In addition, when requested by the department or the U.S. EPA after an exceedance of the opacity limit is observed by a representative of either agency, the source shall initiate a compliance check with the surface silt loading limit. The department may require a revision of the control plan under section 4(8) of this rule if the test shows an exceedance of the surface silt loading limit. The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

- (i) The first will be taken at the time of emission generation.
- (ii) The second will be taken five (5) seconds later.
- (iii) The third will be taken five (5) seconds later or ten (10) seconds after the first. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

Unpaved roads and parking lots:

The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%). The department may request a revision of the control plan under section 4(8) of this rule if an observation shows an exceedance of the average instantaneous opacity limit. This revision may be instead of, or in addition to, pursuing an enforcement action for a violation of the limit. Average instantaneous opacity shall be determined according to the procedure described in subdivision (1) of this rule. The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the control plan required in section 4 of this rule.

Material transfer limits shall be as follows:

- (i) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (ii) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in section 2 of this rule or material

transfer for transportation within or outside the source.

The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9*. The opacity readings shall be taken at least four (4) feet from the point of origin.

Wind erosion from storage piles and exposed areas. The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. These limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9*, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9*.

Material transportation activities shall include the following:

There shall be a zero percent (0%) frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement. Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22*, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car.

The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%). Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:

- (aa) The first will be taken at the time of emission generation.
- (bb) The second will be taken five (5) seconds later.
- (cc) The third will be taken five (5) seconds later or ten (10) seconds after the first. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

Material processing facilities shall include the following:

- (i) The PM10 stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grain per dry standard cubic foot and ten percent (10%) opacity. Compliance with the concentration limitation shall be determined using the test methods found in 326 IAC 6.8-4. Compliance with the opacity limitation shall be determined by 40 CFR 60, Appendix A, Method 9*.
- (ii) The opacity of fugitive particulate emissions from a material processing facility, except crusher at which a capture system is not used, shall not exceed ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9*.
- (iii) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9*.

- (iv) There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or a part of the material processing equipment except from a vent in the building. Compliance with this standard shall be determined by 40 CFR 60, Appendix A, Method 22*.
- (v) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity. Compliance with the concentration standard shall be determined by 40 CFR 60, Appendix A, Method 5 or 17, and with the opacity standard by 40 CFR 60, Appendix A, Method 9*.

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

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

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan submitted on June 26, 2012.

326 IAC 6.8-11 (Particulate Matter Contingency Measures)

326 IAC 6.8-11(2) through (6) applies to Tube City IMS because it is subject to the requirements of 326 IAC 6.8-10-1(a).

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

Pursuant to 326 IAC 6-3-1(c)(3), the source is not subject to 326 IAC 6-3 because it is subject to Particulate emission limitations established in 326 IAC 6.8 that is more stringent than the limitations established in 326 IAC 6-3.

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.

326 IAC 8-3-2 (VOC: Cold Cleaner Operations)

The degreasing operations at this source that were constructed after January 1, 1980, are subject to the work practice requirements under 326 IAC 8-3-2.

326 IAC 8-3-5 (VOC: Cold Cleaner Degreaser Operation and Control)

The degreasing operations at this source that were constructed after July 1, 1990, are subject to the work practices under 326 IAC 8-3-5.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

The Pursuant to 326 IAC 8-9-6 (a) and (b), the Permittee shall comply with the recordkeeping requirements for all volatile liquid storage vessels at the site.

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 determination requirements applicable to this modification are as follows:

- (a) Compliance with the PSD minor emission limits in Condition D.1.1(c) requires a moisture content analysis of the material processed as follows: The Permittee shall perform moisture content analysis or use the results of the chemical analysis performed by US Steel-Gary Works on one sample of the screened pelletized iron ore taken every month.
- (b) The source is subject to 326 IAC 6.8 (Particulate Matter Limitations for Lake County), and the Fugitive Dust Control Plan (included as Appendix A to this permit), shall be implemented to control fugitive dust.

