INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
*We make Indiana a cleaner, healthier place to live.*

*Joseph E. Kernan*
Governor

*Lori F. Kaplan*
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

December 7, 2004

TO: Interested Parties / Applicant

RE: ISG Indiana Harbor, Inc. / 089-7099-00318

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

# Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:
(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:
(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and



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(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

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

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

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNTVOP.dot 9/16/03

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# PART 70 OPERATING PERMIT
# OFFICE OF AIR QUALITY

## ISG-Indiana Harbor, Inc.
## 3001 Dickey Road
## East Chicago, Indiana 46312

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR 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 70.6, IC 13-15 and IC 13-17.

| Operation Permit No.: T089-7099-00318 | |
|---|---|
| Issued by: Original signed by<br>Janet G. McCabe, Assistant Commissioner<br>Office of Air Quality | Issuance Date: December 7, 2004<br><br>Expiration Date: December 7, 2009 |

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D.11.4 Reporting Requirements

**Certification……**
**Emergency Occurrence Report……..**
**Semi-Annual Natural Gas Fired Boiler Certification……**
**Quarterly Deviation and Compliance Monitoring Report……**

## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary integrated steel mill and finishing facility

| | |
|---|---|
| Responsible Official: | General Manager,<br>ISG Indiana Harbor Inc. |
| Source Address: | 3001 Dickey Road, East Chicago 46312 |
| Mailing Address: | 3250 Interstate Drive, 2nd Floor, Richfield, OH 44286-9000 |
| General Source Phone Number: | (219) 391-2571 |
| SIC Code: | 3312 |
| County Location: | Lake County |
| Source Location Status: | Nonattainment for $SO_2$, 1-hour and 8-hour ozone standard<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source, under PSD and Emission Offset Rules;<br>Major Source, Section 112 of the Clean Air Act<br>1 of 28 Source Categories under PSD and Emission Offset Rules |

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

ISG-Indiana Harbor Inc. is an integrated steel mill consisting of a source with on-site contractors:

(a) ISG-Indiana Harbor Inc. (Plant ID 089-00318), the primary operation, is located at, 3001 Dickey Road, East Chicago, Indiana and

(b) Oil Tech, Inc (Plant ID 089-00375), the on-site contractor (a used oil recycling facility), is located at 3001 Dickey Road, East Chicago, Indiana;

(c) International Mill Service (Plant ID 089-00353), the on-site contractor (a steel slab scarfer) is located 3001 Dickey Road, East Chicago, Indiana;

(d) Edward Levy (Plant ID 089-00339), the on-site contractor (a slag processing facility), is located at 3001 Dickey Road, East Chicago, Indiana;

(e) Ironside Energy, LLC (Plant ID 089-00448), the on-site contractor (an industrial steam and electric power cogeneration plant), is located at 3001 Dickey Road, East Chicago, Indiana

(f) Heckett Multiserv (Plant ID 089-00341), the on-site contractor (a slag and kish processing plant), is located at East Chicago, Indiana;

IDEM has determined that ISG-Indiana Harbor Inc. and each of the on-site contractors are under the common control of ISG-Indiana Harbor Inc. These plants are considered one source due to contractual control. Therefore, the term “source” in the Part 70 documents refers to both ISG-Indiana Harbor Inc. and the on-site contractors as one source.

Separate Part 70 permits will be issued to ISG-Indiana Harbor Inc. and each on-site contractor, solely for administrative purposes.

| Company Name | TV Permit Number |
|---|---|
| ISG-Indiana Harbor, Inc. | 089-7099-00318 |
| Oil Technology | 089-7517-00375 |
| International Mill Service | 089-7562-00353 |
| Edward Levy | 089-6260-00339 |
| Ironside Energy | 089-11557-00448 |
| Heckett Multiserv | 089-7066-00341 |

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

ISG-Indiana Harbor Inc. consists of the following permitted emission units and pollution control devices:

**(a) Two (2) Blast Furnaces, designated as Blast Furnace No. 3 and Blast Furnace No. 4, comprised of the following facilities, process equipment, and operational practices:**

(1) No. 3 Blast Furnace, with a maximum capacity of 4,555,200 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower, with excess gas exhausting through a flare at stack (S1E); installed in 1953.

(2) No. 3 Blast Furnace Stoves, designated as stoves 31, 32, and 33, exhausting to the combustion stack (S1A) with a heat input rate of 441 MMBtu/hr and installed in 1953

(3) No. 3 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 3 Blast Furnace Casthouse Roof Monitor (V1A);

(4) No. 4 Blast Furnace, with a maximum capacity of 5,490,836 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower with excess gas exhausting through a flare at stack-(S1D); installed in 1967

(5) No. 4 Blast Furnace Stoves, designated as stoves 41, 42, and 43, exhausting to the combustion stack (S1C) with a heat input rate of 486 MMBtu/hr and installed in 1967

(6) No. 4 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 4 Blast Furnace Casthouse Roof Monitor (V1B)

(7) No. 4 Blast Furnace Casthouse Baghouse used to control emissions from the casthouse with an airflow rate of 147,000 acfm exhausting at stack (S1B) when operating one (1) fan. No. 4 Blast Furnace Casthouse Baghouse has an air flow rate of 240,000 acfm when operating two (2) fans.

(8) Miscellaneous equipment for handling of raw materials, including but not limited to, coke, iron ore pellets, limestone, slag and sinter.

**(b) One (1) Sinter Plant with a maximum raw material usage rate of 2,592,782 tons per year and a maximum annual production capacity of 2,119,920 tons of sinter per year,**

**comprised of the following facilities, fugitive sources, process equipment, and operational practices: (Installed in 1958)**

(1) Raw material handling area consisting of material feeders (storage bins), conveyors, a pug mill and hearth layer returns from screening that combines these raw materials to create a uniform mixed burden that is deposited on the sinter strand.

(2) One (1) natural gas fired ignition furnace used to ignite the surface of the mixed burden deposited on the sinter strand.

(3) One (1) sinter plant main windbox, with twenty-one (21) vacuum chambers and emissions controlled by drop- out boxes, multi-cyclones (6 units), settling chamber and a wet venturi scrubber (containing chevrons) having a flow rate of 335,000 acfm, exhausting to stack-(S2A)

(4) One (1) sinter plant discharge end (breaker), with a hood to capture light dust and controlled by a wet Venturi scrubber having a flow rate of 100,400 acfm, exhausting to stack (S2B)

(5) One (1) Sinter Cooler and sinter product screening station

**(c) Basic Oxygen Furnace (BOF) Shop, comprised of the following facilities, process equipment, and operational practices:**

(1) One (1) Hot Metal Reladle/Desulf Complex consisting of two (2) reladle stations, two (2) desulfurization stations and two (2) slag skimming stations, installed in 1982, having a maximum capacity of 5,630,208 tons per year of hot metal and sulfur scavenger. Emissions from all stations are controlled by a baghouse, designated as Baghouse No. 1 with captured emissions exhausting to stack (S3B) and uncaptured/fugitive emissions exhausting through a roof monitor (V3B)

(2) One (1) Basic Oxygen Furnace (BOF) Complex, consisting of two (2) basic oxygen furnaces, designated as No. 1 and No. 2 Furnace, installed in 1968, having a combined maximum capacity of 7,456,512 tons of hot metal, flux, alloys, and scrap per year. Emissions from furnace operations such as charging, oxygen blowing and tapping are controlled by an electrostatic precipitator, with captured emissions exhausting to stack S3A and uncaptured/fugitive emissions exhausting through a roof monitor at vent V3A;

(3) One (1) Ladle Metallurgical Facility (LMF), installed in 1988, consisting of (2) heating stations, having a combined maximum capacity of 5,606,400 tons of hot metal, flux and alloys per year. Emissions from LMF operations such as argon stirring, heating, and alloy addition, are controlled by a baghouse, designated as Baghouse No. 5 (LMF), with captured emissions exhausting to stack (S3C) and uncaptured/fugitive emissions exhausting through a roof monitor at vent (V3C)

(4) One (1) Vacuum Degassing Facility (decarbonization), installed in 1988, with carbon monoxide (CO) emissions controlled by an integral CO scrubber and exhausting to the flare at stack (S3D)

(5) One (1) Continuous Casting Complex consisting of two (2) single–strand slab casting machines, each with its own ladle turrent, tundish and mold. Molten steel from the LMF is directed into the turrent than cooled in the mold to begin the solidification process. The steel continues to solidify as it passes through the water spray cooling system to produce slabs that are finally cut to length using an acetylene torch-cutting machine. Emissions from water-cooling are directed to stacks (S3E/F).

(6) Lime handling operations including trailer unloading and lime handling from silos with emissions captured by single compartment, 16 bag filter vents;

(7) Miscellaneous dust removal process consisting of recovered BOF ESP dust, baghouse dust, handling and conditioning equipment, silos and pug mill; (fugitives)

(8) Miscellaneous natural gas combustion consisting of ladle preheat, ladle drying, space heaters, tundish preheat and drying, tundish nozzle preheat, ladle shroud preheat, and slab torch cutting; and

(9) Miscellaneous material handling.

**(d) 84 Inch Hot Strip Mill, comprising the following facilities, process equipment, and operational practices:**

(1) Three (3) Reheat Furnaces identified as Nos. 1, 2 and 3, installed in 1968, having a heat input rate of 427 MMBtus per hour each.

(A) No. 1 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4A.

(B) No. 2 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4B.

(C) No. 3 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4C.

(2) One (1) Hot Rolling Mill, where steel slabs from the reheat furnaces are converted to hot bands (steel coils). The mill consists of scale breakers, six (6) roughing stands, a crop shear, seven (7) finishing stands, a cooling table and three (3) downcoilers. The mill fugitive emissions from these processes vent inside the building (V4A).

(3) One (1), two (2) stand temper mill.

(4) Twenty-eight (28) natural gas space heaters having a combined heat input rate of 84 MMBtu/hr.

**(e) One (1) Sheet Mill Finishing operation, designated as No. 2 Sheet Mill, having a maximum capacity of 1,404,929 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) No. 1 Galvanizing Line (installed in 1959) consisting of:

(A) Flame Furnace having heat input rate of 18 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(B) Galvanize furnace having a heat input rate of 37 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(D) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(E) Hot air dryer exhausting to No. 2 Sheet Mill shop

(2) No. 2 Galvanizing Line (installed in 1988) consisting of:

(A) Flame Furnace having heat input rate of 150 MMBtu/hr with uncontrolled emissions exhausting through stack S5B.

(B) Galvanize furnace having a heat input rate of 54 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) One (1) natural gas fired Edge Flame Burner on line No. 2, with uncontrolled emissions venting into the No. 2 Sheet Mill shop

(D) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(E) One (1) natural gas fired Selas Furnace, with uncontrolled emissions venting through vent (V5A) to No. 2 Sheet Mill shop

(F) Hot air dryers exhausting to No. 2 Sheet Mill shop

(G) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(H) Temper Mill

(3) Two (2) natural gas fired boilers designated as Boiler No. 7 and Boiler No. 8 (installed in 1955), having a combined heat input of 98 MMBtu per hour, with uncontrolled emissions exhausting to (S5C)

(4) Seven (7) space heaters (installed in 1968) having a combined heat input of 17.5 MMBtu per hour, with uncontrolled emissions exhausting to vent (V5B) to No. 2 Sheet Mill shop.

**(f) One (1) Sheet Mill Finishing operation, designated as No. 3 Sheet Mill, having a maximum capacity of 2,156,537 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) Seven (7) Single Stack Batch Annealing Furnaces (1-7) (installed in 1965), having a combined heat input of 24.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(2) Eleven (11) Four-Stack Batch Annealing Furnaces (1-11)(installed in 1966), having a combined heat input of 176 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(3) One (1) Four-Stack Batch Annealing Furnace (13) (installed in 1998) with a heat input capacity of 10 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(4) Three (3) Open Coil (Hydrogen) Annealing Furnaces (1-3), having a combined heat input of 10.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(5) One (1) Pickle Line consisting of four (4) HCI process tanks and one (1) water rinse tank (installed in 1964), with acid fumes controlled by a scrubber system (14,000 acfm) comprised of tank hoods and ductwork connected to two (2) scrubbers (in series) exhausting through scrubber stack (S6A)

(6) One (1) Shot Blaster, used to put a matte finish on the surface of reconditioned rolls. Emissions are controlled by a small baghouse exhausting through vent (V6B) outside the building.

(7) One (1) tempering operation consisting of a 2-Stand Temper Mill with fugitive emissions exhausting inside the building.

(8) One (1) steel coil cold reduction operation consisting of one (1) 5- Stand Tandem Mill where steel coil thickness is reduced to final specification, with emissions exhausting through stack (S6B)

(9) Miscellaneous activities include two (2) steel sheet edge slitters, electrostatic oiling space heating and portable heating (to prevent equipment freezing).

