



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Part 70 Operating Permit

for SMS Mill Services, LLC in Porter County

Part 70 Operating Permit Renewal No.: T127-36765-00076

The Indiana Department of Environmental Management (IDEM) has received an application from SMS Mill Services, LLC located at 250 West US Highway 12, Burns Harbor, IN 46304 for a renewal of its Part 70 Operating Permit issued on October 26, 2011. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow from SMS Mill Services, LLC to continue to operate its existing source.

This draft Part 70 Operating Permit Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Westchester Public Library
200 West Indiana Avenue
Chesterton, IN 46304

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting,

you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T127-36765-00076 in all correspondence.

Comments should be sent to:

Monica Dick
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 4-1243
Or dial directly: (317) 234-1243
Fax: (317) 232-6749 attn: Monica Dick
E-mail: mdick@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Monica Dick of my staff at the above address.



Josiah K. Balogun, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

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DRAFT

Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**SMS Mill Services, LLC
250 West US Highway 12
Burns Harbor, Indiana 46304**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

| | |
|---|------------------|
| Operation Permit No.: T127-36765-00076 | |
| Issued by: | Issuance Date: |
| Josiah K. Balogun, Section Chief Permits Branch Office of Air Quality | Expiration Date: |

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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(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary an on-site scrap metal reclamation process.

| | |
|------------------------------|--|
| Source Address: | 250 West US Highway 12, Burns Harbor, Indiana 46304 |
| General Source Phone Number: | (219) 787-1341 |
| SIC Code: | 3312 Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills 5093 Scrap and Waste Materials |
| County Location: | Porter |
| 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 Emission Offset Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories |

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

This source consists of:

- (a) ArcelorMittal Burns Harbor, LLC (plant ID 127-00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (b) SMS Mill Services, LLC (plant ID 127-00076), the supporting operation, is located at U.S. Highway 12, Burns Harbor, Indiana.

These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ArcelorMittal Burns Harbor, LLC and SMS Mill Services, LLC as one source

Separate Part 70 permits have been issued to ArcelorMittal Burns Harbor, LLC and SMS Mill Services, LLC 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(14)]

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

- (a) One (1) steel vertical grinding mill, constructed in 1989, used to nuggetize scrap steel at a maximum capacity of ten (10) tons per hour of scrap steel, identified as EU002-07, with particulate matter controlled by two (2) baghouses collectively identified as C002-9201, collectively exhausting to one (1) stack EP002-9201.
- (b) One (1) 2.7 MMBtu per hour natural gas-fired open air scrap metal torch cutting operation identified as EU 002-06a, using a maximum of fourteen (14) hand torches, each with a maximum capacity of cutting 5 tons per hour, with fugitive emissions EP 002-9202a.

- (c) One (1) 2.7 MMBtu per hour natural gas-fired open air slab thermal cutting operation, identified as EU 002-06b, using a maximum of thirteen (13) automated track burners, each with a maximum capacity of cutting 5 tons per hour, located in the big gun area, with fugitive emissions EP 002-9202b.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9]
- (b) Degreasing operations using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs. [326 IAC 8-3]
- (c) 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 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm 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 twelve (12) months. [326 IAC 8-3]

A.5 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of trucks, small equipment and automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (b) VOC and HAP storage containers consisting of: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (d) Filter or coalescer media changeout.
- (e) Activities with emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)]:
 - (1) One (1) cast break operation, identified as EU 002-08, breaking a maximum capacity of 12,000 tons per month of metal scrap (400 tons per hour), with fugitive emissions EP 002-9203.
 - (2) One (1) scrap baling machine, identified as 9207, baling a maximum capacity of 15,000 tons per month (500 tons per hour) of metal scrap.
- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

A.6 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

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

- (a) This permit, T127-36765-00076, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

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

- (a) 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(35), 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(35).

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

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

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

and

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

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

- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require 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(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)][326 IAC 1-6-3]

- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:

- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or 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(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ 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) 464-0233; fax: (219) 464-0553.

- (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(35).

- (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)(8) 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.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T127-36765-00076 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 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(35).

- (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.16 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(42). 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(35).

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.17 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(35).

(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.18 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.19 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) or (c) 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) and (c)(1). 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) and (c)(1).

- (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(37)) 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(35).

- (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.20 Source Modification Requirement [326 IAC 2-7-10.5]

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

B.21 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.22 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(35).

- (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.23 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.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]
- For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator 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.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.
- C.7 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.8 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(35).

- (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.9 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(35).

- (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(35).
- (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.10 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.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, 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(35).

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. The analog instrument shall be capable of measuring values outside of the normal range.
- (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 maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) 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(11)][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(35).

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]

In accordance with the compliance schedule specified in 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).

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:

- (AA) All calibration and maintenance records.
- (BB) All original strip chart recordings for continuous monitoring instrumentation.
- (CC) Copies of all reports required by the Part 70 permit.

Records of required monitoring information include the following, where applicable:

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. 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(35). 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) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) steel vertical grinding mill, constructed in 1989, used to nuggetize scrap steel at a maximum capacity of ten (10) tons per hour of scrap steel, identified as EU002-07, with particulate matter controlled by two (2) baghouses collectively identified as C002-9201, collectively exhausting to one (1) stack EP002-9201.

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

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

D.1.1 Prevention of Significant deterioration (PSD) Minor Limit [326 IAC 2-2]

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall with the limit below:

The particulate emissions from the one (1) steel vertical grinding mill, identified as EU002-07, shall not exceed 1.16 pounds per hour.

Compliance with this limit, in conjunction with PM potential to emit of other emission units at the source will ensure that the source-wide PM emissions are less than twenty-five (25) tons per year and render the requirements of 326 IAC 2-2 not applicable to steel vertical grinding mill.