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

Visible emissions notations for the screening, conveying, loading/unloading and transporting exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere.

These monitoring conditions are necessary in order to demonstrate compliance with 326 IAC 2-2, 326 IAC 6.8, and 326 IAC 2-7.

Conclusion and Recommendation

The construction and operation of this iron pellet screening operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-32054-00564 and Administrative Part 70 Permit No. T089-32088-00564. The staff recommends to the Commissioner that this Part 70 Significant Source and Administrative Part 70 permit be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Madhurima Moulik at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 233-0868 or toll free at 1-800-451-6027 extension 3-0868.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

TSD Appendix A

Emissions calculations - Limited PTE

Source name:

Tube City IMS

Source Address:

One North Broadway, Gary, Indiana

SSM and Administrative Part 70 No.:

SSM 089-32054-00564/T089-32088-00564

Date:

11-Jul-12

Tube City IMS Emissions Summary

DESCRIPTION	UNCONTROLLED/CONTROLLED PTE		
	PM (tons/year)	PM-10 (tons/year)	PM-2.5 (tons/year)
NORTH PLANT			
Iron Ore Pellet Handling and Screening	5.96	1.99	0.24
Unpaved Roads	2.26	0.93	0.09
Stockpiles	7.14	3.38	0.51
TOTAL PTE NORTH PLANT	15.35	6.30	0.84
SOUTH PLANT			
Iron Ore Pellet Handling and Screening	5.96	1.99	0.24
Unpaved Roads	2.26	0.93	0.09
Stockpiles	1.38	0.65	0.10
TOTAL PTE SOUTH PLANT	9.60	3.58	0.43
SOURCEWIDE PTE	24.95	9.88	1.27

Emissions for a total limited annual throughput of

8,180,000 tons

TSD Appendix A
Emissions calculations - Limited PTE
Tube City IMS
One North Broadway, Gary, Indiana
SSM 089-32054-00564/T089-32088-00564
11-Jul-12

Source name:
Source Address:
SSM and Administrative Part 70 No.:
Date:

PM EMISSION ESTIMATES FOR IDENTICAL NORTH AND SOUTH PLANTS

TCIMS AT USS Gary

Ef(conveyor transfer controlled) = 0.00014 lbs/ton (Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

		Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS	%					
T1 - Front end loader pellet feed into hopper	100.0	600	4,090,000	0.084	573	0.286
T2 - Hopper to main feed conveyor (C1)	100.0	600	4,090,000	0.084	573	0.286
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	4,090,000	0.084	573	0.286
T4 - Screen (S1) to conveyor (C2)	95.0	570	3,885,500	0.080	544	0.272
T5 - Conveyor (C2) to pellet stockpile	95.0	570	3,885,500	0.080	544	0.272
T6 - Screen (S1) to conveyor (C3)	5.0	30	204,500	0.004	29	0.014
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	204,500	0.004	29	0.014
T8 - Conveyor (C4) to conveyor (C5)	5.0	30	204,500	0.004	29	0.014
T9 - Conveyor (C5) to fines stockpile	5.0	30	204,500	0.004	29	0.014
TOTAL (TRANSFERS)				0.428	2,920	1.460

Ef(screening controlled) = 0.00220 lbs/ton (Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

				Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING	%					
Screen S1	100.0	600	4,090,000	1.320	8,998	4.499
TOTAL (SCREENING)				1.320	8,998	4.499

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.43	2,920	1.46
Screening	1.32	8,998	4.50
Crushing	0.00	0	0.00
TOTAL PLANT	1.75	11,918	5.96

PM10 EMISSION ESTIMATES FOR NORTH AND SOUTH PLANTS
TCIMS AT USS Gary

Ef(conveyor transfer controlled) = 0.000046 lbs/ton (Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