**(g) Utilities comprised of the following facilities, process equipment, and operational practices:**

(1) No. 5 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stacks S8C/D, installed in 1952.

(2) No. 6 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8E, installed in 1956.

(3) No. 7 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8F, installed in 1956

(4) No. 8 Boiler, with a heat input rate of 1090 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8G, installed in 1967

**(h) Shops***

(1) Machine Shop

(2) Refrigeration Shop

(3) Electrical Shop

(4) Bridge Shop

(5) Pipe Shop

(6) Line Shop

(7) Fabrication Shop

(8) Carpenter shop

(9) Paint Shop and Paint Building

(10) Mason Shop

(11) Transportation Shop

(A) Gasoline Dispensing Facility with 10,000 gallon capacity Storage Tank (T4A22) (162, 504 gal/yr throughput), installed in 1988

(B) Two (2) Diesel Fuel Storage Tanks (T-4A7 & T- 4A8) with a 10,000 gallon

storage capacity.

(12) Locomotive Shop including Railcar and Yard Storage

*the activities performed in the shops are listed in the insignificant activities

**(i) Storage Vessels: (all tanks installed before 1975)**

(1) One (1) 400,000 gallon storage tank containing #6 fuel oil (T4F24)

(2) One (1) 70,000 gallon storage tank containing #6 fuel oil (T4A1)

(3) One (1) 25,000 gallon diesel fuel storage tank (T4A13)

(4) One (1) 2,000,000 gallon storage tank containing #6 fuel oil (T4A4)

(5) One (1) 200,000 gallon storage tank containing #6 fuel oil (T4A5)

(6) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4C9)

(7) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4A C10)

(8) Three (3) 5,000 gallon bleach storage tanks (TR-05, TR-06, TR-07)

(9) Two (2) 5,000 gallon storage tanks containing hydrochloric acid (HCl) (TR-22, TR-23)

(10) One (1) 5,000 gallon storage tanks containing ethylene glycol (T4E15)

(11) Two (2) 30,000 gallon storage tank containing hydrochloric acid (HCl) (T-238, T-239)

(12) One (1) 8,000 gallon diesel fuel tank (T-4F95)

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

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

(a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]

(b) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. [326 IAC 8-9-1]

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]

(e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]

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

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

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B GENERAL CONDITIONS

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

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

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit 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.

### B.3 Enforceability [326 IAC 2-7-7]

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.4 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.5 Severability [326 IAC 2-7-5(5)]

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

### 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

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

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

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee’s control, the PMPs cannot be prepared and

maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall implement the PMPs, including any required record keeping as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
Northwest Regional Office telephone number: 219-757-0265
Northwest Regional Office Facsimile Number: 219-757-0267

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or

facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in 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]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency

Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

B.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 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-4]

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) 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.

(2) If IDEM, OAQ, upon receiving a timely and complete 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.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a

nonroad engine, as defined in 40 CFR 89.2.

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 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), (c), or (e), without a prior permit revision, if each of the following conditions is met:

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

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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 which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

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

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

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

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

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in 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.

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 and 326 IAC 2-7-10.5.

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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.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 Billing, Licensing, and Training Section (BLT)), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

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

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

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

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

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

(1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%) three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in 326 IAC 6-1-11.1(c) or material transfer for transportation within or outside the source property including, but not limited to, the following:

(i) Transfer of slag product for use by asphalt plants:

(A) From a storage pile to a front end loader; and

(B) From a front end loader to a truck.

(ii) Transfer of sinter blend for use at the sinter plant:

(A) From a storage pile to a front end loader;

(B) From a front end loader to a truck; and

(C) From a truck to the initial processing point

(iii) Transfer of coal for use at a coal processing line:

(A) From a storage pile to a front end loader; and

(B) From a front end loader to the initial hopper of a coal processing line.

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

(4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(5) Wind erosion from storage piles and exposed areas.
The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. These limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the Permittee must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.

(6) There shall be a zero (0) percent frequency of visible emission observations of a material during the in-plant transportation of material by truck or rail at any time. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in-plant transportation requirement.

(7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(9) The PM10 emissions from building vents shall not exceed twenty-two-thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(11) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

(12) PM10 emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity

(13) Fugitive particulate matter from the material processing facilities except at a crusher in which a capture system is not used shall not exceed ten percent (10%) opacity.

(14) Fugitive particulate matter from a crusher in which a capture system is not used shall not exceed fifteen percent (15%) opacity.

(15) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:

(A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.

(B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6-1-11.1(d)(9).

Material processing facilities include crushers, screens, grinders, mixers, dryers, belt conveyors, bucket elevators, bagging operations, storage bins, and truck or railroad car loading stations.

Opacity shall be determined by the procedures identified in 326 IAC 6-1-11.1(d) (1) through (9). The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on December 15, 1993 and revised on August 15, 2002.

(b) The source is subject to 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures) because it is subject to the requirements of 326 IAC 6-1-11.1 and 326 IAC 6-1-10.1(d). Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q) of this rule.

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

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

C.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
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

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

C.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)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

C.12 Continuous Compliance Plan [326 IAC 6-1-10.1(l)] [326 IAC 6-1-10.1(u)]

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

(b) Pursuant to 326 IAC 6-1-10.1(u), the Permittee shall update the CCP, as needed, retain a

copy any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP to IDEM, OAQ within thirty (30) days of the update.

(c) Pursuant to 326 IAC 6-1-10.1, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6-1-10.1.

C.13 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.

(b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.

(c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one(1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:

(1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.

(A) 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.

(B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.

(C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.

(2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.

(A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.

(C) Method 9 readings may be discontinued once a COM is online.

(D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

(3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, 326 IAC 6-1-10.1(g)(2), 40 CFR 60 and/or 40 CFR 63, Subpart FFFFF.

C.14 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.15 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading, unless State or Federal regulations provide for a different level of accuracy.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

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

C.16 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

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

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

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

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

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.18 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SSM Plan) shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirements.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that

the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.19 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 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, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

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

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

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

**(a) Two (2) Blast Furnaces, designated as Blast Furnace No. 3 and Blast Furnace No. 4, comprised of the following facilities, process equipment, and operational practices:**

(1) No. 3 Blast Furnace, with a maximum capacity of 4,555,200 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower, with excess gas exhausting through a flare at stack (S1E); installed in 1953.

(2) No. 3 Blast Furnace Stoves, designated as stoves 31, 32, and 33, exhausting to the combustion stack (S1A) with a heat input rate of 441 MMBtu/hr and installed in 1953

(3) No. 3 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 3 Blast Furnace Casthouse Roof Monitor (V1A);

(4) No. 4 Blast Furnace, with a maximum capacity of 5,490,836 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower with excess gas exhausting through a flare at stack-(S1D); installed in 1967

(5) No. 4 Blast Furnace Stoves, designated as stoves 41, 42, and 43, exhausting to the combustion stack (S1C) with a heat input rate of 486 MMBtu/hr and installed in 1967

(6) No. 4 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 4 Blast Furnace Casthouse Roof Monitor (V1B)

(7) No. 4 Blast Furnace Casthouse Baghouse used to control emissions from the casthouse with an airflow rate of 147,000 acfm exhausting at stack (S1B) when operating one (1) fan. No. 4 Blast Furnace Casthouse Baghouse has an air flow rate of 240,000 acfm when operating two (2) fans.

(8) Miscellaneous equipment for handling of raw materials, including but not limited to, coke, iron ore pellets, limestone, slag and sinter.

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

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

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [Table 4 to 40 CFR 63, Subpart FFFFF]

(a) The provisions of 40 CFR 63, Subpart A- General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected sources, No. 3 Blast Furnace and No. 4 Blast Furnace, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee must comply with these requirements on and after May 20, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Blast Furnaces [40 CFR 63.7835][40 CFR 63.7840]

D.1.2 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Emission Limitations for Blast Furnaces [40 CFR 63, Subpart FFFFF] The Permittee must comply with these requirements on and after May 22, 2006.

(a) The provisions of 40 CFR 63, Subpart FFFFF (National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing) apply to the affected sources, No. 3 Blast Furnace and No. 4 Blast Furnace. The Permittee shall comply with the applicable requirements on and after May 22, 2006.

(b) The following Blast Furnace emissions points are subject to 40 CFR 63, Subpart FFFFF:

(1) No. 3 Blast Furnace Casthouse Roof Monitor (V1A);

(2) No. 4 Blast Furnace Casthouse Roof Monitor (V1B); and

(3) No. 4 Blast Furnace Casthouse Baghouse (S1B)

(c) The definitions of 40 CFR 63, Subpart FFFFF are applicable to these processes in 40 CFR 63.7852.

(d) The Permittee shall meet each emission limitation in 40 CFR 63.7790 that applies to the No. 3 Blast Furnace Casthouse Roof Monitor (V1A), No. 4 Blast Furnace Casthouse Roof Monitor (V1B) and No. 4 Blast Furnace Casthouse Baghouse (S1B).

(e) The Permittee shall meet each operation and maintenance requirement in 40 CFR 63.7800 that applies to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment.

(f) The Permittee shall develop and implement a written startup, shutdown, and malfunction plan in accordance with 40 CFR 63.7810(c). During periods of startup, shutdown, or malfunction, the Permittee shall operate in accordance with the plan and 40 CFR 63.7835(b).

(g) The Permittee shall meet each monitoring requirement in 40 CFR 63.7830 that applies to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment.

(h) The Permittee shall meet each requirement in 40 CFR 63.7831 regarding installation, operation, and maintenance of monitors for each monitor required by 40 CFR 63, Subpart FFFFF, that applies to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment.

D.1.3 Lake County PM10 Emission Requirements [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1(d)(22), the PM10 emissions from No.3 and No. 4 Blast Furnaces shall not exceed the following:

(a) PM10 emissions from the stack serving No. 3 Blast Furnace Stoves (S1A) shall not exceed 0.027 lbs/MMBtu and 11.73 pounds per hour.

(b) PM10 emissions from the stack serving No. 4 Blast Furnace Stoves (S1C) shall not exceed 0.027 lbs/MMBtu and 12.93 pounds per hour.

Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”.

D.1.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant 326 IAC 6-1-2, No. 3 Blast Furnace Casthouse Roof Monitor (V1A), No. 4 Blast Furnace Casthouse Roof Monitor (V1B) and No. 4 Blast Furnace Casthouse Baghouse (S1B) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

D.1.5 Sulfur Dioxide (SO2) [326 IAC 7-4-1.1(c)(14)(D) and 326 IAC 7-4-1.1(c)(14)(G)]

Pursuant to 326 IAC 7-4-1.1(c)(14)(D), the SO2 emissions from the Blast Furnace operations shall be limited as follows:

(a) SO2 emissions from the stack serving No. 3 Blast Furnace Stoves (S1A) shall not exceed 0.024 lbs/MMBtu.

(b) SO2 emissions from the stack serving No. 4 Blast Furnace Stoves (S1C) shall not exceed 0.024 lbs/MMBtu.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.1.7 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Compliance Requirements for Blast Furnaces [40 CFR 63.7810(a)][40 CFR 63.7825][40 CFR 63.7826][40 CFR 63.7832] The Permittee must comply with these requirements on and after May 22, 2006.

(a) Pursuant to 40 CFR 63.7810(a), the Permittee shall be in compliance with the emission limitations and operation and maintenance requirements in Condition D.1.2 at all times, except during periods of startup, shutdown, and malfunction as defined in 40 CFR 63.2, which is incorporated by reference in 326 IAC 20-1-3.

(b) The Permittee shall demonstrate initial compliance with the emission limitations that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse in accordance with 40 CFR 63.7825.

(c) The Permittee shall demonstrate initial compliance with the operation and maintenance requirements that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse in accordance with 40 CFR 63.7826.

(d) The Permittee shall monitor and collect data to demonstrate continuous compliance with 40 CFR 63, Subpart FFFFF in accordance with 40 CFR 63.7832.

(e) The Permittee shall demonstrate continuous compliance with the emission limitations of 40 CFR 63, Subpart FFFFF that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment in accordance with 40 CFR 63.7833.

(f) The Permittee shall demonstrate continuous compliance with the operation and maintenance requirements of 40 CFR 63, Subpart FFFFF that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment in accordance with 40 CFR 63.7834.

D.1.8 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Testing Requirements for Blast Furnaces [40 CFR 63.7820 through 63.7824] The Permittee must comply with these requirements on and after May 22, 2006.

(a) The Permittee shall conduct performance tests and other initial compliance demonstrations that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse in accordance with 40 CFR 63.7820.

(b) The Permittee shall conduct subsequent performance tests that apply to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse in accordance with 40 CFR 63.7821.