D.1.2 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the vertical grinding mill EU002-07 shall not exceed 19.18 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

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

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

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

D.1.3 Particulate Control [326 IAC 2-7-6(6)]

- (a) In order to comply with Conditions D.1.1 and D.1.2, the two (2) baghouses identified as C002-9201, for particulate control shall be in operation and control emissions from the steel vertical grinding mill at all times that the steel vertical grinding mill is in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

Not later than 180 days after the issuance date of this permit, Permit No T127-36765-00076, the

Permittee shall perform PM testing of the steel vertical grinding mill, identified as EU002-07 utilizing methods approved by the commissioner at least once every 5 years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.

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

D.1.5 Visible Emissions Notations

- (a) Visible emission notations of two (2) baghouses, identified as C002-9201, stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

- (a) The Permittee shall record the pressure drop across the two (2) baghouses, identified as C002-9201, used in conjunction with the steel vertical grinding mill, at least once per day when the steel vertical grinding mill, is in operation. When for any one (1) reading, the pressure drop across the baghouses is outside the normal range of 0.2 and 6.0 inches of water for C002-9201, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

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.1.5, the Permittee shall maintain a daily record of visible emission notations of the two (2) baghouses, identified as C002-9201, stack 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).
- (b) To document the compliance status with Condition D.1.6, the Permittee shall maintain

daily records of pressure drop across the baghouses. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (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.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Insignificant Activities:

- (a) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9]
- (b) Degreasing operations using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs. [326 IAC 8-3-2][326 IAC 8-3]
- (c) 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 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm 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 twelve (12) months. [326 IAC 8-3]

(The information describing the process contained in this emissions unit 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]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall:

- (a) Ensure the following control equipment and operating requirements are met:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is

heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
- (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.2.2 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial 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).

D.2.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-6]

Pursuant to 326 IAC 8-9-6(b) (Volatile Organic Liquid Storage Vessels), the source shall maintain and record and submit to the department a report containing the following information for each vessel:

- (1) The vessel identification number.
- (2) The vessel dimensions.
- (3) The vessel capacity.

D.2.4 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and their associated control devices. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

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

D.2.5 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operations. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

- (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (b) One (1) natural gas-fired open air scrap metal torch cutting operation identified as EU 002-06a, using a maximum of fourteen (14) hand torches, with fugitive emissions EP 002-9202a.
- (c) One (1) natural gas-fired open air slab thermal cutting operation, identified as EU 002-06b, using a maximum of thirteen (13) automated track burners, located in the big gun area, with fugitive emissions EP 002-9202b. [326 IAC 6-3-2]

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

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

D.3.1 Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2(e)]

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the EU 002-06a shall not exceed 47.77 pounds per hour when operating at a maximum process weight of 70 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the EU 002-06b shall not exceed 47.05 pounds per hour when operating at a maximum process weight of 65 tons per hour.

The pounds per hour limitations were calculated using the following equation:

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

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

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

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

Source Name: SMS Mill Services, LLC
Source Address: 250 West US Highway 12, Burns Harbor, Indiana 46304
Part 70 Permit No.: T127-36765-00076

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: SMS Mill Services, LLC
Source Address: 250 West US Highway 12, Burns Harbor, Indiana 46304
Part 70 Permit No.: T127-36765-00076

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, SO 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 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: SMS Mill Services, LLC
 Source Address: 250 West US Highway 12, Burns Harbor, Indiana 46304
 Part 70 Permit No.: T127-36765-00076

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: _____

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

| | |
|---------------------|--|
| Source Name: | SMS Mill Services, LLC |
| Source Location: | 250 West US Highway 12, Burns Harbor, IN 46304 |
| County: | Porter |
| SIC Code: | 3312 Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills 5093 Scrap and Waste Materials |
| Permit Renewal No.: | T127-36765-00076 |
| Permit Reviewer: | Monica Dick |

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from SMS Mill Services, LLC, relating to the operation of an on-site scrap metal reclamation process under contract with ArcelorMittal Burns Harbor, LLC. On January 27, 2016, SMS Mill Services, LLC submitted an application to the OAQ requesting to renew its operating permit. SMS Mill Services, LLC was issued its first Title V Operating Permit Renewal T127-29707-00076 on October 26, 2011.

The steel vertical grinding mill nuggetizes ruler size side trimmings from plates and the strip mill at ArcelorMittal Burns Harbor, LLC. The nuggets are then used at ArcelorMittal Burns Harbor, LLC or sold to other customers. The trimmings used to produce the nuggets are free from VOC containing products of any kind.

Source Definition

This Source Definition from the Part 70 Operating Permit Renewal was incorporated into this permit as follows:

This scrap metal reclamation operation is an on-site contractor of an integrated steel mill:

- (a) ArcelorMittal Burns Harbor, LLC (plant ID 127-00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (b) SMS Mill Services, LLC (plant ID 127-00076), the supporting operation, is located at U.S. Highway 12, Burns Harbor, Indiana.

IDEM has determined that ArcelorMittal Burns Harbor, LLC, and SMS Mill Services, LLC are under the common control of ArcelorMittal Burns Harbor, LLC. These two plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ArcelorMittal Burns Harbor, LLC and SMS Mill Services, LLC as one source.

Separate Part 70 permits have been issued to ArcelorMittal Burns Harbor, LLC and SMS Mill Services, LLC, solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) steel vertical grinding mill, constructed in 1989, used to nuggetize scrap steel at a maximum capacity of ten (10) tons per hour of scrap steel, identified as EU002-07, with

particulate matter controlled by two (2) baghouses collectively identified as C002-9201, collectively exhausting to one (1) stack EP002-9201.