	%	Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS						
T1 - Front end loader pellet feed into hopper	100.0	600	4,090,000	0.028	188	0.094
T2 - Hopper to main feed conveyor (C1)	100.0	600	4,090,000	0.028	188	0.094
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	4,090,000	0.028	188	0.094
T4 - Screen (S1) to conveyor (C2)	95.0	570	3,885,500	0.026	179	0.089
T5- Conveyor (C2) to pellet stockpile	95.0	570	3,885,500	0.026	179	0.089
T6 - Screen (S1) to conveyor (C3)	5.0	30	204,500	0.001	9	0.005
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	204,500	0.001	9	0.005
T8-Conveyor (C4) to conveyor (C5)	5.0	30	204,500	0.001	9	0.005
T9-Conveyor (C5) to fines stockpile	5.0	30	204,500	0.001	9	0.005
TOTAL (TRANSFERS)				0.141	960	0.480

Ef(screening controlled) = 0.00074 lbs/ton (Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

	%			Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING						
Screen S1	100.0	600	4,090,000	0.444	3,027	1.513
TOTAL (SCREENING)				0.444	3,027	1.513

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.14	960	0.48
Screening	0.44	3,027	1.51
Crushing	0.00	0	0.00
TOTAL PLANT	0.58	3,986	1.99

TSD Appendix A
Emissions calculations - Limited PTE
Tube City IMS
One North Broadway, Gary, Indiana
SSM 089-32054-00564/T089-32088-00564
11-Jul-12

Source name:
Source Address:
SSM and Administrative Part 70 No.:
Date:

PM2.5 EMISSION ESTIMATES FOR NORTH AND SOUTH PLANTS

TCIMS AT USS Gary

Ef(conveyor transfer controlled) = 0.000013 lbs/ton (Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

		Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS	%					
T1 - Front end loader pellet feed into hopper	100.0	600	4,090,000	0.008	53	0.027
T2 -Hopper to main feed conveyor (C1)	100.0	600	4,090,000	0.008	53	0.027
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	4,090,000	0.008	53	0.027
T4 - Screen (S1) to conveyor (C2)	95.0	570	3,885,500	0.007	51	0.025
T5- Conveyor (C2) to pellet stockpile	95.0	570	3,885,500	0.007	51	0.025
T6 - Screen (S1) to conveyor (C3)	5.0	30	204,500	0.000	3	0.001
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	204,500	0.000	3	0.001
T8-Conveyor (C4) to conveyor (C5)	5.0	30	204,500	0.000	3	0.001
T9-Conveyor (C5) to fines stockpile	5.0	30	204,500	0.000	3	0.001
TOTAL (TRANSFERS)				0.040	271	0.136

Ef(screening controlled) = 0.00005 lbs/ton (Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

				Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING	%					
Screen S1	100.0	600	4,090,000	0.030	205	0.102
TOTAL (SCREENING)				0.030	205	0.102

Source name:

Emissions calculations - Limited PTE

Source Address:

Tube City IMS

SSM and Administrative Part 70 No.:

One North Broadway, Gary, Indiana

Date:

SSM 089-32054-00564/T089-32088-00564

11-Jul-12

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.04	271	0.14
Screening	0.03	205	0.10
Crushing	0.00	0	0.00
TOTAL PLANT	0.07	476	0.24

TSD Appendix A
Emissions calculations - Limited PTE
Tube City IMS
One North Broadway, Gary, Indiana
SSM and Administrative Part 70 No.: SSM 089-32054-00564/T089-32088-00564
Date: 11-Jul-12

Source name:
Source Address:
SSM and Administrative Part 70 No.:
Date:

Estimated Emissions for Tube City IMS at USS Gary Iron Ore Pellet Screening

Fugitive Emissions from Unpaved Roadways at the North Plant

Unpaved Roadway Emissions

Vehicle	Vehicle Miles Travelled/Year Estimated	Mean Vehicle Weight (tons)	PM ⁽¹⁾ Emission Factor (lb/VMT)	PM-10 ⁽¹⁾ Emission Factor (lb/VMT)	PM-2.5 ⁽¹⁾ Emission Factor (lb/VMT)	Uncontrolled Emissions (tns/yr)			Controlled Emissions (tns/yr)		
						PM Typical	PM-10 Typical	PM-2.5 Typical	PM Typical	PM-10 Typical	PM-2.5 Typical
Dump trucks	11212	52	0.00	0.00	0.0000	0.000	0.000	0.000	0.000	0.000	0.000
Front End Loader (Cat 988)	4090	58	7.36	3.04	0.3040	15.058	6.216	0.622	2.259	0.932	0.093
	15302					15.058	6.216	0.622	2.259	0.932	0.093

Vehicle	Capacity (Tons)	Tons moved/year	Miles/trip	Trips /year	VMT
Dump Truck	38	852,083	0.5	22423.246	11211.62
Front End Loader	20	4,090,000	0.02	204500	4090

(1) For 2.5 months of the winter season, the lake is impassable

From AP-42, 13.2.2 (11/06), Equation (1a) & (2): emission factor = $[k (s/12)^a (W/3)^b]^{0.365-P}/365$

where:

k, a, and b are empirical constants

s = surface material silt content

W = mean vehicle weight

P = days with 0.01" precipitation or more

*Road Watering Control Efficiency 85%.

VMT = Vehicle Miles Travelled

Variable	Value		
	PM	PM-10	PM-2.5
k	4.90	1.50	0.15
a	0.70	0.90	0.90
b	0.45	0.45	0.45
s	6.00	6.00	6.00
P	130	130	130

TSD Appendix A
Emissions calculations - Limited PTE
Tube City IMS
One North Broadway, Gary, Indiana
SSM and Administrative Part 70 No.: SSM 089-32054-00564/T089-32088-00564
Date: 11-Jul-12

Estimated Emissions for Tube City IMS at USS Gary Iron Ore Pellet Scening

Fugitive Emissions from Unpaved Roadways at the South Plant

Unpaved Roadway Emissions

Vehicle	Vehicle Miles Travelled/Year Estimated	Mean Vehicle Weight (tons)	PM Emission Factor (lb/VMT)	PM-10 Emission Factor (lb/VMT)	PM-2.5 Emission Factor (lb/VMT)	Uncontrolled Emissions (tns/yr)			Controlled Emissions (tns/yr)		
						PM Typical	PM-10 Typical	PM-2.5 Typical	PM Typical	PM-10 Typical	PM-2.5 Typical
Dump trucks	0	52	7.01	2.89	0.2894	0.000	0.000	0.000	0.000	0.000	0.000
Front End Loader (Cat 988)	4090	58	7.36	3.04	0.3040	15.058	6.216	0.622	2.259	0.932	0.093
	4090					15.058	6.216	0.622	2.259	0.932	0.093

Vehicle	Capacity (Tons)	Tons moved/year	Miles/trip	Trips /year	VMT
Dump Truck	38	0	0	0	0
Front End Loader	20	4,090,000	0.02	204500	4090

From AP-42, 13.2.2 (11/06), Equation (1a) & (2): emission factor = $[k (s/12^2 (W/3)^b)]^{1/365} P$
 where:
 k, a, and b are emperical constants
 s = surface material silt content
 W = mean vehicle weight
 P = days with 0.01" precipitation or more

*Road Watering Control Efficiency 85%.
 VMT = Vehicle Miles Travelled

Variable	Value		
	PM	PM-10	PM-2.5
k	4.90	1.50	0.15
a	0.70	0.90	0.90
b	0.45	0.45	0.45
s	6.00	6.00	6.00
P	130	130	130

TSD Appendix A

Emissions calculations - Limited PTE

Source name: Tube City IMS
Source Address: One North Broadway, Gary, Indiana
SSM and Administrative Part 70 SSM 089-32054-00564/T089-32088-00564
Date: 11-Jul-12