(c) The Permittee shall use the test methods and other procedures in 40 CFR 63.7822 when demonstrating compliance with the emission limits for particulate matter for the No. 3 Blast Furnace Casthouse Roof Monitor (V1A), No. 4 Blast Furnace Casthouse Roof Monitor (V1B) and No. 4 Blast Furnace Casthouse Baghouse (S1B).

(d) The Permittee shall use the test methods and other procedures in 40 CFR 63.7823 when demonstrating compliance with the opacity limits for the No. 3 Blast Furnace Casthouse Roof Monitor (V1A), No. 4 Blast Furnace Casthouse Roof Monitor (V1B) and No. 4 Blast Furnace Casthouse Baghouse (S1B).

(e) The Permittee shall use the test methods and other procedures in 40 CFR 63.7824 to establish and demonstrate initial compliance with operating limits for the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse and required capture and control equipment.

D.1.9 Control Device Operation

(a) The No. 3 Blast Furnace shall be equipped with excess gas bleeder flare. The pilot flame for the flare shall be present at all times the Blast Furnace is in operation in order to minimize CO emissions.

(b) The No. 4 Blast Furnace shall be equipped with excess gas bleeder flare. The pilot flame for the flare shall be present at all times the Blast Furnace is in operation in order to minimize CO emissions.

(c) The No. 4 Blast Furnace Casthouse Baghouse shall be in operation at all times when the No. 4 Blast Furnace is casting.

(d) In order to minimize PM emissions to comply with D.1.4:

(1) The iron and slag runners shall be equipped with covers and natural gas fired lances placed in appropriate areas at the No. 3 Blast Furnace for fume suppression during the cast.

(2) The iron and slag runners shall be equipped with covers and natural gas fired lances placed in appropriate areas at the No. 4 Blast Furnace for fume suppression during the cast.

(3) The iron and slag runner covers can be removed during a cast for required maintenance/malfunction and shall be promptly returned in position.

(4) At No. 3 and No. 4 Furnace, the trough hood (cover) shall be placed over the iron trough as soon as practical after drilling the taphole and remain in place during the cast until just prior to taphole closing. The hood may be removed during the cast only for required maintenance/malfunction and be promptly returned to position.

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

D.1.10 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) Visible emission notations of the No. 4 Blast Furnace Casthouse Baghouse (S1B) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.11 Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the No. 4 Blast Furnace Casthouse Baghouse (S1B), at least once per shift when the above processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 to 18.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.12 Baghouse Inspection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all bags controlling the No. 4 Blast Furnace Casthouse Baghouse (S1B) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.1.13 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired, replaced, blanked or isolated. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Emergency Provisions).

D.1.14 Sulfur Dioxide (SO2) Sampling and Analysis [326 IAC 7-4-1.1(d)]

Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.1.5, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(a) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(b) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source's operation permit per procedures specified in 326 IAC 2.

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

D.1.15 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Record Keeping Requirements for Blast Furnaces [40 CFR 63.7810(b)][40 CFR 63.7] The Permittee shall comply with these requirements on or after May 22, 2006.

(a) During the period between May 22, 2006 and the date upon which continuous monitoring systems have been installed and certified and any applicable operating limits have been set, the Permittee shall maintain a log detailing the operation and maintenance of the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse process and control equipment in accordance with 40 CFR 63.7810(b).

(b) The Permittee shall keep the records required by 40 CFR 63.7842(a).

(c) If a Continuous Opacity Monitoring System (COMS) is used to comply with an opacity standard, the Permittee shall keep the records specified in 40 CFR 63.7842(b).

(d) The Permittee shall keep the records required in 40 CFR 63.6(h)(6) for visible observations in accordance with 40 CFR 63.7842(c).

(e) The Permittee shall keep the records required in 40 CFR 63.7833 and 63.7834 to show continuous compliance with each emission limitation and operation and maintenance requirement that applies to the No. 3 Blast Furnace Casthouse and No. 4 Blast Furnace Casthouse in accordance with 40 CFR 63.7842(d).

(f) The Permittee shall keep the records required by 40 CFR 63, Subpart FFFFF in accordance with 40 CFR 63.7843 and the General Record Keeping Requirements in Section C of this permit.

D.1.16 Record Keeping Requirements

(a) To document compliance with Conditions D.1.5 and D.1.14, the Permittee shall maintain the following records:

(1) Records of the total coke oven gas, blast furnace gas, fuel oil, and natural gas usage for each day at the No. 3 and No. 4 Blast Furnaces.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

(b) To document compliance with Condition D.1.11, the Permittee shall maintain records of once per shift visible emission notations of the No. 4 Blast Furnace Casthouse Baghouse (S1B).

(c) To document compliance with Condition D.1.12, the Permittee shall maintain records, once per shift of the pressure drop across the No.4 Blast Furnace Casthouse Baghouse when venting to the atmosphere.

(d) In order to document compliance with Condition D.1.13, the Permittee shall maintain records of the results of the inspections.

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

D.1.17 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Blast Furnaces [40 CFR 63.7835][40 CFR 63.7840]

(a) The Permittee shall report each deviation in the Quarterly Deviation and Compliance Monitoring Report required by the C section of this permit, in accordance with 40 CFR 63.7835(a), 40 CFR 63.7841(d), 326 IAC 2-1.1-11, and 326 IAC 2-7-5(3).

(b) The Permittee shall submit the notifications required by 40 CFR 63.6(h)(4) and (5), 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4), and 40 CFR 63.9(b) through (h) that apply by the dates specified in those sections in accordance with 40 CFR 63.7840(a).

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003, in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The initial notification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(d) The Permittee shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(ii) and 40 CFR 63.7840(e).

(1) For each initial compliance demonstration that does not include a performance test, the Permittee shall submit the notification of compliance status before the close of business on the 30$^{th}$ calendar day following completion of the initial compliance demonstration.

(2) For each initial compliance demonstration that does include a performance test, the Permittee shall submit the notification of compliance status, including the performance test results, before the close of business on the 60$^{th}$ calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2).

(3) The notification of compliance status shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notification of compliance status requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The Permittee shall submit semiannual compliance reports in accordance with 40 CFR 63.7841(a) and (b).

(f) If a startup, shutdown, or malfunction occurred during the semiannual reporting period that was not consistent with the startup, shutdown, and malfunction plan, the Permittee shall submit an immediate startup, shutdown, and malfunction report according to the requirements in 40 CFR 63.10(d)(5)(ii) and 40 CFR 63.7841(c).

D.1.18 Requirement to Submit a Significant Permit Modification Application [326 IAC 2-7-12][326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information from the notification of compliance status in the Part 70 Operating Permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 Operating Permit the applicable requirements of 40 CFR 63, Subpart FFFFF, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than nine (9) months prior to May 22, 2006 or the date that the notification of compliance status is submitted, whichever is later.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.1.19 Reporting Requirements

A quarterly report shall be submitted containing the calculated $SO_2$ emission rate in lb/MMBtu for each facility for each day in quarter, total fuel usage for each type at each facility each day and any violations of limit 326 IAC 7-4-1.1(c)(14)(D), in order to document compliance with Conditions D.1.5 and D.1.16 (a). The quarterly report shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

**(b) One (1) Sinter Plant with a maximum raw material usage rate of 2,592,782 tons per year and a ~~maximum annual production capacity of 2,119,920 tons of sinter per year, comprised of the~~ following facilities, fugitive sources, process equipment, and operational practices: (Installed in 1958)**

(1) Raw material handling area consisting of material feeders (storage bins), conveyors, a pug mill and hearth layer returns from screening that combines these raw materials to create a uniform mixed burden that is deposited on the sinter strand.

(2) One (1) natural gas fired ignition furnace used to ignite the surface of the mixed burden deposited on the sinter strand.

(3) One (1) sinter plant main windbox, with twenty-one (21) vacuum chambers and emissions controlled by drop- out boxes, multi-cyclones (6 units), settling chamber and a wet venturi scrubber (containing chevrons) having a flow rate of 335,000 acfm, exhausting to stack-(S2A)

(4) One (1) sinter plant discharge end (breaker), with a hood to capture light dust and controlled by a wet Venturi scrubber having a flow rate of 100,400 acfm, exhausting to stack (S2B)

(5) One (1) Sinter Cooler and sinter product screening station

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

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

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [able 4 to 40 CFR 63, Subpart FFFFF]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, Sinter Plant, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee shall comply with these requirements on and after May 20, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.2.23 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Sinter Plants [40 CFR 63.7835][40 CFR 63.7640]

D.2.2 National Emissions Standards for Hazardous Air pollutants from Integrated Iron and Steel Manufacturing - Emission Limitations for Sinter Plants [40 CFR 63, Subpart FFFFF] The Permittee must comply with these requirements on and after May 22, 2006.

(a) The provisions of 40 CFR 63, Subpart FFFFF (National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing) apply to this source. The Permittee shall comply with these requirements on or after May 22, 2006 for the affected source, the Sinter Plant.

(b) The following Sinter Plant emission points are subject to 40 CFR 63, Subpart FFFFF: main windbox (S2A), sinter plant discharge (S2B) and sinter cooler.

(c) The definitions of 40 CFR 63, Subpart FFFFF are applicable to these processes in 40 CFR 63.7852.

(d) The Permittee shall meet the each emission limitation in 40 CFR 63.7790 that applies to

main windbox (S2A), sinter plant discharge (S2B) and sinter cooler.

(e) The Permittee shall meet each operation and maintenance requirements in 40 CFR 63.7800 that applies to Sinter Plant and required capture and control equipment.

(f) The Permittee shall develop and implement a written start-up, shutdown and malfunction plan in accordance with 40 CFR 63.7810(c). During periods of start-up, shutdown or malfunction, the Permittee shall operate in accordance with the plan and 40 CFR 63.7835(b).

(g) The Permittee shall meet each monitoring requirement in 40 CFR 63.7830 that applies to the Sinter Plant and required capture and control equipment.

(h) The Permittee shall meet each requirement in 40 CFR 63.7831 regarding installation, operation and maintenance of monitors for each monitor required by 40 CFR 63, Subpart FFFFF, that applies to the Sinter Plant and required capture and control equipment.

D.2.3 Particulate Matter [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1(d) TSP emissions from the Sinter Plant operations shall not exceed the following:

(a) TSP emissions from the windbox exhausting to stack (S2A) (identified in 326 IAC 6-1-10.1(d) as “stack 08") shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 49.70 pounds per hour.

(b) TSP emissions from the sinter plant discharge (breaker) exhausting to stack (S2B) shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 18.05 pounds per hour.

Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”.

D.2.4 Lake County Sulfur Dioxide (SO2) Emission Limitations [326 IAC 7-4-1]

Pursuant to 326 IAC 7-4-1.1(c)(14)(C), the SO2 emissions from the Sinter Plant windbox (S2A) shall not exceed 1.0 pound of sulfur dioxide per ton of process material and 240 pounds of sulfur dioxide per hour.

D.2.5 Sinter Plant Volatile Organic Compounds (VOCs) [326 IAC 8-13-3]

Pursuant to 326 IAC 8-13-3(b) and (c) sinter plant windbox gas VOC emissions shall be limited as follows:

(a) During the period of May 1 through September 30, the total VOC (seasonal cap) emission limit is calculated and shall not exceed 143,973.0 lbs of VOC per ozone season

(b) Except as provided in 326 IAC 8-13-3(b)(3), on any day from May 1 through September 30, the sinter plant windbox exhaust VOC emissions (the maximum daily limit) limit is calculated and shall not exceed 1001.3 lbs of VOC per day.

(c) On any day from May 1 through September 30 when ozone levels in Lake, Porter or LaPorte Counties are expected to exceed the national ambient air quality standard for ozone, the sinter plant windbox exhaust VOC emissions (the lower daily limit) limit is calculated and shall not exceed 941.0 lbs of VOC per day.

A high ozone level day shall be predicted by the Permittee in accordance with a high ozone day action plan developed by the source and submitted to the IDEM, OAQ as part of the report required by 326 IAC 8-13-4(b).

(d) Pursuant to 326 IAC 8-13-4(b)(8) and an Ozone Action Plan Approval letter date stamped September 7, 1999, the Permittee shall do the following:

(1) The Permittee will comply with the emissions limits in 326 IAC 8-13 by monitoring sinter burden oil and grease content.

(2) The Permittee will limit the oil content of the major oil bearing components (mill scale and filter cake) of the sinter plant feed materials to 0.5%.

(3) Based on the compliance demonstrations and limit calculations submitted in a letter dated March 12, 1999:

(A) The value of the operating parameter oil content (pounds) determined using the procedure per 326 IAC 8-13-5(d)(10) is 42.2 lbs oil.