- (b) One (1) 2.7 MMBtu per hour natural gas-fired open air scrap metal torch cutting operation identified as EU 002-06a, using a maximum of fourteen (14) hand torches, each with a maximum capacity of cutting 5 tons per hour, with fugitive emissions EP 002-9202a.
- (c) One (1) 2.7 MMBtu per hour natural gas-fired open air slab thermal cutting operation, identified as EU 002-06b, using a maximum of thirteen (13) automated track burners, each with a maximum capacity of cutting 5 tons per hour, located in the big gun area, with fugitive emissions EP 002-9202b.

| |
|---------------------------------|
| Insignificant Activities |
|---------------------------------|

The source consists of the following specifically regulated insignificant activities:

- (a) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9]
- (b) Degreasing operations using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs. [326 IAC 8-3-2] [326 IAC 8-3]
- (c) 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 degrees C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm 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 twelve (12) months. [326 IAC 8-3]

The source also consists of the following insignificant activities:

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of trucks, small equipment and automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (b) VOC and HAP storage containers consisting of: Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment.
- (d) Filter or coalescer media changeout.
- (e) Activities with emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)]:
 - (1) One (1) cast break operation, identified as EU 002-08, breaking a maximum capacity of 12,000 tons per month of metal scrap (400 tons per hour), with fugitive emissions EP 002-9203.
 - (2) One (1) scrap baling machine, identified as 9207, baling a maximum capacity of 15,000 tons per month (500 tons per hour) of metal scrap.

- (f) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

Existing Approvals

The source was issued Part 70 Operating Permit No. T127-29707-00076 on October 26, 2011. There have been no subsequent approvals issued.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Porter County.

| Pollutant | Designation |
|--|--|
| SO ₂ | Cannot be classified for the area bounded on the north by Lake Michigan; on the west by the Lake County and Porter County line; on the south by I-80 and I-90; and on the east by the LaPorte County and Porter County line. The remainder of Porter County is better than national standards. |
| CO | Unclassifiable or attainment effective November 15, 1990. |
| O ₃ | On June 11, 2012, the U.S. EPA designated Porter County nonattainment, for the 8-hour ozone standard. |
| PM _{2.5} | Unclassifiable or attainment effective February 6, 2012, for the annual PM _{2.5} standard. |
| PM _{2.5} | Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard. |
| PM ₁₀ | Unclassifiable effective November 15, 1990. |
| NO ₂ | Cannot be classified or better than national standards. |
| Pb | Unclassifiable or attainment effective December 31, 2011. |
| ¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area, including Porter County, for the 1-hour standard which was revoked effective June 15, 2005. 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 Porter County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3 for the 1-hour standard. ² The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228. | |

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Porter County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) 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 NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

- (b) **PM_{2.5}**
 Porter County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Porter County has been classified as attainment or unclassifiable in Indiana for SO₂, CO, PM₁₀, NO₂, and Pb. 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 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.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

| Unrestricted Potential Emissions | | | |
|---|--|-----------------------------------|------------------|
| | ArcelorMittal Burns Harbor, LLC | SMS Mill Services, LLC | Entire Source |
| Pollutant | Tons/year | Tons/year | Tons/year |
| PM | greater than 100 | less than 100 | greater than 100 |
| PM ₁₀ | greater than 100 | less than 100 | greater than 100 |
| PM _{2.5} | greater than 100 | less than 100 | greater than 100 |
| SO ₂ | greater than 100 | less than 100 | greater than 100 |
| VOC | greater than 100 | less than 100 | greater than 100 |
| CO | greater than 100 | less than 100 | greater than 100 |
| NO _x | greater than 100 | less than 100 | greater than 100 |
| Single HAP | greater than 10 | less than 10 | greater than 10 |
| Total HAP | greater than 25 | less than 25 | greater than 25 |

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's

decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀, PM_{2.5}, SO₂, VOC, CO, and NO_x is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2013 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) | |
|-------------------|---------------------------------|------------------------|
| | ArcelorMittal Burns Harbor, LLC | SMS Mill Services, LLC |
| PM | 831 | - |
| PM ₁₀ | 2,698 | 3 |
| PM _{2.5} | 2,480 | 1 |
| SO ₂ | 12,189 | 0.00 |
| NO _x | 8,254 | 0.00 |
| VOC | 518 | 0.00 |
| CO | 85,045 | 0.00 |

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, because the source met the following:

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

Potential to Emit After Issuance

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

| Process/ Emission Unit | Potential To Emit of the Entire Source After Issuance of Renewal (tons/year) | | | | | | | | |
|---|---|--------------------|----------------------|-----------------|----------------|----------------|----------------|---------------|------------------------|
| | PM | PM ₁₀ * | PM _{2.5} ** | SO ₂ | NOx | VOC | CO | Total HAPs | Worst Single HAP |
| SMS Mill Services, LLC | | | | | | | | | |
| Grinding Mill | 5.10 | 5.10 | 5.10 | - | - | - | - | - | - |
| Insignificant Activities: | | | | | | | | | |
| Fuel Tank and Dispensing | - | - | - | - | - | 1.20 | - | 0.02 | - |
| Degreaser | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Gasoline Tank and Dispensing | - | - | - | - | - | 1.38 | - | 0.02 | - |
| VOC and HAP Storage Containers | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Cleaners and Solvents | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Bailing Machine | 5 | 5 | 5 | - | - | - | - | - | - |
| Fugitive emissions: | | | | | | | | | |
| Cutting Operations | 18.97 | 19.10 | 19.10 | 0.01 | 2.32 | 0.13 | 1.95 | 0.04 | 0.04 |
| Cast Break | 0.72 | 0.72 | 0.72 | - | - | - | - | - | - |
| SMS Mill Services, LLC - Total | 29.07 | 29.20 | 29.20 | 0.01 | 2.32 | 32.41 | 1.95 | 24.98 | 9.90 |
| ArcelorMittal Burns Harbor, LLC | >100 | >100 | >100 | >100 | >100 | >100 | >100 | >25 | >10 |
| Total PTE of Entire Source | >100 | >100 | >100 | >100 | >100 | >100 | >100 | >25 | >10 |
| Title V Major Source Thresholds | NA | 100 | 100 | 100 | 100 | 100 | 100 | 25 | 10 |
| PSD Major Source Thresholds | 100 | 100 | 100 | 100 | 100 | - | 100 | NA | NA |
| Nonattainment NSR Major Source Thresholds | - | - | - | - | 100 | 100 | - | NA | NA |
| negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} . | | | | | | | | | |