Fugitive Emissions from Stockpiles at the North Plant

Stockpile Emissions

Stockpile	Emission factor (lb/ton)			Throughput Tons	Emissions (tons/year)		
	PM	PM10	PM2.5		PM	PM10	PM2.5
Iron ore pellets	0.01351	0.00639	0.00097	852083	5.76	2.72	0.41
Fines	0.01351	0.00639	0.00097	204500	1.38	0.65	0.10
				Total	7.14	3.38	0.51

From AP-42, 13.2.4 (11/06), Equation (1): Emission factor = $k (0.0032(U/5)^{1.3}/(M/2)^{1.4}$

where:

k = Particle size multiplier (dimensionless)

U = mean wind speed. m/s or mph

M = material moisture content

There is no dust abatement for the stockpiles

Variable	Value		
	PM	PM-10	PM-2.5
k	0.74	0.35	0.053
U	14.00	14.00	14.00
M	1.50	1.50	1.50

TSD Appendix A
Emissions calculations - Limited PTE
Tube City IMS
One North Broadway, Gary, Indiana
SSM and Administrative Part 70 No.: SSM 089-32054-00564/T089-32088-00564
Date: 11-Jul-12

Estimated Emissions for Tube City IMS at USS Gary Iron Ore Pellet Scening

Fugitive Emissions from Stockpiles at the South Plant

Stockpile Emissions

Stockpile	Emission factor (lb/ton)			Throughput Tons	Emissions (tons/year)		
	PM	PM10	PM2.5		PM	PM10	PM2.5
Iron ore pellets	NA	NA	NA	NA	NA	NA	NA
Fines	0.01351	0.00639	0.00097	204500	1.38	0.65	0.10
				Total	1.38	0.65	0.10

From AP-42, 13.2.4 (11/06), Equation (1): Emission factor = $k (0.0032(U/5)^{1.3}/(M/2)^{1.4}$

where:

k = Particle size multiplier (dimensionless)

U = mean wind speed. m/s or mph

M = material moisture content

There is no dust abatement for the stockpiles

Variable	Value		
	PM	PM-10	PM-2.5
k	0.74	0.35	0.053
U	14.00	14.00	14.00
M	1.50	1.50	1.50

Source name:
 Source Address:
 SSM and Administrative Part 70 No.:
 Date:

Tube City IMS Emissions Summary

DESCRIPTION	UNCONTROLLED/CONTROLLED PTE		
	PM (tons/year)	PM-10 (tons/year)	PM-2.5 (tons/year)
NORTH PLANT			
Iron Ore Pellet Handling and Screening	7.66	2.56	0.31
Unpaved Roads	2.90	1.20	0.12
Stockpiles	9.17	4.34	0.66
TOTAL PTE NORTH PLANT	19.73	8.10	1.08
SOUTH PLANT			
Iron Ore Pellet Handling and Screening	7.66	2.56	0.31
Unpaved Roads	2.90	1.20	0.12
Stockpiles	1.77	0.84	0.13
TOTAL PTE SOUTH PLANT	12.34	4.60	0.55
SOURCEWIDE PTE	32.07	12.70	1.63

These are the emissions for a total annual throughput of **10,512,000** tons

Source name:
 Source Address:
 SSM and Administrative Part 70 No.:
 Date:

PTE: PM

Ef(conveyor transfer controlled) =

0.00014 lbs/ton

(Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

		Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS	%					
T1 - Front end loader pellet feed into hopper	100.0	600	5,256,000	0.084	736	0.368
T2 - Hopper to main feed conveyor (C1)	100.0	600	5,256,000	0.084	736	0.368
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	5,256,000	0.084	736	0.368
T4 - Screen (S1) to conveyor (C2)	95.0	570	4,993,200	0.080	699	0.350
T5 - Conveyor (C2) to pellet stockpile	95.0	570	4,993,200	0.080	699	0.350
T6 - Screen (S1) to conveyor (C3)	5.0	30	262,800	0.004	37	0.018
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	262,800	0.004	37	0.018
T8 - Conveyor (C4) to conveyor (C5)	5.0	30	262,800	0.004	37	0.018
T9 - Conveyor (C5) to fines stockpile	5.0	30	262,800	0.004	37	0.018
TOTAL (TRANSFERS)				0.428	3,753	1.876