(B) The operating parameter value that corresponds to the emission rates expressed in pounds of VOC per ton of sinter produced adjusted to the VOC emission limit rates specified in 326 IAC 8-13-3 is calculated as:

(i) Ozone Season = 93.06 lbs of oil

(ii) Non-ozone season = 134.00 lbs of oil

(C) Sinter oil and grease content value in pounds equivalent to one-hundredth (0.01) pound of VOC/ton of sinter produced that is used to determine compliance with 326 IAC 8-13-6 is 2.86 lbs oil for every 0.01 lbs VOC/ton sinter

(4) The Permittee shall follow the alternative test procedure submitted to IDEM for oil and grease analysis to meet the requirements of 326 IAC 8-13-5(e)(2).

(5) The Permittee shall monitor sinter production by using conveyor belt scales per the procedure identified in the Ozone Action plan.

(6) The Permittee will follow the sampling frequency as described in 326 IAC 8-13-6(c)(3)(A).

(7) When practical, routine maintenance outages may be rescheduled to coincide with an ozone alert day. Rescheduling is dependant upon the availability of manpower to perform the maintenance.

(8) The Permittee shall use IDEM's "Partners for Clean Air" ozone action day notification to predict high ozone days.

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.2.7 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Compliance Requirements for Sinter Plants [40 CFR 63.7810(a)][40 CFR 63.7825] [40 CFR 63.7826][40 CFR 63.7832] The Permittee shall comply with these requirements on or after May 22, 2006.

(a) Pursuant to 40 CFR 63.7810(a), the Permittee shall be in compliance with the emission

limitations and operation and maintenance requirements in Condition D.2.2 at all times, except during periods of start-up, shutdown and malfunction as defined in40 CFR 63.2, which incorporated by reference in 326 IAC 20-1-3.

(b) The Permittee shall demonstrate initial compliance with the emission limitations that apply to the Sinter Plant in accordance with 40 CFR 63.7825.

(c) The Permittee shall demonstrate initial compliance with the operation and maintenance requirements that apply to the Sinter Plant, in accordance with 40 CFR 63.7826.

(d) The Permittee shall monitor and collect data to demonstrate continuous compliance with 40 CFR 63, Subpart FFFFF, in accordance with 40 CFR 63.7832.

(e) The Permittee shall demonstrate continuous compliance with the emissions limitations of 40 CFR 63, Subpart FFFFF that apply to the Sinter Plant and required capture and control equipment in accordance with 40 CFR 63.7833.

(f) The Permittee shall demonstrate continuous compliance with the operation and maintenance requirements of 40 CFR 63, Subpart FFFFF that apply to the Sinter Plant and required capture and control equipment in accordance with 40 CFR 63.7834.

D.2.8 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing -Testing Requirements [40 CFR 63.7820 through 63.7824] The Permittee shall comply with these requirements on or after May 22, 2006.

(a) The Permittee shall conduct performance tests and other initial compliance demonstrations that apply to the Sinter Plant, in accordance with 40 CFR 63.7821.

(b) The Permittee shall conduct subsequent performance tests that apply to the Sinter Plant, in accordance with 40 CFR 63.7821.

(c) The Permittee shall use the test methods and other procedures in 40 CFR 63.7822 when demonstrating compliance with the emission limits for particulate matter for the main windbox (S2A), sinter plant discharge (S2B) and sinter cooler.

(d) The Permittee shall use the test methods and other procedures in 40 CFR 63.7823 when demonstrating compliance with the opacity limits for the main windbox (S2A), sinter plant discharge (S2B) and sinter cooler.

(e) The Permittee shall use the test methods and other procedures in 40 CFR 63.7824 to establish and demonstrate initial compliance with operating limits for the Sinter Plant and required capture and control equipment.

D.2.9 Testing Requirements [326 IAC 2-7-6(1), (6)]

Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform TSP and SO2 testing on the sinter plant windbox exhaust (S2A) using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.2.3 and D.2.4. Testing shall be performed using a test method that is listed in 326 IAC 6-1-10.1(f)(2) and is approved by the Commissioner. These tests shall be repeated at least once every two and a one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.2.10 Particulate Matter (PM)

In order to demonstrate compliance with D.2.3, the multi-cyclones and wet venturi scrubbers for particulate matter control shall be in operation and control emissions from the main windbox (S2A)

and sinter plant discharge (S2B) at all times that the sinter plant is in operation.

D.2.11 Windbox Gas VOC [326 IAC 8-13-4]

Pursuant to 326 IAC 8-13-4(g), the Permittee of a sintering operation who elects to change the control measure after the most recent compliance test shall do the following:

(a) Notify the IDEM at least twenty-one (21) days before implementing the change. Notification shall include the following:

(1) A description of the control measure and the appropriate operating parameter.

(2) The date the change will be implemented.

(3) The plan to comply with Condition D.2.5 with the changed control measure.

(b) Perform a compliance test within sixty (60) days of implementing the change according to procedures in 326 IAC 8-13-8 or according to the procedures that follow:

(1) Follow the source sampling procedures in 326 IAC 3-6-2.

(2) Follow the applicable test procedures.

(3) Calculate the operating parameter value that demonstrates compliance with the emission limit during the compliance test.

(4) Submit the compliance test results according to procedures in 326 IAC 8-13-4(d)(4).

(c) Maintain the value of the operating parameter within the specified boundaries after the date that the compliance test is complete.

(d) The Permittee who elects to change compliance demonstration procedures, for example, from sinter burden oil and grease content monitoring to a CEM, shall notify the OAQ at least thirty (30) days prior to making the change.

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

D.2.12 Windbox Gas VOC Emissions Monitoring [326 IAC 8-13-6]

After the date of the initial or subsequent compliance test pursuant to Condition D.2.11, the Permittee shall comply with the following requirements:

(a) Following procedures in 326 IAC 8-13-5, analyze at least one (1) sample during each of the following operating periods of an operating day:

(1) 00:00 - 08:00
(2) 08:00 - 16:00
(3) 16:00 - 24:00.

(b) The Permittee may composite a number of grab samples taken within each operating period. If sinter is produced for less than a total of sixty (60) minutes in any operating period, the Permittee is not required to sample for oil and grease content during that operating period.

(c) Compliance with the oil and grease content requirements shall be determined in one (1) of

the following ways:

(1) If the Permittee takes one (1) sample per operating period, the sample may be a composite of multiple samples taken within the operating period. The three (3) values shall be averaged over the day; and

(A) The daily average value may exceed the operating parameter on not more than five (5) days per month by an oil amount not to exceed one-hundredth (0.01) pound of VOC per ton of sinter produced as determined by the initial or subsequent compliance test;

(B) The daily average of the samples taken the day after the day in which the excursion occurred must be in compliance with the operating parameter;

(C) An excursion greater than the specified percentage in excess of the operating parameter shall be considered a violation of the rule; and

(D) More than five (5) excursions in a single month shall be considered a violation of this rule.

(2) If the Permittee analyzes four (4) or more samples per operating period and determines the daily average oil and grease content values, then:

(A) The daily average oil and grease content shall not exceed the operating parameter determined in 326 IAC 8-13-5(d)(10) or 326 IAC 8-13-5(d)(11);

(B) An exceedance of the operating parameter is a violation of the rule; and

(C) No excursions are allowed since the greater number of samples should decrease the sampling variation.

(3) Owners or operators of a sintering process that meet the emission limits in 326 IAC 8-13-3 (Condition D.2.5) by means other than those specified in 326 IAC 8-13-6 (b) or (c) shall describe the following:

(A) Operation and maintenance of the control measure;

(B) The process parameter or parameters and the value and range of the process parameter or parameters that indicate compliance with the emission limit; and

(C) The operating records that will be maintained.

D.2.13 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) Visible emission notations of the Sinter Plant windbox main scrubber stack (S2A), and the discharge end scrubber stack (S2B) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.14 Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) The Permittee shall record the total static pressure drop across to the windbox main scrubber used in conjunction with the sinter plant operations, at least once per shift when the windbox (S2A) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the windbox main baghouse is outside the normal range of 15 to 55 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the windbox main scrubber used in conjunction with the sinter plant operations, at least once per shift when the windbox is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is below the minimum rate of 1800 gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) The Permittee shall record the total static pressure drop across the sinter plant discharge (breaker) scrubber (S2B) used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the discharge (breaker) scrubber is outside the normal range of 8.0 and 12.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the sinter plant discharge (breaker) scrubber used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is below the minimum rate of 200 gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

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

D.2.15 Scrubber Inspection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all scrubbers controlling the windbox main scrubber (S2A) and sinter plant discharge (breaker) scrubber (S2B) when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

D.2.16 Scrubber Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.17 Cyclone Inspection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all cyclones controlling the sinter plant operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months.

D.2.18 Cyclone Failure Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.19 Sulfur Dioxide (SO2) Sampling and Analysis [326 IAC 7-4-1.1(d)]

Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.2.4, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(a) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(b) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source's operation permit per procedures specified in 326 IAC 2.

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

D.2.20 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Record Keeping Requirements for Sinter Plants [40 CFR 63.7810(b)][40 CFR 3 Sinter Plant process and control equipment in accordance with 40 CFR 63.7810(b)] [40 CFR 63.7] The Permittee shall comply with these requirements on or after May 22, 2006.

(a) During the period between May 22, 2006 and the date upon which continuous monitoring systems have been installed and certified and any applicable operating limits have been set, the Permittee shall maintain a log detailing the operation and maintenance of the Sinter Plant process and control equipment in accordance with 40 CFR 63.7810(b).

(b) The Permittee shall keep the records required by 40 CFR 63.7842(a).

(c) If a Continuous Opacity Monitoring System (COMS) is used to comply with an opacity standard, the Permittee shall keep the records specified in 40 CFR 63.7842(b).

(d) The Permittee shall keep the records required in 40 CFR 63.6(h)(6) for visible observations in accordance with 40 CFR 63.7842(c).

(e) The Permittee shall keep the records required in 40 CFR 63.7833 and 63.7834 to show

continuous compliance with each emission limitation and operation and maintenance requirement that applies to the Sinter Plant in 40 CFR 63.7842(d).

(f) The Permittee shall keep the records required by 40 CFR 63, FFFFF in accordance with 40 CFR 63.7843 and the General Record Keeping Requirements in Section C of this permit.

D.2.21 Record Keeping Requirements [326 IAC 8-13-3]

(a) To document compliance with the limit in Condition D.2.5, the Permittee shall maintain the following records:

(1) Applicable operating parameter value and actual operating parameter values;

(2) Sinter produced in tons each operating day;

(3) Material sampled;

(4) Sampling date and time;

(5) Oil content values;

(6) For the period of May 1 through September 30, the following records shall be maintained:

(A) The VOC emitted in pounds each operating day.

(B) The cumulative total of VOC emitted.

(C) VOC emission rate in pounds per ton of sinter produced.

D.2.22 Record Keeping Requirements

(a) To document compliance with Condition D.2.13, the Permittee shall maintain records of once per shift visible emission notations of the sinter plant stack exhausts.

(b) To document compliance with Condition D.2.14, the Permittee shall maintain the following:

(1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:

(A) Pressure drop across the venturi scrubber

(B) Flow rate

(c) To document compliance with Conditions D.2.15, the Permittee shall maintain records of the results of the inspections.

(d) To document compliance with Condition D.2.17, the Permittee shall maintain records of the results of the inspections.

(e) To document compliance with Conditions D.2.4 and D.2.19, the Permittee shall maintain the following records:

(1) Records of the total coke oven gas, blast furnace gas, fuel oil, and natural gas usage for each day at the Sinter Plant windbox.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

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

D.2.23 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Reporting Requirements for Sinter Plants [40 CFR 63.7835][40 CFR 63.7640]

(a) The Permittee shall report each deviation in the Quarterly Deviation and Compliance Monitoring Report required by the Section C of this permit in accordance with 40 CFR 63.7835(a), 40 CFR 63.7841(d), 326 IAC 2-1.1-11 and 326 IAC 2-7-5(3).

(b) The Permittee shall submit the notifications required by 40 CFR 63.6(h)(4) and (5), 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and 40 CFR 63.9(b) through (h) that apply by the dates specified in those sections in accordance with 40 CFR 63.7840(a).

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003 in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The initial notification does require the certification by the “responsible official” as defined in 326 IAC 2-7-1(34).

(d) The Permittee shall submit a notification or compliance status in accordance with 40 CFR 63.9(h)(2)(ii) and 40 CFR 63.7840(e).

(1) For each initial compliance demonstration that does not include a performance test, the Permittee shall submit the notification of compliance status before the close of business on the 30th calendar day following completion of the initial compliance demonstration.

(2) For each initial compliance demonstration that does include a performance test, the Permittee shall submit the notification of compliance status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2).

(3) The notification of compliance status shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 Jackson Boulevard
Chicago, Illinois 60604-3590

The notification of compliance status requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The Permittee shall submit semiannual compliance reports in accordance with 40 CFR 63.7841(a) and (b).