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD 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, under Emission Offset (326 IAC 2-3), because NOx and VOC, nonattainment regulated precursor pollutants, are emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon Appendix A of this document.
- (d) 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).

| |
|-----------------------------------|
| Federal Rule Applicability |
|-----------------------------------|

- (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.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each existing emission unit and specified pollutant subject to CAM:

| Emission Unit / Pollutant | Control Device Used | Emission Limitation (Y/N) | Uncontrolled PTE (tons/year) | Controlled PTE (tons/year) | Major Source Threshold (tons/year) | CAM Applicable (Y/N) | Large Unit (Y/N) |
|----------------------------------|----------------------------|----------------------------------|-------------------------------------|-----------------------------------|---|-----------------------------|-------------------------|
| Grinding Mill/PM | Baghouse | Y | 57.94 | 0.579 | 100 | N | N |

Based on this evaluation, the requirements of 40 CFR Part 64 (CAM) are not applicable to the one (1) grinding mill for PM.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

| |
|---|
| State Rule Applicability - Entire Source |
|---|

326 IAC 2-2 (PSD)

SMS Mill Services, LLC is co-located at a major source for PSD. ArcelorMittal Burns Harbor LLC has been a major source since inception of the PSD. Therefore, all modifications made after the promulgation of the PSD Rules (326 IAC 2-2) on August 7, 1977 were evaluated under the PSD. SMS Mill Services has a minor limit under PSD for the steel vertical grinding mill constructed in 1989. SMS Mill Services, LLC has never gone through major PSD review.

326 IAC 2-3 (Emission OffSet)

SMS Mill Services, LLC is co-located at a major source for EO for ozone. With the exception of 2010 and 2011 Porter County has been designated as nonattainment for ozone. SMS Mill Services, LLC does not have any minor limits under EO and has never gone through major EO review.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Porter County and its emissions of VOC and/or NOx are greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2016, and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certification that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2(1)

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

SMS Mill Services, LLC is not subject to 326 IAC 6-5 fugitive particulate matter emission limitations because the fugitive emissions are less than 25 tons per year. Though the combined fugitive emissions with ArcelorMittal Burns Harbor LLC, are more than 25 tons per year, ArcelorMittal is specifically subject to the requirements of 326 IAC 6-6, it is therefore, exempt from the requirements of 326 IAC 6-5 and SMS Mill Services, LLC is not specifically listed under 326 IAC 6-6.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

326 IAC 6-6-4 (Bethlehem Steel Corporation specific source and facility TSP emission limits)

SMS Mill Services, LLC does not operate any of the specifically listed equipment under 326 IAC 6-6-4, therefore the emission unit is exempted under this rule.

State Rule Applicability – Steel Vertical Grinding Mill

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

Pursuant to 326 IAC 6-3-2(e) the particulate emissions from the vertical grinding mill EU002-07 shall not exceed 19.18 pounds per hour when operating at a process weight rate of ten (10) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

The baghouses shall be in operation at all times the vertical grinding mill is in operation, in order to comply with this limit.

State Rule Applicability - Degreaser and Cleaners and Solvents

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

Pursuant to 326 IAC 8-3-1(c)(2)(A)(i) the degreasing operations are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because they are cold cleaner degreasers without remote solvent reservoirs located in Porter county and this rule also applies to cold cleaner type degreasing facilities constructed after July 1, 1990.

326 IAC 8-3-8 (Material Requirements for Cold Cleaning Degreasers)

This source is subject to the provisions of 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers) because the source is a user of solvents for use in cold cleaning degreasers. The source shall meet the material requirements for cold cleaning degreasers specified in 326 IAC 8-3-8(c) and record keeping requirements specified in 326 IAC 8-3-8(d) of this rule.

326 IAC 8-7 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties

Pursuant to 326 IAC 8-7-2 the source is located in Porter County, has the potential to emit 25 tons per year of VOC, and operates a degreasing operation with potential VOC emissions. However, pursuant to 326 IAC 8-7-2(a)(3)(B) the degreasing operation is exempt because the degreaser is covered by the cold cleaning degreaser rule. Pursuant to 326 IAC 8-7-2(a)(3)(P) clean up solvents are an exception to the affected facilities requirements. Therefore the cleaner and solvent operation is exempt.

State Rule Applicability - Fuel Tank

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

Pursuant to 326 IAC 8-9-1 (Applicability), this rule applies to stationary vessels used to store volatile organic liquid (VOL) at SMS Mill Services, LLC, because they are located in Porter County.

Pursuant to 326 IAC 8-9-1(b), stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.

326 IAC 8-7 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties

Pursuant to 326 IAC 8-7-2 the source is located in Porter County, has the potential to emit 25 tons per year of VOC, and operates a fuel tank(s) with potential VOC emissions. However, pursuant to 326 IAC 8-7-2(a)(3)(Q) volatile organic liquid storage is exempt.

State Rule Applicability - Torch Cutting

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

The thermal cutting emission units have been determined to be fugitive emissions, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule.