Ef(screening controlled) =

0.00220 lbs/ton

(Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

				Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING	%					
Screen S1	100.0	600	5,256,000	1.320	11,563	5.782
TOTAL (SCREENING)				1.320	11,563	5.782

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.43	3,753	1.88
Screening	1.32	11,563	5.78
Crushing	0.00	0	0.00
TOTAL PLANT	1.75	15,316	7.66

Source name:
 Source Address:
 SSM and Administrative Part 70 No.:
 Date:

PTE PM-10

Ef(conveyor transfer controlled) = 0.000046 lbs/ton (Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

		Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS	%					
T1 - Front end loader pellet feed into hopper	100.0	600	5,256,000	0.028	242	0.121
T2 - Hopper to main feed conveyor (C1)	100.0	600	5,256,000	0.028	242	0.121
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	5,256,000	0.028	242	0.121
T4 - Screen (S1) to conveyor (C2)	95.0	570	4,993,200	0.026	230	0.115
T5 - Conveyor (C2) to pellet stockpile	95.0	570	4,993,200	0.026	230	0.115
T6 - Screen (S1) to conveyor (C3)	5.0	30	262,800	0.001	12	0.006
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	262,800	0.001	12	0.006
T8 - Conveyor (C4) to conveyor (C5)	5.0	30	262,800	0.001	12	0.006
T9 - Conveyor (C5) to fines stockpile	5.0	30	262,800	0.001	12	0.006
TOTAL (TRANSFERS)				0.141	1,233	0.617

Ef(screening controlled) = 0.00074 lbs/ton (Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

				Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING	%					
Screen S1	100.0	600	5,256,000	0.444	3,889	1.945
TOTAL (SCREENING)				0.444	3,889	1.945

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.14	1,233	0.62
Screening	0.44	3,889	1.94
Crushing	0.00	0	0.00
TOTAL PLANT	0.58	5,122	2.56

Source name:

Tube City IMS

Source Address:

One North Broadway, Gary, Indiana

SSM and Administrative Part 70 No.:

SSM 089-32054-00564/T089-32088-00564

Date:

7/11/2012

PTE PM2.5

Ef(conveyor transfer controlled) =

0.000013 lbs/ton

(Source: Table 11.19.2-2, conveyor transfer (controlled), AP-42, 8/04) See footnote b

		Raw Material Throughputs		Uncontrolled/Controlled Emissions		
		Average Throughput (tons/hr)	Amount Loaded or Transferred (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
TRANSFERS	%					
T1 - Front end loader pellet feed into hopper	100.0	600	5,256,000	0.008	68	0.034
T2 -Hopper to main feed conveyor (C1)	100.0	600	5,256,000	0.008	68	0.034
T3 - Main feed conveyor (C1) to screen (S1)	100.0	600	5,256,000	0.008	68	0.034
T4 - Screen (S1) to conveyor (C2)	95.0	570	4,993,200	0.007	65	0.032
T5- Conveyor (C2) to pellet stockpile	95.0	570	4,993,200	0.007	65	0.032
T6 - Screen (S1) to conveyor (C3)	5.0	30	262,800	0.000	3	0.002
T7 - Conveyor (C3) to conveyor (C4)	5.0	30	262,800	0.000	3	0.002
T8-Conveyor (C4) to conveyor (C5)	5.0	30	262,800	0.000	3	0.002
T9-Conveyor (C5) to fines stockpile	5.0	30	262,800	0.000	3	0.002
TOTAL (TRANSFERS)				0.040	348	0.174

TSD Appendix B

Emissions calculations - Unrestricted PTE

Source name:

Tube City IMS

Source Address:

One North Broadway, Gary, Indiana

SSM and Administrative Part 70 No.:

SSM 089-32054-00564/T089-32088-00564

Date:

7/11/2012

Ef(screening controlled) =

0.00005 lbs/ton

(Source: Table 11.19.2-2, screening (controlled), AP-42 8/04) See footnote b

		Uncontrolled/Controlled Emissions				
		Average Throughput (tons/hr)	Amount Screened (tons/yr)	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
SCREENING	%					
Screen S1	100.0	600	5,256,000	0.030	263	0.131
TOTAL (SCREENING)				0.030	263	0.131

	Uncontrolled/Controlled Emissions		
	Hourly Emission Rate (lb/hr)	Annual Emission Rate (lbs/yr)	Annual Emission Rate (tons/yr)
Separator Plant Operations			
Transfers	0.04	348	0.17
Screening	0.03	263	0.13
Crushing	0.00	0	0.00
TOTAL PLANT	0.07	611	0.31

Source name: Tube City IMS

Source Address: One North Broadway, Gary, Indiana

SSM and Administrative Part 7 SSM 089-32054-00564/T089-32088-00564

Date: 7/11/2012

Fugitive Emissions from Unpaved Roadways at the North Plant

Unpaved Roadway Emissions

Vehicle	Vehicle Miles Travelled/Year Estimated	Mean Vehicle Weight (tons)	PM ⁽¹⁾ Emission Factor (lb/VMT)	PM-10 ⁽¹⁾ Emission Factor (lb/VMT)	PM-2.5 ⁽¹⁾ Emission Factor (lb/VMT)	Uncontrolled Emissions (tns/yr)			Controlled Emissions (tns/yr)		
						PM Typical	PM-10 Typical	PM-2.5 Typical	PM Typical	PM-10 Typical	PM-2.5 Typical
Dump trucks	14408	52	0.00	0.00	0.0000	0.000	0.000	0.000	0.000	0.000	0.000
Front End Loader (Cat 988)	5256	58	7.36	3.04	0.3040	19.351	7.988	0.799	2.903	1.198	0.120
	19664				Total	19.351	7.988	0.799	2.903	1.198	0.120

Vehicle	Capacity (Tons)	Tons moved/year	Miles/trip	Trips /year	VMT
Dump Truck	38	1,095,000	0.5	28815.789	14407.89
Front End Loader	20	5,256,000	0.02	262800	5256

(1) For 2.5 months of the winter season, the lake is impassable and the raw feed iron ore that is typically transported by barge has to be trucked to the plant via dump truck a distance of 0.5 miles. However since the ground is typically frozen or saturated with moisture there are no emissions associated with this activity.

From AP-42, 13.2.2 (11/06), Equation (1a) & (2): emission factor = $[k (s/12)^a (W/3)^b]^{0.75} [365-P]/365$

where:

k, a, and b are empirical constants

s = surface material silt content

W = mean vehicle weight

P = days with 0.01" precipitation or more

*Road Watering Control Efficiency 85%.

VMT = Vehicle Miles Travelled

Variable	Value		
	PM	PM-10	PM-2.5
k	4.90	1.50	0.15
a	0.70	0.90	0.90
b	0.45	0.45	0.45
s	6.00	6.00	6.00
P	130	130	130

Source name:

Tube City IMS

Source Address:

One North Broadway, Gary, Indiana

SSM and Administrative Part

SSM 089-32054-00564/T089-32088-00564

Date:

7/11/2012

Fugitive Emissions from Unpaved Roadways at the South Plant

Unpaved Roadway Emissions

Vehicle	Vehicle Miles Travelled/Year	Mean Vehicle Weight (tons)	PM Emission Factor (lb/VMT)	PM-10 Emission Factor (lb/VMT)	PM-2.5 Emission Factor (lb/VMT)	Uncontrolled Emissions (tns/yr)			Controlled Emissions (tns/yr)			
						PM Typical	PM-10 Typical	PM-2.5 Typical	PM Typical	PM-10 Typical	PM-2.5 Typical	
Dump trucks	0	52	7.01	2.89	0.2894	0.000	0.000	0.000	0.000	0.000	0.000	
Front End Loader (Cat 988)	5256	58	7.36	3.04	0.3040	19.351	7.988	0.799	2.903	1.198	0.120	
	5256					Total	19.351	7.988	0.799	2.903	1.198	0.120

Vehicle	Capacity (Tons)	Tons moved/year	Miles/trip	Trips /year	VMT
Dump Truck	38	0	0	0	0
Front End Loader	20	5,256,000	0.02	262800	5256

From AP-42, 13.2.2 (11/06), Equation (1a) & (2): emission factor = $[k (s/12^a (W/3)^b)]^{365-P}/365$

where:

k, a, and b are empirical constants

s = surface material silt content

W = mean vehicle weight

P = days with 0.01" precipitation or more

*Road Watering Control Efficiency 85%.

VMT = Vehicle Miles Travelled

Variable	Value		
	PM	PM-10	PM-2.5
k	4.90	1.50	0.15
a	0.70	0.90	0.90
b	0.45	0.45	0.45
s	6.00	6.00	6.00
P	130	130	130

Source name:

Tube City IMS

Source Address:

One North Broadway, Gary, Indiana

SSM and Administrative Part 70 No.:

SSM 089-32054-00564/T089-32088-00564

Date:

7/11/2012

Fugitive Emissions from Stockpiles at the North Plant

Stockpile Emissions

Stockpile	Emission factor (lb/ton)			Throughput Tons	Emissions (tons/year)		
	PM	PM10	PM2.5		PM	PM10	PM2.5
Iron ore pellets	0.01351	0.00639	0.00097	1095000	7.40	3.50	0.53
Fines	0.01351	0.00639	0.00097	262800	1.77	0.84	0.13
				Total	9.17	4.34	0.66

From AP-42, 13.2.4 (11/06), Equation (1): Emission factor = $k (0.0032(U/5)^{1.3}/(M/2)^{1.4}$

where:

k = Particle size multiplier (dimensionless)

U = mean wind speed. m/s or mph

M = material moisture content

There is no dust abatement for the stockpiles

Variable	Value		
	PM	PM-10	PM-2.5
k	0.74	0.35	0.053
U	14.00	14.00	14.00
M	1.50	1.50	1.50



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: Michael J Connolly
Tube City IMS
1155 Business Ctr Dr
Horsham, PA 19044

DATE: September 12, 2012

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

SUBJECT: Final Decision
Title V
089-32088-00564

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:
Responsible Official (US Steel Gary Works)
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

September 12, 2012

TO: Dubois Public Library

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

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

Applicant Name: Tube City IMS
Permit Number: 089-32088-00564

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 9/12/2012 Tube City IMS 089-32088-00564 (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		Michael J Connolly Tube City IMS 1155 Business Ctr Dr Horsham PA 19044 (Source CAATS)										
2		Spencer Hill VP - Ops Tube City IMS 1155 Business Center Dr Horsham PA 19044 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
7		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
8		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
9		Mark Coleman 107 Diana Road Portage IN 46368 (Affected Party)										
10		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
11		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
12		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
13		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
14		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
15		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See 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.
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Mail Code 61-53

IDEM Staff	CDENNY 9/12/2012 Tube City IMS 089-32088-00564 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling 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		Karen 8212 Madison Ave Munster IN 46321-1627 (Affected Party)									
2		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)									
3		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
4		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)									
5		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)									
6		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)									
7		Responsible Official US Steel Gary Works 1350 Penn Ave. Ste 200 Pittsburgh PA 15222 (Source – addl contact)									
8		Dubois Public Library 1835 Broadway Gary IN 46407 (Library)									
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See 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.
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