(f) If a start-up, shutdown or malfunction occurred during the semiannual reporting period that was not consistent with the start-up, shutdown or malfunction plan, the Permittee shall submit an immediate start-up, shutdown and malfunction report according to the requirements in 40 CFR 63.10(d)(5)(ii) and 40 CFR 63.7841(c).

D.2.24 Requirements to Submit a Significant Permit Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM-OAQ to include information from the notification of compliance status in the Part 70 Operating permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Part 70 Operating permit the applicable requirements of 40 CFR 63, Subpart FFFFF, a description of the affected source and activities subject to the standard and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than nine (9) months prior to May 22, 2006 or the date that the notification of compliance status is submitted, which ever is later.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

D.2.25 Reporting Requirements

The Permittee shall submit to the IDEM, OAQ, within thirty (30) days of the end of each calendar quarter the calculated sulfur dioxide emission rate in pounds per million Btu for each facility for each day during the calendar quarter and the total fuel usage for each type at each facility for each day. The summary of the information to document compliance with Condition D.2.22 (e), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

**SECTION D.3 FACILITY OPERATION CONDITIONS**

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

**(c) Basic Oxygen Furnace (BOF) Shop, comprised of the following facilities, process equipment, and operational practices:**

(1) One (1) Hot Metal Reladle/Desulf Complex consisting of two (2) reladle stations, two (2) desulfurization stations and two (2) slag skimming stations, installed in 1982, having a maximum capacity of 5,630,208 tons per year of hot metal and sulfur scavenger. Emissions from all stations are controlled by a baghouse, designated as Baghouse No. 1 with captured emissions exhausting to stack (S3B) and uncaptured/fugitive emissions exhausting through a roof monitor (V3B)

(2) One (1) Basic Oxygen Furnace (BOF) Complex, consisting of two (2) basic oxygen furnaces, designated as No. 1 and No. 2 Furnace, installed in 1968, having a combined maximum capacity of 7,456,512 tons of hot metal, flux, alloys, and scrap per year. Emissions from furnace operations such as charging, oxygen blowing and tapping are controlled by an electrostatic precipitator, with captured emissions exhausting to stack S3A and uncaptured/fugitive emissions exhausting through a roof monitor at vent V3A;

(3) One (1) Ladle Metallurgical Facility (LMF), installed in 1988, consisting of (2) heating stations, having a combined maximum capacity of 5,606,400 tons of hot metal, flux and alloys per year. Emissions from LMF operations such as argon stirring, heating, and alloy addition, are controlled by a baghouse, designated as Baghouse No. 5 (LMF), with captured emissions exhausting to stack (S3C) and uncaptured/fugitive emissions exhausting through a roof monitor at vent (V3C)

(4) One (1) Vacuum Degassing Facility (decarbonization), installed in 1988, with carbon monoxide (CO) emissions controlled by an integral CO scrubber and exhausting to the flare at stack (S3D)

(5) One (1) Continuous Casting Complex consisting of two (2) single–strand slab casting machines, each with its own ladle turrent, tundish and mold. Molten steel from the LMF is directed into the turrent than cooled in the mold to begin the solidification process. The steel continues to solidify as it passes through the water spray cooling system to produce slabs that are finally cut to length using an acetylene torch-cutting machine. Emissions from water-cooling are directed to stacks (S3E/F).

(6) Lime handling operations including trailer unloading and lime handling from silos with emissions captured by single compartment, 16 bag filter vents;

(7) Miscellaneous dust removal process consisting of recovered BOF ESP dust, baghouse dust, handling and conditioning equipment, silos and pug mill; (fugitives)

(8) Miscellaneous natural gas combustion consisting of ladle preheat, ladle drying, space heaters, tundish preheat and drying, tundish nozzle preheat, ladle shroud preheat, and slab torch cutting; and

(9) Miscellaneous material handling.

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

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

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [Table 4 to 40 CFR 63, Subpart FFFFF]

(a) The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, Basic Oxygen Process Furnace (BOPF), except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee shall comply with these requirements on and after May 20, 2003.

(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this

permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.3.18 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7835][40 CFR 63.7640]

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D.3.2 National Emissions Standards for Hazardous Air pollutants from Integrated Iron and Steel Manufacturing - Emission Limitations for Basic Oxygen Process Furnace (BOPF) [40 CFR 63, Subpart FFFFF] The Permittee shall comply with these requirements on and after May 20, 2003.

The provisions of 40 CFR 63, Subpart FFFFF (National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing) apply to this source. The Permittee shall comply with these requirements on or after May 22, 2006 for the affected source, the Basic Oxygen Process Furnace (BOPF). The following emission units comprise the affected source that is subject to specific requirements of 40 CFR 63, Subpart FFFFF: Basic Oxygen Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex (reladling, desulfurization and slag skimming), Ladle Metallurgy Facility and BOPF roof monitor (V3A).

(a) The definitions of 40 CFR 63, Subpart FFFFF are applicable to these processes in 40 CFR 63.7852.

(b) The Permittee shall meet the each emission limitation in 40 CFR 63.7790 that applies to: Basic Oxygen Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex (reladling, desulfurization and slag skimming), Ladle Metallurgy Facility and BOPF roof monitor (V3A).

(c) The Permittee shall meet each operation and maintenance requirements in 40 CFR 63.7800 that applies to Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment.

(d) The Permittee shall develop and implement a written start-up, shutdown and malfunction plan in accordance with 40 CFR 63.7810(c). During periods of start-up, shutdown or malfunction, the Permittee shall operate in accordance with the plan and 40 CFR 63.7835(b).

(e) The Permittee shall meet each monitoring requirement in 40 CFR 63.7830 that applies to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment.

(f) The Permittee shall meet each requirement in 40 CFR 63.7831 regarding installation, operation and maintenance of monitors for each monitor required by 40 CFR 63, Subpart FFFFF, that applies to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment.

D.3.3 Lake County PM emission requirements [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1(d) (Lake County PM10 Requirements) PM10 emissions from the Basic Oxygen Furnace operations shall not exceed the following:

(a) PM10 emissions from the Reladle/desulfurization baghouse (Baghouse No.1) exhausting to stack (S3B) shall not exceed 0.008 grains PM10 per dry standard cubic foot of exhaust air and 10.49 pounds PM10 emitted per hour.

(b) PM10 emissions from the electrostatic precipitator exhausting to stack (S3A) (BOF main stack) shall not exceed 0.018 grains PM10 per dry standard cubic foot of exhaust air and 69.40 pounds PM10 emitted per hour.

(c) PM10 emissions from the ladle metallurgical station baghouse (LMF Baghouse) exhausting

to stack (S3C) shall not exceed 0.004 grains PM10 per dry standard cubic foot of exhaust air and 3.630 pounds PM10 emitted per hour.

Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”.

D.3.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 the Hot Metal Reladle/Desulf Roof Monitor (V3B), BOF Roof Monitor (V3A) and LMF Roof Monitor (V3C) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

D.3.5 Opacity [326 IAC 6-1-10.1(e)]

Pursuant to 326 IAC 6-1-10.1(e), the following opacity limits shall be complied with and shall take precedence over those in 326 IAC 5-1-2 with which they conflict. The opacity limits for the BOF operations shall be as follows:

(a) Visible emissions from the reladle/desulfurization baghouse (stack S3B) shall not exceed five percent (5%) opacity, three (3) minute average.

(b) Visible emissions from the basic oxygen furnace main electrostatic precipitator stack (stack S3A) shall not exceed twenty percent (20%) opacity, six (6) minute average.

(c) Visible emissions from the basic oxygen furnace roof monitor (vent V3A) shall not exceed twenty percent (20%) opacity, three (3) minute average.

(d) Visible emissions from the ladle metallurgical facility (LMF) baghouse (stack S3C) shall not exceed five percent (5%) opacity, three (3) minute average.

D.3.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.3.7 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Compliance Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7810(a)][40 CFR 63.7825] [40 CFR 63.7826][40 CFR 63.7832] The Permittee shall comply with these requirements on or after May 22, 2006

(a) Pursuant to 40 CFR 63.7810(a), the Permittee shall be in compliance with the emission limitations and operation and maintenance requirements in Condition D.5.2 at all times, except during periods of start-up, shutdown and malfunction as defined in 40 CFR 63.2, which incorporated by reference in 326 IAC 20-1-3.

(b) The Permittee shall demonstrate initial compliance with the emission limitations that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility in accordance with 40 CFR 63.7825.

(c) The Permittee shall demonstrate initial compliance with the operation and maintenance requirements that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility in accordance with 40 CFR 63.7826.

(d) The Permittee shall monitor and collect data to demonstrate continuous compliance with 40 CFR 63, Subpart FFFFF, in accordance with 40 CFR 63.7832.

(e) The Permittee shall demonstrate continuous compliance with the emissions limitations of

40 CFR 63, Subpart FFFFF that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment in accordance with 40 CFR 63.7833.

(f) The Permittee shall demonstrate continuous compliance with the operation and maintenance requirements of 40 CFR 63, Subpart FFFFF that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment in accordance with 40 CFR 63.7834.

D.3.8 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing -Testing Requirements [40 CFR 63.7820 through 63.7824] The Permittee shall comply with these requirements on or after May 22, 2006

(a) The Permittee shall conduct performance tests and other initial compliance demonstrations that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility, in accordance with 40 CFR 63.7821.

(b) The Permittee shall conduct subsequent performance tests that apply to the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility, in accordance with 40 CFR 63.7821.

(c) The Permittee shall use the test methods and other procedures in 40 CFR 63.7822 when demonstrating compliance with the emission limits for particulate matter for Basic Oxygen Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex (reladling, desulfurization and slag skimming), Ladle Metallurgy Facility and BOPF roof monitor (V3A).

(d) The Permittee shall use the test methods and other procedures in 40 CFR 63.7823 when demonstrating compliance with the opacity limits for the Basic Oxygen Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex (reladling, desulfurization and slag skimming), Ladle Metallurgy Facility and BOPF roof monitor (V3A).

(e) The Permittee shall use the test methods and other procedures in 40 CFR 63.7824 to establish and demonstrate initial compliance with operating limits for the Basic Oxygen Process Furnace (BOF) Complex, Hot Metal Reladle/Desulfurization Complex and Ladle Metallurgy Facility and required capture and control equipment.

D.3.9 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]

Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform PM10 testing on the BOF electrostatic precipitator main stack utilizing a testing method approved by the Commissioner in accordance with Section C - Performance Testing. PM10 shall be measured by the appropriate method as listed in 326 IAC 6-1-10.1(f)(1). This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.10 Particulate Matter (PM) & Carbon Monoxide (CO)

The reladle/desulfurization baghouse, the ladle metallurgical facility (LMF) baghouse, the main electrostatic precipitator, the CO scrubber, and flare shall be in operation at all times when associated processes are in operation.

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

D.3.11 Opacity Continuous Emission Monitoring [326 IAC 6-1-10.1(g)(2)]

Pursuant to 326 IAC 6-1-10.1(g)(2), the main basic oxygen furnace electrostatic precipitator stack shall be equipped with a Continuous Emission Monitoring (COM) for opacity. The COM shall comply with the maintenance, operating procedures, quality assurance procedures, and

performance specifications in 326 IAC 3-5.

D.3.12 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) Visible emission notations of the reladle/desulfurization baghouse stack (S3B) and the ladle metallurgical facility (LMF) baghouse stack (S3C) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.3.13 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the reladle/desulfurization operations (S3B), and the ladle metallurgical facility (LMF) operations (S3C) at least once per shift when the associated processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0 to 12.0 inches of water or a range established during the latest stack test, for the reladle/desulfurization operations (S3B) and 4.0 to 9.0 inches of water or a range established during the latest stack test for the ladle metallurgical facility (LMF) operations (S3C), the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

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

D.3.14 Baghouse Inspections [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

An inspection shall be performed each calendar quarter of all bags controlling the reladle/desulfurization operations (S3B), and the ladle metallurgical facility (LMF) operations (S3C) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

D.3.15 Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired, replaced, blanked or isolated. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response

steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Emergency Provisions).

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

D.3.16 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Record Keeping Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7810(b)][40 CFR 3 Basic Oxygen Process Furnace (BOPF) process and control equipment in accordance with 40 CFR 63.7810(b)] [40 CFR 63.7] The Permittee shall comply with these requirements on or after May 22, 2006

(a) During the period between May 22, 2006 and the date upon which continuous monitoring systems have been installed and certified and any applicable operating limits have been set, the Permittee shall maintain a log detailing the operation and maintenance of the Basic Oxygen Process Furnace (BOPF) process and control equipment in accordance with 40 CFR 63.7810(b).

(b) The Permittee shall keep the records required by 40 CFR 63.7842(a).