- (a) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the EU 002-06a shall not exceed 47.77 pounds per hour when operating at a maximum process weight of 70 tons per hour.
- (b) Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emissions from the EU 002-06b shall not exceed 47.05 pounds per hour when operating at a maximum process weight of 65 tons per hour.

The pounds per hour limitations were calculated using the following equation:

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

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

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

State Rule Applicability - Gasoline Tank

326 IAC 8-4 Petroleum Sources

Pursuant to 326 IAC 8-4-1(a)(7) the source is located in Porter County and operates gasoline storage tank(s) that dispense fuel. However, the following requirements are not met:

- (1) Pursuant to 326 IAC 8-4-3(a) the storage tank has capacities less than 39,000 gallons. Therefore, the requirements of 326 IAC 8-4-3 do not apply.
- (2) Pursuant to 326 IAC 8-4-1(d) the storage tank dispenses less than 10,000 gallons per month. Therefore, the requirements of 326 IAC 8-4-6 do not apply.

326 IAC 8-7 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties

Pursuant to 326 IAC 8-7-2 the source is located in Porter County, has the potential to emit 25 tons per year of VOC, and operates a gasoline tank with potential VOC emissions. However, pursuant to 326 IAC 8-7-2(b) the gasoline tank is exempt.

State Rule Applicability - VOC and HAP Storage Containers

326 IAC 8-7 Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties

Pursuant to 326 IAC 8-7-2 the source is located in Porter County, has the potential to emit 25 tons per year of VOC, and operates a VOC and HAP storage containers with potential VOC emissions. However, pursuant to 326 IAC 8-7-2(a)(3)(Q) the volatile organic liquid storage is exempt.

State Rule Applicability - Cast Break and Scrap Baling Machine

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

The cast break and scrap baling machine have been determined to be fugitive emissions, IDEM, OAQ does apply the requirements of 326 IAC 6-3 to sources of fugitive emissions that are manufacturing processes and that are not otherwise exempt from the rule.

Pursuant to 326 IAC 6-3-1(b)(14), the potential particulate emissions from the cast break or scrap baling machine are less than 0.551 pounds per hour. Therefore, this emission unit is exempt from the requirements of 326 IAC 6-3.

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.

(a) The compliance monitoring requirements applicable to this source are as follows:

| Control | Parameter | Frequency | Range | Excursions and Exceedances |
|------------------------|---------------------|-----------|-----------------------------|----------------------------|
| Baghouses C002-9201 | Visible Emissions | Daily | Normal-Abnormal | Response Steps |
| | Water Pressure Drop | Daily | 0.2 and 6.0 inches of water | Response Steps |

These monitoring conditions are necessary because the two (2) baghouses for the vertical grinding mill must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emissions Limitations for Manufacturing Source) and 326 IAC 2-2 (PSD).

(b) The compliance determination requirements applicable to EU002-07 is as follows:

| Emission Unit | Pollutant | Time frame | Control Device | Frequency of Testing | Limits or Requirement |
|---------------------------------------|-----------|--|-----------------------------|----------------------|-----------------------|
| Steel vertical grinding mill EU002-07 | PM | Not later than 180 days after the issuance date of this permit, Permit No T127-36765-00076 | two (2) baghouses C002-9201 | Every 5 years | 326 IAC 2-2 |

Testing is necessary to verify the level of control efficiency and ability to comply with the PSD minor limit (326 IAC 2-2). As stated in Permit No. 127-29707-00076, issued on October 26, 2011 that the control efficiency need to comply with the PSD limit shall not be less than 91.2%. Therefore, with this high efficiency, testing condition will be necessary to verify the level of compliance with the PSD limit.

Recommendation

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

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

An application for the purposes of this review was received on January 27, 2016.

Conclusion

The operation of this on-site scrap metal reclamation process shall be subject to the conditions of the attached Part 70 Operating Permit Renewal No. 127-36765-00076.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Monica Dick 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) 234-1243 or toll free at 1-800-451-6027 extension 4-1243.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Summary of Emissions**

Company Name: SMS Mill Services, LLC
Address City IN Zip: 250 West US Highway 12, Burns Harbor, IN 46304
Permit No.: T127-36765-00076
Reviewer: Monica Dick

| Uncontrolled Potential Emissions | | | | | | | | | |
|----------------------------------|--------------|--------------|--------------|-------------|-------------|--------------|-------------|--------------|-------------|
| Emission Units | PM | PM-10 | PM-2.5 | SO2 | NOx | VOC | CO | Total HAPs | Single HAP |
| | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) |
| Grinding Mill | 57.94 | 57.94 | 57.94 | - | - | - | - | - | - |
| Insignificant Activities: | | | | | | | | | |
| Fuel Tank and Dispensing | - | - | - | - | - | 1.20 | - | 0.02 | - |
| Degreaser | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Gasoline Tank and Dispensing | - | - | - | - | - | 1.38 | - | 0.02 | - |
| VOC and HAP Storage Containers | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Cleaners and Solvents | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Bailing Machine | 5 | 5 | 5 | - | - | - | - | - | - |
| Fugitive emissions: | | | | | | | | | |
| Cutting Operations | 18.97 | 19.10 | 19.10 | 0.01 | 2.32 | 0.13 | 1.95 | 0.04 | - |
| Cast Break | 0.72 | 0.72 | 0.72 | - | - | - | - | - | - |
| Total | 82.63 | 82.76 | 82.76 | 0.01 | 2.32 | 32.41 | 1.95 | 24.98 | 9.90 |

The degreaser, VOC and HAP storage containers, and cleaning and solvent are maintenance activities the VOC and HAP emissions for each unit are insignificant and are listed in the summary of emission tables as 10 tons per year of VOC and a combined emission of less than 10 tons per year single HAP and 25 tons per year total HAPs for the source.

The scrap bailing machining is a maintenance activity and particulate emissions are insignificant and are listed in the summary of emissions table as 5 tons per year of PM, PM10, and PM2.5.

| Limited Potential Emissions | | | | | | | | | |
|--------------------------------|--------------|--------------|--------------|-------------|-------------|--------------|-------------|--------------|-----------------------|
| Emission Units | PM | PM-10 | PM-2.5 | SO2 | NOx | VOC | CO | Total HAPs | Single HAP |
| | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (tons/yr) | (Hexane) (tons/yr) |
| Grinding Mill | 5.10 | 5.10 | 5.10 | - | - | - | - | - | - |
| Insignificant Activities: | | | | | | | | | |
| Fuel Tank | - | - | - | - | - | 1.20 | - | 0.02 | - |
| Degreaser | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Gasoline Tank | - | - | - | - | - | 1.38 | - | 0.02 | - |
| VOC and HAP Storage Containers | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Cleaners and Solvents | - | - | - | - | - | 9.9 | - | 8.3 | 3.3 |
| Bailing Machine | 5 | 5 | 5 | - | - | - | - | - | - |
| Fugitive emissions: | | | | | | | | | |
| Cutting Operations | 18.97 | 19.10 | 19.10 | 0.01 | 2.32 | 0.13 | 1.95 | 0.04 | - |
| Cast Break | 0.72 | 0.72 | 0.72 | - | - | - | - | - | - |
| Total | 29.07 | 29.20 | 29.20 | 0.01 | 2.32 | 32.41 | 1.95 | 24.98 | 9.90 |

**Emission Calculations
Particulate Matter Emission Sources**

Company Name: SMS Mill Services, LLC
Address City IN Zip: 250 West US Highway 12, Burns Harbor, IN 46304
Permit No.: T127-36765-00076
Reviewer: Monica Dick

| Unit ID/Control Device | Control Efficiency (%) | Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.) | Gas or Air Flow Rate (acfm.) | PM Emission Rate | | | |
|------------------------|------------------------|---|------------------------------|-------------------------|---------------------------|------------------------|--------------------------|
| | | | | Before Controls (lb/hr) | Before Controls (tons/yr) | After Controls (lb/hr) | After Controls (tons/yr) |
| EU002-07 | 99.00% | 0.001 | 10,600 | 13.23 | 57.94 | 0.132 | 0.579 |

PM=PM10=PM2.5

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (cub. ft./min.) (60 min/hr) (lb/7000 grains)
 Emission Rate in tons/yr (after controls) = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
 Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
 Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

| Unit ID/Control Device | Maximum Process Throughput Rate (lb/hr) | Allowable Emission Rate (lb/hr) |
|------------------------|---|---------------------------------|
| EU002-07 | 20,000 | 19.177 |

326 IAC 6-3-2 Allowable Emission Rate for Processes <30 tons/hr, Allowable (lb/hr) = 4.1 x Process Weight (tons/hr) ^ 0.67

326 IAC 2-2 COMPLIANCE

| 326 IAC 2-2 limit (tons/yr) | Allowable Emission Rate (lb/hr) |
|-----------------------------|---------------------------------|
| 5.10 | 1.16 |

Methodology

326 IAC 2-2 Allowable Emission Rate (lb/hr) = 326 IAC 2-2 emission limit (tons/yr) * 2000 lbs/1 ton * yr/8760hrs
 An emission rate of < 5.37 lbs/hr is necessary in order to limit particulate (PM) emissions to < 25 tpy and to make this modification minor under 326 IAC 2-2 (PSD).

| Uncontrolled PM Emission Rate (PM) (lb/hr) | Required Control Efficiency | Achieved Emission Rate (lb/hr) |
|--|-----------------------------|--------------------------------|
| 13.23 | 91.2% | 1.16 |

Methodology

In order to comply with the pound per hour limit, the Grinding Mill is required to use controls at all times and to maintain a control efficiency of not less than 91.2%, as shown below:

Required Control Efficiency = 1 - allowable emission rate (lb/hr)/uncontrolled PM emission rate (lb/hr)
 Achieved Emission Rate = uncontrolled PM emission rate (lb/hr)*(1-required control efficiency)

**Appendix A: Emissions Summary
Gasoline and Petroleum Fuel Transfer and Dispensing Operation
Volatile Organic Compounds and Hazardous Air Pollutants (HAPs)**

Company Name: SMS Mill Services, LLC
Address City IN Zip: 250 West US Highway 12, Burns Harbor, IN 46304
Permit No.: T127-36765-00076
Reviewer: Monica Dick

To calculate evaporative emissions from the gasoline dispensing fuel transfer and dispensing operation emission factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids were used. The total potential emission of VOC is as follows:

Gasoline Throughput = kgal/yr Petroleum Fuel Throughput = kgal/yr

| Gasoline | | | Petroleum Fuel | | |
|---|--|----------------------|---|--|----------------------|
| Emission Source | Emission Factor (lb/kgal of throughput)* | PTE of VOC (tons/yr) | Emission Source | Emission Factor (lb/kgal of throughput)* | PTE of VOC (tons/yr) |
| Filling storage tank (splash filling) | 11.50 | 0.66 | Filling storage tank (splash filling) | 5.00 | 1.20 |
| Tank breathing and emptying | 1.00 | 0.06 | Tank breathing and emptying | NA | NA |
| Vehicle refueling (displaced losses - uncontrolled) | 11.00 | 0.63 | Vehicle refueling (displaced losses - uncontrolled) | NA | NA |
| Spillage | 0.70 | 0.04 | Spillage | NA | NA |
| Total | | 1.38 | Total | | 1.20 |

NA = VOC loss is negligible.