(c) If a Continuous Opacity Monitoring System (COMS) is used to comply with an opacity standard, the Permittee shall keep the records specified in 40 CFR 63.7842(b).

(d) The Permittee shall keep the records required in 40 CFR 63.6(h)(6) for visible observations in accordance with 40 CFR 63.7842(c).

(e) The Permittee shall keep the records required in 40 CFR 63.7833 and 63.7834 to show continuous compliance with each emission limitation and operation and maintenance requirement that applies to the Basic Oxygen Process Furnace (BOPF) in 40 CFR 63.7842(d).

(f) The Permittee shall keep the records required by 40 CFR 63, FFFFF in accordance with 40 CFR 63.7843 and the General Record Keeping Requirements in Section C of this permit.

D.3.17 Record Keeping Requirements

(a) In order to document compliance with Condition D.3.12, the Permittee shall maintain records of once per shift visible emission notations of the reladle/desulfurization baghouse stack (S3B) and the ladle metallurgical facility (LMF) baghouse stack (S3C).

(b) In order to document compliance with condition D.3.13, the Permittee shall maintain records, once per shift of the pressure drop across the baghouse when venting to the atmosphere.

(c) In order to document compliance with Condition D.3.14, the Permittee shall maintain

records of the results of the inspections.

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

D.3.18 Reporting Requirements

The Permittee shall submit a quarterly excess emissions report, based on the continuous opacity monitor (COM) required in conditions D.3.11 data for opacity, pursuant to 326 IAC 3-5-7. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

D.3.19 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Reporting Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7835][40 CFR 63.7640]

(a) The Permittee shall report each deviation in the Quarterly Deviation and Compliance Monitoring Report required by the Section C of this permit in accordance with 40 CFR 63.7835(a), 40 CFR 63.7841(d), 326 IAC 2-1.1-11 and 326 IAC 2-7-5(3).

(b) The Permittee shall submit the notifications required by 40 CFR 63.6(h)(4) and (5), 40 CFR 63.7(b) and (c), 40 CFR 63.8(e) and (f)(4) and 40 CFR 63.9(b) through (h) that apply by the dates specified in those sections in accordance with 40 CFR 63.7840(a).

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003 in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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

(d) The Permittee shall submit a notification or compliance status in accordance with 40 CFR 63.9(h)(2)(ii) and 40 CFR 63.7840(e).

(1) For each initial compliance demonstration that does not include a performance test, the Permittee shall submit the notification of compliance status before the close of business on the 30th calendar day following completion of the initial compliance demonstration.

(2) For each initial compliance demonstration that does include a performance test, the Permittee shall submit the notification of compliance status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2).

(3) The notification of compliance status shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 Jackson Boulevard
Chicago, Illinois 60604-3590

The notification of compliance status requires the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The Permittee shall submit semiannual compliance reports in accordance with 40 CFR 63.7841(a) and (b).

(f) If a start-up, shutdown or malfunction occurred during the semiannual reporting period that was not consistent with the start-up, shutdown or malfunction plan, the Permittee shall submit an immediate start-up, shutdown and malfunction report according to the requirements in 40 CFR 63.10(d)(5)(ii) and 40 CFR 63.7841(c).

D.3.20 Requirements to Submit a Significant Permit Application [326 IAC 2-7-12] [326 IAC 2-7-5]

The Permittee shall submit an application for a significant permit modification to IDEM-OAQ to include information from the notification of compliance status in the Part 70 Operating permit.

(a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient to IDEM, OAQ to incorporate into the Part 70 Operating permit the applicable requirements of 40 CFR 63, Subpart FFFFF, a description of the affected source and activities subject to the standard and a description of how the Permittee will meet the applicable requirements of the standard.

(b) The significant permit modification application shall be submitted no later than nine (9) months prior to May 22, 2006 or the date that the notification of compliance status is submitted, which ever is later.

(c) The significant permit modification application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

**SECTION D.4 FACILITY OPERATION CONDITIONS**

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

**(d) 84 Inch Hot Strip Mill, comprising the following facilities, process equipment, and operational practices:**

(1) Three (3) Reheat Furnaces identified as Nos. 1, 2 and 3, installed in 1968, having a heat input rate of 427 MMBtus per hour each.

(A) No. 1 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4A.

(B) No. 2 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4B.

(C) No. 3 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4C.

(2) One (1) Hot Rolling Mill, where steel slabs from the reheat furnaces are converted to hot bands (steel coils). The mill consists of scale breakers, six (6) roughing stands, a crop shear, seven (7) finishing stands, a cooling table and three (3) downcoilers. The mill fugitive emissions from these processes vent inside the building (V4A).

(3) One (1), two (2) stand temper mill.

(4) Twenty-eight (28) natural gas space heaters having a combined heat input rate of 84 MMBtu/hr.

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

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

D.4.1 Particulate Matter [326 IAC 6-1-10.1]

(a) Pursuant to 326 IAC 6-1-10.1(d)(22) the PM10 emissions from each of the stacks serving the three (3) natural gas/fuel oil furnaces (S4A, S4B and S4C) shall not exceed 0.086 lbs/MMBtu and 36.56 pounds PM10 emitted per hour.

(b) Pursuant to 326 IAC 6-1-10.1(h)(14) the allowable TSP emissions from the twenty-eight (28) natural gas space heater (V4A) shall not exceed 0.003 lbs/MMBtu and 0.250 pounds per hour period combined and burn natural gas only.

Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”.

D.4.2 Sulfur Dioxide (SO2) [326 IAC 7-4-1.1(c)(14)(D)]

Pursuant to 326 IAC 7-4-1.1(c)(14)(B), the SO2 emissions from each of the stacks serving the three (3) natural gas/fuel oil furnaces (S4A, S4B and S4C) shall not exceed 1.254 lb SO2/MMBtu and 535.1 pounds per hour.

D.4.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.4.4 Visible Emissions Notations [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) Visible emission notations of the three (3) natural gas/fuel oil furnaces stacks (S4A, S4B

and S4C) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and using fuel oil. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.4.5 Sulfur Dioxide (SO2) Sampling and Analysis [326 IAC 7-4-1.1(d)]

Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.4.2, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(a) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(b) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source's operation permit per procedures specified in 326 IAC 2.

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

D.4.6 Record Keeping Requirements

(a) To document compliance with Condition D.4.1 (b), the Permittee shall maintain records of natural gas use at the hot strip space heaters.

(b) In order to document compliance with Condition D.4.4, the Permittee shall maintain records of once per shift visible emission notations of the three (3) natural gas/fuel oil furnaces stacks (S4A, S4B and S4C), when using fuel oil.

(c) To document compliance with Conditions D.4.2 and D.4.5, the Permittee shall maintain the following records:

(1) Records of the total fuel oil, and natural gas usage for each day at the No. 1, 2 and 3 Reheat Furnaces.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

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

D.4.7 Reporting Requirements

The Permittee shall submit to the IDEM, OAQ, within thirty (30) days of the end of each calendar quarter the calculated sulfur dioxide emission rate in pounds per million Btu for each facility for each day during the calendar quarter and the total fuel usage for each type at each facility for each day. The summary of the information to document compliance with Condition D.4.7 (c), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

**SECTION D.5 FACILITY OPERATION CONDITION**

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

**(e) One (1) Sheet Mill Finishing operation, designated as No. 2 Sheet Mill, having a maximum capacity of 1,404,929 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) No. 1 Galvanizing Line (installed in 1959) consisting of:

(A) Flame Furnace having heat input rate of 18 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(B) Galvanize furnace having a heat input rate of 37 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(D) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(E) Hot air dryer exhausting to No. 2 Sheet Mill shop

(2) No. 2 Galvanizing Line (installed in 1988) consisting of:

(A) Flame Furnace having heat input rate of 150 MMBtu/hr with uncontrolled emissions exhausting through stack S5B.

(B) Galvanize furnace having a heat input rate of 54 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) One (1) natural gas fired Edge Flame Burner on line No. 2, with uncontrolled emissions venting into the No. 2 Sheet Mill shop

(D) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(E) One (1) natural gas fired Selas Furnace, with uncontrolled emissions venting through vent (V5A) to No. 2 Sheet Mill shop

(F) Hot air dryers exhausting to No. 2 Sheet Mill shop

(G) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(H) Temper Mill

(3) Two (2) natural gas fired boilers designated as Boiler No. 7 and Boiler No. 8 (installed in 1955), having a combined heat input of 98 MMBtu per hour, with uncontrolled emissions exhausting to (S5C)

(4) Seven (7) space heaters (installed in 1968) having a combined heat input of 17.5 MMBtu per hour, with uncontrolled emissions exhausting to vent (V5B) to No. 2 Sheet Mill shop.

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

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

D.5.1 Particulate Matter [326 IAC 6-1-10.1(h)]

Pursuant to 326 IAC 6-1-10.1(h) (Lake County PM10 Emission Requirements) combustion from the No. 1 and No. 2 Galvanizing Line Flame Furnaces and the No. 1 and No. 2 Galvanizing Line

Galvanizer Furnaces, Boiler No. 7 and Boiler No. 8 at the No. 2 Sheet Mill and the seven (7) space heaters shall be restricted to the use of natural gas as only fuel and the total suspended particulate (TSP) and particulate matter ($PM_{10}$) emissions shall not exceed the following:

(a) The total suspended particulate emissions from the No. 1 Galvanizing Line Galvanizer Furnace (V5A) and No. 2 Galvanizing Line Galvanizer Furnace (V5B) shall not exceed 0.003 pounds per MMBtu and 0.265 pounds per one (1) hour period combined.

(b) The particulate matter ($PM_{10}$) emissions from the No. 1 Galvanizing Line Flame Furnace (V5A) and No. 2 Galvanizing Line Flame Furnace (S5B) shall not exceed 0.003 pounds per MMBtu and 0.500 pounds per one (1) hour period combined.

(c) The total suspended particulate emissions from Boiler No. 7 and Boiler No. 8 (S5C) shall not exceed 0.003 pounds per MMBtu and 0.290 pounds per one (1) hour period combined.

(d) The total suspended particulate emissions from the seven (7) space heaters (V5B) shall not exceed 0.003 pounds per MMBtu and 0.050 pounds per one (1) hour period combined.

D.5.2 Sulfur Dioxide (SO2) [326 IAC 7-4-1.1]

Pursuant to 326 IAC 7-4-1.1(c)(14)(B), the Boiler No. 7 and Boiler No. 8 (S5C) shall use natural gas only.

D.5.3 Opacity

Pursuant to Construction Permit PC (45) 1702, issued August 4, 1988, the visible emissions from the No. 2 Galvanizing Line Flame Furnace (S5B) shall not exceed 5% opacity, 6-minute average.

D.5.4 Emission Offset [326 IAC 2-3]

Pursuant to Construction Permit PC (45) 1702, issued August 4, 1988, in order to make requirements of 326 IAC 2-2 not applicable the following shall apply:

(a) NOx emissions from the No. 2 Galvanizing Line Flame Furnace (S5B) shall be limited to 550 pounds per MMCF of natural gas and 361.35 tons per year.

(a) the permanent shutdown in 1984 of 10 soaking pit sets, No. 2 slab mill, rated at 90 MMBtu/hr per set, and actual 1983 emissions based on 2,446 million cubic feet per year of natural gas.

(a) the permanent shutdown in 1984 of the No. 2 High pressure boiler, rated at 190 MMBtu/hr and actual 1984 emissions based on 449 million cubic feet per year of natural gas and 86,000 gallon per year No. 6 fuel oil.

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.5.6 Sulfur Dioxide (SO2) Sampling and Analysis [326 IAC 7-4-1.1(d)]

Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.5.6, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(a) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(b) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the

source's operation permit per procedures specified in 326 IAC 2.

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

D.5.7 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.5.4 shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

## SECTION D.6 FACILITY OPERATION CONDITIONS

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

**(f) One (1) Sheet Mill Finishing operation, designated as No. 3 Sheet Mill, having a maximum capacity of 2,156,537 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) Seven (7) Single Stack Batch Annealing Furnaces (1-7) (installed in 1965), having a combined heat input of 24.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(2) Eleven (11) Four-Stack Batch Annealing Furnaces (1-11)(installed in 1966), having a combined heat input of 176 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(3) One (1) Four-Stack Batch Annealing Furnace (13) (installed in 1998) with a heat input capacity of 10 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(4) Three (3) Open Coil (Hydrogen) Annealing Furnaces (1-3), having a combined heat input of 10.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(5) One (1) Pickle Line consisting of four (4) HCI process tanks and one (1) water rinse tank (installed in 1964), with acid fumes controlled by a scrubber system (14,000 acfm) comprised of tank hoods and ductwork connected to two (2) scrubbers (in series) exhausting through scrubber stack (S6A)

(6) One (1) Shot Blaster, used to put a matte finish on the surface of reconditioned rolls. Emissions are controlled by a small baghouse exhausting through vent (V6B) outside the building.