Methodology

The gasoline throughput was provided by the source.

*Emission Factors from AP-42 Chapter 5.2 Transportation And Marketing Of Petroleum Liquids (dated 6/08), Table 5.2-7

Gasoline Throughput (kgal/yr) = [Gasoline Throughput (gallons/day)] * [365 days/yr] * [kgal/1000 gal]

PTE of VOC (tons/yr) = [Gasoline Throughput (kgal/yr)] * [Emission Factor (lb/kgal)] * [ton/2000 lb]

Hazardous Air Pollutants (HAPs)

| Volatile Organic HAP | CAS# | Hazardous Air Pollutant (HAP) Content (vapor mass fraction)** | PTE of HAP (tons/yr) |
|----------------------|----------|---|----------------------|
| Benzene | 71-43-2 | 0.37% | 5.1E-03 |
| n-Hexane | 110-54-3 | 0.34% | 4.7E-03 |
| Toluene | 108-88-3 | 0.40% | 5.5E-03 |
| m-Xylenes | 108-38-3 | 0.11% | 1.5E-03 |

Total PTE of HAPs (tons/yr)

1.7E-02

PTE of Worst Single HAP (tons/yr)

5.5E-03

(Toluene)

HAP emission for petroleum fuel are negligible.

Methodology

**Source: US EPA TANKS Version 4.09 program

PTE of Total HAPs (tons/yr) = [Total HAP Content (% by weight)] * [PTE of VOC (tons/yr)]

PTE of HAP (tons/yr) = [Hazardous Air Pollutant (HAP) Content (vapor mass fraction)] * [PTE of VOC (tons/yr)]

Abbreviations

VOC = Volatile Organic Compounds HAP = Hazardous Air Pollutant

PTE = Potential to Emit

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Thermal Cutting, Emission unit EU 002-06a and EU 002-06b, Natural Gas Combustion Only

Company Name: SMS Mill Services, LLC
Address City IN Zip: 250 West US Highway 12, Burns Harbor, IN 46304
Permit No.: T127-36765-00076
Reviewer: Monica Dick

| | | |
|---------------------------------|-----------------------|---------------------------------|
| Heat Input Capacity MMBtu/hr | HHV MMBtu MMscf | Potential Throughput MMCF/yr |
| 5.4 | 1020 | 46.4 |

| Emission Factor in lb/MMCF | Pollutant | | | | | | |
|-------------------------------|-----------|-------|---------------|------|-------------|------|------|
| | PM* | PM10* | direct PM2.5* | SO2 | NOx | VOC | CO |
| | 1.9 | 7.6 | 7.6 | 0.6 | 100 | 5.5 | 84 |
| Potential Emission in tons/yr | 0.04 | 0.18 | 0.18 | 0.01 | **see below | 0.13 | 1.95 |

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
 PM2.5 emission factor is filterable and condensable PM2.5 combined.
 **Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
 MMBtu = 1,000,000 Btu
 MMCF = 1,000,000 Cubic Feet of Gas
 Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03
 Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu
 Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

| | HAPs - Organics | | | | | Total - Organics |
|-------------------------------|-----------------|-----------------|--------------|---------|---------|------------------|
| | Benzene | Dichlorobenzene | Formaldehyde | Hexane | Toluene | |
| Emission Factor in lb/MMcf | 2.1E-03 | 1.2E-03 | 7.5E-02 | 1.8E+00 | 3.4E-03 | |
| Potential Emission in tons/yr | 4.9E-05 | 2.8E-05 | 1.7E-03 | 0.04 | 7.9E-05 | 0.04 |

| | HAPs - Metals | | | | | Total - Metals |
|-------------------------------|---------------|---------|----------|-----------|---------|----------------|
| | Lead | Cadmium | Chromium | Manganese | Nickel | |
| Emission Factor in lb/MMcf | 5.0E-04 | 1.1E-03 | 1.4E-03 | 3.8E-04 | 2.1E-03 | |
| Potential Emission in tons/yr | 1.2E-05 | 2.6E-05 | 3.2E-05 | 8.8E-06 | 4.9E-05 | 1.3E-04 |

Methodology is the same as above.
 The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

| | |
|-------------------|-------------|
| Total HAPs | 0.04 |
| Worst HAP | 0.04 |

**Appendix A: Emissions Calculations
Insignificant Activities**

Thermal Cutting, Emission unit EU 002-06a and EU 002-06b

Company Name: SMS Mill Services, LLC
Address City IN Zip: 250 West US Highway 12, Burns Harbor, IN 46304
Permit No.: T127-36765-00076
Reviewer: Monica Dick

| Torch cut materials | |
|---------------------|------------|
| EU 002-06a | EU 002-06b |
| Tons/hr | Tons/hr |
| 70 | 65 |

| Emission Factor in lb/ton | Pollutant | | | EU 002-06a | EU 002-06b | EU 002-06a | EU 002-06b |
|-------------------------------|-----------|-------|--------------|---------------------|---------------------|--------------------------|-------------------|
| | PM | PM10 | direct PM2.5 | PM Emission (lb/hr) | PM Emission (lb/hr) | PWR Limit (lb/hr) | PWR Limit (lb/hr) |
| | 0.032 | 0.032 | 0.032 | 0.032 | 0.032 | E=55.0 P ^{0.11} | 40 |
| Potential Emission in tons/yr | 18.92 | 18.92 | 18.92 | 2.24 | 2.08 | 47.77 | 47.05 |

Each torch cuts five (5) tons of steel per hour.

Material Usage/Process Information

EU 002-06a

This equipment consists of seven (7) C-67 and seven (7) C-63 torches.

EU 002-06b

This equipment consists of seven (7) C-66 and six (6) PM300 torches.

| lb/ton EF | Each Torch PM Emission (lb/hr) | Each Torch PWR Limit (lb/hr) |
|-----------|--------------------------------|------------------------------|
| 0.032 | E=4.10 P ^{0.67} | |
| 0.16 | | 12.05 |

Methodology

PM Emission factor from AP 42 , Chapter 12.5.1, Table 12.5.1-1, SCC #3-04-003-60.

Potential Throughput (tons/yr) = Torch cut materials (tons/hr) * EF (lb/ton) x 8,760 hrs/yr x ton/2000lbs

Cast Break Operation, identified as EU 002-08 and Scrap Bailing Machine, identified as 9207

| | Maximum Capacity (ton/month) | Amount of metal scrap cut (% by wt.) | PM Emission (%) | PM Emission (ton/year) | Maximum Capacity (ton/hr) | PM Emission (lb/hr) |
|-----------------------|------------------------------|--------------------------------------|-----------------|------------------------|---------------------------|---------------------|
| Cast Break Operations | 12,000 | 10% | 0.005% | 0.72 | 400 | 0.002 |
| Scrap Bailing Machine | 15,000 | - | 0.033% | 5 | 500 | 0.167 |

PM=PM10=PM2.5

The scrap bailing machining is a maintenance activity and particulate emissions are insignificant and are listed in the summary of emissions table as 5 tons per year of PM, PM10, and PM2.5.



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 13, 2016

Rot Corrigan
SMS Mill Services
250 W US Highway 12
Burns Harbor, IN 46304

Re: Public Notice
SMS Mill Services
Permit Level: Title V - Renewal Administrative

Permit

Permit Number: 127 - 36765 - 00076

Dear Rot Corrigan:

Enclosed is a copy of your draft Title V - Renewal Administrative Permit, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Chesterton Tribune in Chesterton, Indiana publish the abbreviated version of the public notice no later than July 15, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the Westchester Public Library, 200 W Indiana Ave in Chesterton IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Monica Dick, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-1243 or dial (317) 234-1243.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Carol S. Comer
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

July 13, 2016

Chesterton Tribune
Attn: Classifieds
P.O. Box 919
Chesterton, Indiana 46304

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for SMS Mill Services, Porter County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than July 18, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: Title V - Renewal Administrative Permit
Permit Number: 127 - 36765 - 00076

Enclosure
PN Newspaper.dot 6/13/2013



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Michael R. Pence
Governor

Carol S. Comer
Commissioner

July 13, 2016

To: Westchester Public Library 200 W Indiana Ave Chesterton IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: SMS Mill Services
Permit Number: 127 - 36765 - 00076

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

Notice of Public Comment

July 13, 2016
SMS Mill Services
127 - 36765 - 00076

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016

Mail Code 61-53

| | | | | |
|----------------------------|---|---|--|--|
| IDEM Staff | LPOGOST 7/13/2016 SMS Mill Services, LLC - contractor of ArcelorMittal 127 - 36765 - 00076 draft | | 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 | | Rot Corrigan SMS Mill Services, LLC - contractor of ArcelorMitt 250 W US Highway 12 Burns Harbor IN 46304 (Source CAATS) | | | | | | | | | | |
| 2 | | Kevin Crary President SMS Mill Services, LLC - contractor of ArcelorMitt 250 W US Highway 12 Burns Harbor IN 46304 (RO CAATS) | | | | | | | | | | |
| 3 | | Westchester Public Library 200 W Indiana Ave Chesterton IN 46304-3122 (Library) | | | | | | | | | | |
| 4 | | Porter County Board of Commissioners 155 Indiana Ave, Ste 205 Valparaiso IN 46383 (Local Official) | | | | | | | | | | |
| 5 | | Porter County Health Department 155 Indiana Ave, Suite 104 Valparaiso IN 46383-5502 (Health Department) | | | | | | | | | | |
| 6 | | Shawn Sobocinski 1814 Laporte Street Portage IN 46368-1217 (Affected Party) | | | | | | | | | | |
| 7 | | Mr. Ed Dybel 2440 Schrage Avenue Whiting IN 46394 (Affected Party) | | | | | | | | | | |
| 8 | | Mr. Joseph Virgil 128 Kinsale Avenue Valparaiso IN 46385 (Affected Party) | | | | | | | | | | |
| 9 | | Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 (Affected Party) | | | | | | | | | | |
| 10 | | Ms. Kathy Luther Northern Regional Planning Commission 6100 Southport Rd Portage IN 46368 (Affected Party) | | | | | | | | | | |
| 11 | | Burns Harbor Town Council 1240 N. Boo Rd Burns Harbor IN 46304 (Local Official) | | | | | | | | | | |
| 12 | | Eric & Sharon Haussman 57 Shore Drive Ogden Dunes IN 46368 (Affected Party) | | | | | | | | | | |
| 13 | | Mrs. Kathy Moore Keramida Environmental, Inc. 401 North College Indianapolis IN 46202 (Consultant) | | | | | | | | | | |
| 14 | | Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party) | | | | | | | | | | |
| 15 | | Responsible Official Arcelor Mittal 250 W. Highway 12 Burns Harbor IN 46304 (Source – addl contact) | | | | | | | | | | |

| | | | |
|---|--|--|--|
| 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. |
|---|--|--|--|

Mail Code 61-53

| | | | | |
|----------------------------|---|---|---|--|
| IDEM Staff | LPOGOST 7/13/2016 SMS Mill Services, LLC - contractor of ArcelorMittal (001) 36765 (draft/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 | | Mark PO Box 85 Beverly Shores IN 46301-0085 (Affected Party) | | | | | | | | | | |
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| 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. |
|---|--|--|--|