(7) One (1) tempering operation consisting of a 2-Stand Temper Mill with fugitive emissions exhausting inside the building.

(8) One (1) steel coil cold reduction operation consisting of one (1) 5- Stand Tandem Mill where steel coil thickness is reduced to final specification, with emissions exhausting through stack (S6B)

(9) Miscellaneous activities include two (2) steel sheet edge slitters, electrostatic oiling space heating and portable heating (to prevent equipment freezing).

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

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

D.6.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the emission units described in this section except when otherwise specified in 40 CFR 63, Subpart CCC.

D.6.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCI Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63, Subpart CCC] [40 CFR 63.1157]

Pursuant to 40 CFR 63, Subpart CCC, the Pickling Line (S6A) shall comply with the following requirements:

(a) The Permittee shall not cause or allow to be discharged into the atmosphere from the affected pickling line:

(1) Any gases that contain HCI in a concentration in excess of 18 ppmv; or

(2) HCI at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

D.6.3 NESHAP Maintenance Requirements [40 CFR 63.1160, Subpart CCC]

The Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) (Subpart A, General Provisions) at the Pickling Line (S6A). Additionally, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Part 70 Operating Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

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

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

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

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

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

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

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

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

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

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

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

(g) The Permittee shall maintain a record of each inspection, including each item identified in (d) above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.

D.6.4 Particulate Matter [326 IAC 6-1-10.1(h)]

Pursuant to 326 IAC 6-1-10.1(h) (Lake County PM10 Emission Requirements) the seven (7) single stack batch annealing furnaces, the eleven (11) multi-stack batch annealing furnaces, and the three (3) open coil (hydrogen) annealing furnaces shall fire natural gas only, and the total suspended particulate (TSP) emissions shall be limited as follows:

(a) The total suspended particulate emissions from the seven (7) single stack batch annealing furnaces (V6A) shall not exceed 0.003 pounds per MMBtu and 0.071 pounds of TSP emissions emitted per one (1) hour period combined.

(b) The total suspended particulate emissions from the eleven (11) multi-stack batch annealing furnaces (V6A) shall not exceed 0.003 pounds per MMBtu and 0.520 pounds of TSP emissions emitted per one (1) hour period combined.

(c) The total suspended particulate emissions from the three (3) open coil (hydrogen) annealing furnaces (V6A) shall not exceed 0.003 pounds per MMBtu and 0.031 pounds of TSP emissions emitted per one (1) hour period combined.

D.6.5 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant 326 IAC 6-1-2, the Pickle Line (S6A), Shot Blaster (V6B), 2-Stand Temper Mill (S6B) and 5-Stand Tandem Mill (V6B) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

D.6.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.6.7 Testing Requirements [40 CFR 63.1161][40 CFR 63.1162]

(a) Within twelve (12) months of permit issuance, the Permittee shall conduct a performance test for the Pickling Line (S6A) to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR 63.7 (Subpart A, General Provisions). This initial performance test shall meet the following minimum requirements:

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

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

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

(b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation**,** the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative

compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(c) Conduct performance tests to measure the HCl flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR 63.1161. Performance tests shall be conducted according to an alternative schedule approved by IDEM, OAQ, every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.

(d) Pursuant to 40 CFR 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ, in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ, to review and approve the site-specific test plan required under 40 CFR 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.

(e) The following test methods from Appendix A of 40 CFR 60 shall be used to determine compliance under 40 CFR 63.1157(a);

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

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

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

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

(5) Method 26A, “Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method,” to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows: $C_{HCL(ppmv)} = 0.659\ C_{HCL(mg/dscm)}$, where $C_{(ppmv)}$ is concentration in ppmv and $C_{(mg/dscm)}$ is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

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

D.6.8 Monitoring Requirements [40 CFR 63.1162]

The Permittee shall:

(a) In addition to conducting performance tests, if a wet scrubber is used as the emission control device, install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2).

(b) Failure to record each of the operating parameters in 40 CFR 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR 63, Subpart CCC.

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

(d) The Permittee may develop and implement alternative monitoring requirements subject to approval by U.S. EPA.

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

D.6.9 Record Keeping Requirements

(a) To document compliance with Conditions D.6.2 and D.6.3, the Permittee shall maintain the following records pursuant to 40 CFR 63.1165:

(1) The Permittee, as required by 40 CFR 63.10(b)(2) (Subpart A, General Provisions), shall maintain general records for 5 years from the date of each record of:

(A) The occurrence and duration of each startup, shutdown, or malfunction of operation;

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

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

(D) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;

(E) All information necessary to demonstrate conformance with the startup shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR 63.10(b)(2)(v))

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

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

(H) If the Permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;

(I) If the Permittee has been granted a waiver from the initial performance test under 40 CFR 63.7(h), a copy of the full request and approval or disapproval;

(J) All documentation supporting initial notifications and notifications of compliance status required by 40 CFR 63.9; and

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

(2) In addition to the general records required by 40 CFR 63.1165(a), the Permittee shall maintain records for 5 years from the date of each record of:

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

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

(C) Each maintenance inspection and repair, replacement, or other corrective action; and

(3) The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ, for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR 63, Subpart CCC. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by IDEM, OAQ, for a period of 5 years after each revision to the plan.

(b) General records and 40 CFR 63, Subpart CCC records, for the most recent 2 years of operation must be maintained on site for 2 years. Records for the 3 previous years may be maintained off site.

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

D.6.10 Reporting Requirements [40 CFR 63.1164]

(a) As required by 40 CFR 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40 CFR 63.1163.

(b) The Permittee of an affected source who is required to submit progress reports under 40 CFR 63.6(i), shall submit such reports to IDEM, OAQ by the dates specified in the written extension of compliance.

(c) Pursuant to 40 CFR 63.6(e), the Permittee of an affected source is required to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

(1) Pursuant to 40 CFR 63.6(e)(3), the Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

(2) Pursuant to 40 CFR 63.10(d)(5)(I) if actions taken by a Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a

malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the owner/operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half; and

(3) Any time an action taken by a Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR 63.10(d)(5)(ii).

(d) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

## SECTION D.7 FACILITY OPERATION CONDITIONS

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

**(g) Utilities comprised of the following facilities, process equipment, and operational practices:**

(1) No. 5 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stacks S8C/D, installed in 1952.

(2) No. 6 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8E, installed in 1956.

(3) No. 7 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8F, installed in 1956

(4) No. 8 Boiler, with a heat input rate of 1090 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8G, installed in 1967

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

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

D.7.1 Particulate Matter [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1(d)(Lake County PM10 Requirements) PM10 emissions from the Utilities operations shall not exceed the following:

(a) PM10 emissions from Boiler No. 5 (S8C/D) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(b) PM10 emissions from Boiler No. 6 (S8E) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(c) PM10 emissions from Boiler No. 7 (S8F) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(d) PM10 emissions from Boiler No. 8 (S8G) shall not exceed 0.066 lbs/ MMBtu and 61.59 pounds per hour

Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”.

D.7.2 Sulfur Dioxide ($SO_2$) [326 IAC 7-4-1.1]

Pursuant to 326 IAC 7-4-1.1(c)(14(A), the sulfur dioxide emission rate from these units shall be limited to the following:

(a) $SO_2$ emissions from Boiler No. 5 (S8C/D), shall not exceed 0.896 lbs/ MMBtu.

(b) $SO_2$ emissions from Boiler No. 6 (S8E), shall not exceed 0.896 lbs/ MMBtu.

(c) $SO_2$ emissions from Boiler No. 7 (S8F), shall not exceed 0.896 lbs/ MMBtu.

(d) $SO_2$ emissions from Boiler No. 8 (S8G), shall not exceed 0.896 lbs/ MMBtu.

(e) Total actual heat input from fuel oil and/or desulfurized coke oven gas usage at all boilers combined shall not exceed nine hundred ninety-three (993) million Btu per hour.

(f) Boilers shall be fired on fuel oil, blast furnace gas, desulfurized coke oven gas and natural gas only.

(g) Fuel oil burned shall not exceed one and three-tenths percent (1.3%) sulfur and one and thirty-five hundredths (1.35) pounds per million Btu.

D.7.3 PSD and Emissions Offset Credit Limits [326 IAC 2-2 and 326 IAC 2-3]

Pursuant to CP089-10842-00448 issued on February 2, 2000 to Ironside Energy, LLC, the existing Boiler No. 4 with a heat input rate of 260 MMBtu per hour, owned and operated by ISG-Indiana Harbor (formerly LTV) shall be permanently removed from service upon commercial operation of Boiler No. 9 to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD) not applicable. Boiler No. 4 was shutdown in 2001.

D.7.4 Nitrogen Oxide Reduction program for Specific Source Categories [326 IAC 10-3]

Pursuant to 326 IAC 10-3-3, beginning May 31, 2004, and each ozone control period thereafter, the Permittee shall comply with the following NOx emission limits:

(a) NOx emissions from any affected boiler subject to this rule shall be limited to seventeen-hundreds pound of NOx per million Btus (0.17 lbs/MMBtu) of heat input over the ozone control period, and

(b) Ensure that fifty percent (50%) of the heat input shall be derived from blast furnace gas averaged over the ozone control period.

(c) During periods of blast furnace reline, startup, and period of malfunction, the affected boilers shall not be required to meet the requirement to derive fifty percent (50%) of the heat input from blast furnace gas.

D.7.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

**Compliance Determination Requirements**

D.7.6 Nitrogen Oxide Reduction program for Specific Source Categories [326 IAC 10-3]

Beginning May 31, 2004, and each ozone control period thereafter, the Permittee shall meet the monitoring of 326 IAC 10-3-3(c). To comply with Condition D.7.4, for each affected boiler, the Permittee shall monitor fuel usage and the percentage heat input derived from each fuel combusted to demonstrate that greater than fifty percent (50%) of heat input is derived from blast furnace gas.

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

D.7.7 Sulfur Dioxide (SO2) Sampling and Analysis [326 IAC 7-4-1.1(d)]

Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.7.2, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(a) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(b) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source's operation permit per procedures specified in 326 IAC 2.

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

D.7.8 Record Keeping Requirements

(a) To document compliance with Conditions D.7.2 and D.7.7, the Permittee shall maintain the following records:

(1) Records of the total coke oven gas, blast furnace gas, fuel oil, and natural gas usage for each day at the Nos. 5, 6, 7, and 8 Boilers.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

(b) Pursuant to 40 CFR 63.1(b)(3) and 40 CFR 63.10 (b)(3), in order to document exclusion from applicability to 40 CFR 63, Subpart DDDDD, the Permittee shall maintain records of fuel usage at boilers 5, 6, 7 and 8, ascertaining that on the annual basis the blast furnace gas usage at each boiler is greater than 90%. These records shall be kept for a period of five (5) years after the determination of exclusion, or until the source changes its operations to become an affected source, whichever comes first.

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

D.7.9 Reporting Requirements

The Permittee shall submit to the IDEM, OAQ, within thirty (30) days of the end of each calendar quarter the calculated sulfur dioxide emission rate in pounds per million Btu for each facility for each day during the calendar quarter and the total fuel usage for each type at each facility for each day. The summary of the information to document compliance with Condition D.7.8 (a), shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit.

**SECTION D.8 FACILITY OPERATION CONDITIONS**

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

**(h) Shops***

(1) Machine Shop

(2) Refrigeration Shop

(3) Electrical Shop

(4) Bridge Shop

(5) Pipe Shop

(6) Line Shop

(7) Fabrication Shop

(8) Carpenter shop

(9) Paint Shop and Paint Building

(10) Mason Shop

(11) Transportation Shop

(A) Gasoline Dispensing Facility with 10,000 gallon capacity Storage Tank (T4A22) (162, 504 gal/yr throughput), installed in 1988

(B) Two (2) Diesel Fuel Storage Tanks (T-4A7 & T- 4A8) with a 10,000 gallon storage capacity.

(12) Locomotive Shop including Railcar and Yard Storage

*the activities performed in the shops are listed in the insignificant activities

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

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

D.8.1 Gasoline Storage Tank Requirements [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6(b) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless such tank is equipped with the following:

(a) A submerged fill pipe.

(b) Either a pressure relief valve set to release at no less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.

(c) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.

D.8.2 Gasoline Dispensing Facility Requirements [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6 (e):

(a) No owner or operator of a gasoline dispensing facility shall cause or allow the dispensing of motor vehicle fuel at any time unless all motor vehicle fuel dispensing operations are

equipped with and utilize a certified vapor collection and control system which is properly installed and operated as follows:

(1) No vapor collection and control system shall be installed, used, or maintained unless the system has been certified by CARB and meets the testing requirements specified in 326 IAC 8-4-6 (k)(6).

(2) Any vapor collection and control system utilized shall be maintained in accordance to its certified configuration and with the manufacturer's specification and maintenance schedule.

(3) No elements or components of a vapor collection and control system shall be modified, removed, replaced, or otherwise rendered inoperative in a manner which prevents the system from performing in accordance with its certification and design specifications.

(b) One (1) operator or employee of the gasoline dispensing facility shall be trained and instructed annually in the proper operation and maintenance of a vapor collection and control system.

(c) Instructions shall be posted in a conspicuous and visible place within the motor vehicle fuel dispensing area for the system in use at that station. The instructions shall clearly describe how to fuel vehicles correctly with the vapor recovery nozzles utilized at that station. The instructions shall also include a warning that repeated attempts to continue dispensing motor vehicle fuel after the system has indicated that the vehicle fuel tank is full, may result in a spillage of fuel.

D.8.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for the two (2) 10,000 gallon Diesel Fuel Storage Tank (T-4A7 & T-4A8).

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

D.8.4 Gasoline Dispensing Facility Monitoring Requirements [326 IAC 8-4-6]

Pursuant to 326 IAC 8-4-6 (e):

(a) A vapor collection and control system shall not be operated with defective, malfunctioning, missing, or noncertified components. The following requirements apply to a vapor collection and control system:

(1) All parts of the system which can be visually inspected must be checked daily by the operator of the facility for the following malfunctions:

(A) Absence or disconnection of any component required to be used to certify the system.

(B) A vapor hose which is crimped or flattened such that the vapor passage is blocked or severely restricted.

(C) A nozzle boot which is torn in either of the following manners:

(i) A triangular shaped or similar tear one-half (½) inch or more to a side or a hole one-half (½) inch or more in diameter or length.

(ii) Slit one (1) inch or more in length.

(D) A faceplate or flexible cone which is damaged in the following manner:

(i) For balance nozzles and nozzles for aspirator and educator assist type systems, damage shall be such that the capability to achieve a seal with a fill pipe interface is affected for one-fourth (¼) of the circumference of the faceplate (accumulated).

(ii) For nozzles for vacuum assist type systems that use a flexible cone, having more than one-fourth (¼) of the flexible cone missing.

(E) A nozzle shutoff mechanism which malfunctions in any manner.

(F) A vacuum producing device which is inoperative.

(b) All vapor collection and control systems shall be retested for vapor leakage and blockage, and successfully pass the test, at least every five (5) years or upon major system replacement or modification. A major system modification is considered to be replacing, repairing, or upgrading seventy-five percent (75%) or more of a vapor collection and control system of a facility.

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

D.8.5 Record Keeping Requirements

(a) Pursuant to 326 IAC 8-4-6 (i), any gasoline dispensing facility subject to 326 IAC 8-4-6 (e) shall retain copies of all records and reports adequate to clearly demonstrate the following:

(1) That a certified vapor collection and control system has been installed and tested to verify its performance according to its specifications.

(2) That proper maintenance has been conducted in accordance with the manufacturer's specifications and requirements.

(3) The time period and duration of all malfunctions of the vapor collection and control system.

(4) The motor vehicle fuel throughput of the facility for each calendar month of the previous year.

(5) That operators and employees are trained and instructed in the proper operation and maintenance of the vapor collection and control system.

(c) All records and reports required in 326 IAC 8-4-6 (i) shall be made available to the agency upon request. All records shall be retained for a period of two (2) years

(c) Pursuant to 326 IAC 8-9, the Permittee must keep records of the following:

(1) The vessel identification number;

(2) The vessel dimensions; and

(3) The vessel capacity.

Records shall be maintained for the life of the vessel.

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

## SECTION D.9 FACILITY OPERATION CONDITIONS

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

**(i) Storage Vessels: (all tanks installed before 1975)**

(1) One (1) 400,000 gallon storage tank containing #6 fuel oil (T4F24)

(2) One (1) 70,000 gallon storage tank containing #6 fuel oil (T4A1)

(3) One (1) 25,000 gallon diesel fuel storage tank (T4A13)

(4) One (1) 2,000,000 gallon storage tank containing #6 fuel oil (T4A4)

(5) One (1) 200,000 gallon storage tank containing #6 fuel oil (T4A5)

(6) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4C9)

(7) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4A C10)

(8) Three (3) 5,000 gallon bleach storage tanks (TR-05, TR-06, TR-07)

(9) Two (2) 5,000 gallon storage tanks containing hydrochloric acid (HCl) (TR-22, TR-23)

(10) One (1) 5,000 gallon storage tanks containing ethylene glycol (T4E15)

(11) Two (2) 30,000 gallon storage tank containing hydrochloric acid (HCl) (T-238, T-239)

(12) One (1) 8,000 gallon diesel fuel tank (T-4F95)

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

### Emission Limitations and Standards

D.9.1 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all storage vessels containing No. 2 fuel oil, No. 6 fuel oil, diesel fuel, bleach and ethylene glycol.

D.9.2 NESHAP Operational and equipment standards [40 CFR 63.63.1159, Subpart CCC]

Hydrochloric acid storage vessels. Pursuant to 40 CFR 63.63.1159, Subpart CCC, the Permittee of an affected vessel shall provide and operate, except during loading and unloading of acid, a closed-vent system for each vessel. Loading and unloading shall be conducted either through enclosed lines or each point where the acid is exposed to the atmosphere shall be equipped with a local fume capture system, ventilated through an air pollution control device.

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

D.9.3 Monitoring Requirements [40 CFR 63.1162]

Pursuant to 40 CFR 63.1162, the Permittee of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.9.4 Record Keeping Requirements

Pursuant to 326 IAC 8-9, the Permittee must keep records of the following:

(a) The vessel identification number;

(b) The vessel dimensions; and

(c) The vessel capacity.

Records shall be maintained for the life of the vessel.

**SECTION D.10 FACILITY OPERATION CONDITIONS**

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

**Insignificant Activities:**

(a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]

(b) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. [326 IAC 8-9-1]

(c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-1-2]

(e) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-1-2]

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

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

D.10.1 Nonattainment Area Particulate Limitations [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

D.10.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all stationary vessels used to store volatile organic liquids.

D.10.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer

it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.10.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{O}$C) (one hundred degrees Fahrenheit (100$^{O}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{O}$C) (one hundred twenty degrees Fahrenheit (120$^{O}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

**Compliance Determination Requirement**

D.10.5 Particulate Control

In order to comply with D.10.1, the control equipment for particulate control shall be in operation and control emissions from the grinding and machining operations at all times that the grinding and machining operations are in operation.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

D.10.6 Record Keeping Requirements

Pursuant to 326 IAC 8-9, the Permittee must keep records of the following:

(a) The vessel identification number;

(b) The vessel dimensions; and

(c) The vessel capacity.

Records shall be maintained for the life of the vessel

D.10.7 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers)

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

(a) On and after November 1, 1999, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) On and after May 1, 2001, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:

(1) The name and address of the solvent supplier.

(2) The date of purchase.

(3) The type of solvent.

(4) The volume of each unit of solvent.

(5) The total volume of the solvent.

(6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(d) All records required by 326 IAC 8-3-8 (d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

**SECTION D.11 FACILITY OPERATION CONDITIONS**

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

**Fugitive Dust Sources consisting of, but not limited to the following:**

(1) Paved Roads and Parking Lots

(2) Unpaved Roads and Parking Lots

(3) Batch Transfer-Loading and Unloading Operations

(4) Continuous Transfer In and Out of Storage Piles

(5) Batch Transfer Operations-Slag and Kish Handling

(6) Wind Erosion from Storage Piles and Open Areas

(7) In Plant Transfer by Truck or Rail

(8) In Plant Transfer by Front End Loader or Skip Hoist

(9) Material Processing Facility (except Crusher Fugitive Emissions)

(10) Crusher Fugitive Emissions

(11) Material Processing Facility Building Openings

(12) Dust Handling Equipment

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

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

D.11.1 Particulate Matter (PM)[326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the opacity limits specified in Section C-Fugitive Dust Emissions shall be achieved by controlling fugitive particulate matter emissions according to the revised Fugitive Dust Control Plan (FDCP). If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

**Compliance Determination Requirements**

D.11.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), opacity from the activities shall be determined as follows:

(a) Paved Roads and Parking Lots
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

(1) The first will be taken at the time of emission generation.

(2) The second will be taken five (5) seconds later.

(3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

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

(b) Unpaved Roads and Parking Lots
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.

(c) Batch Transfer
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.

(d) Continuous Transfer
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.

(e) Wind Erosion from Storage Piles
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plum and at approximately right angles to the plume. The limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.

(f) Wind Erosion from Exposed Areas
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

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

(h) Material Transported by Front End Loader or Skip Hoist
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:

(1) The first will be taken at the time of emission generation.

(2) The second will be taken five (5) seconds later.

(3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

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

(i) Material Processing Limitations
Compliance with all opacity limitations from material processing equipment shall be

determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

(j) Dust Handling Equipment
Compliance with this standard shall be determined by 40 CFR 60, Appendix A, Method 9.

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

D.11.3 Record Keeping Requirements

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements):

(a) The source shall keep the following documentation to show compliance with each of its control measures and control practices:

(1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.

(2) For each application of water or chemical solution to roadways, the following shall be recorded:

(A) The name and location of the roadway controlled

(B) Application rate

(C) Time of each application

(D) Width of each application

(E) Identification of each method of application

(F) Total quantity of water or chemical used for each application

(G) For each application of chemical solution, the concentration and identity of the chemical

(H) The material data safety sheets for each chemical

(3) For application of physical or chemical control agents not covered by 326 IAC 6-1-11.1(B), the following:

(A) The name of the agent

(B) Location of application

(C) Application rate

(D) Total quantity of agent used

(E) If diluted, percent of concentration

(F) The material data safety sheets for each chemical

(4) A log recording incidents when control measures were not used and a statement of explanation.

(5) Copies of all records required by this section shall be submitted to the department

within twenty (20) working days of a written request by the department.

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

D.11.4 Reporting Requirements

(a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), a quarterly report shall be submitted, stating the following:

(1) The dates any required control measures were not implemented

(2 ) A listing of those control measures

(3) The reasons that the control measures were not implemented

(4) Any corrective action taken

(b) The Permittee shall submit to the IDEM, OAQ, within thirty (30) days of the end of each calendar quarter, the quarterly report in accordance with Section C – General Reporting Requirements of this permit.

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
# OFFICE OF AIR QUALITY

## PART 70 OPERATING PERMIT
## CERTIFICATION

Source Name: ISG Indiana Harbor Inc.
Source Address: 3001 Dickey Road, East Chicago 46312
Mailing Address: 3250 Interstate Drive, 2nd Floor, Richfield, OH 44286-9000
Part 70 Permit No.: T089-7099-00318

**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 BRANCH**
**100 North Senate Avenue**
**P.O. Box 6015**
**Indianapolis, Indiana 46206-6015**
**Phone: 317-233-5674**
**Fax: 317-233-5967**

## PART 70 OPERATING PERMIT
## EMERGENCY OCCURRENCE REPORT

| | |
|---|---|
| Source Name: | ISG Indiana Harbor Inc. |
| Source Address: | 3001 Dickey Road, East Chicago 46312 |
| Mailing Address: | 3250 Interstate Drive, 2nd Floor, Richfield, OH 44286-9000 |
| Part 70 Permit No.: | T089-7099-00318 |

**This form consists of 2 pages** **Page 1 of 2**

**9** This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

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

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

If any of the following are not applicable, mark N/A **Page 2 of 2**

| |
|---|
| Date/Time Emergency started: |
| Date/Time Emergency was corrected: |
| Was the facility being properly operated at the time of the emergency? Y N |
| Type of Pollutants Emitted: TSP, PM-10, $SO_2$, VOC, $NO_X$, CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Form Completed by:

Title / Position:

Date:

Phone:

A certification is not required for this report.

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

## PART 70 OPERATING PERMIT
## SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: ISG Indiana Harbor Inc.
Source Address: 3001 Dickey Road, East Chicago 46312
Mailing Address: 3250 Interstate Drive, 2nd Floor, Richfield, OH 44286-9000
Part 70 Permit No.: T089-7099-00318

| |
|---|
| Natural Gas Only<br>Alternate Fuel burned<br>From:___ To:_ |

| |
|---|
| I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.<br><br>Signature: |
| Printed Name: |
| Title/Position: |
| Phone: |
| Date: |

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

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

## PART 70 OPERATING PERMIT
### QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: ISG Indiana Harbor Inc.
Source Address: 3001 Dickey Road, East Chicago 46312
Mailing Address: 3250 Interstate Drive, 2nd Floor, Richfield, OH 44286-9000
Part 70 Permit No.: T089-7099-00318

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



| | |
|---|---|
| This report shall be submitted quarterly based on a calendar year. 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". | |
| NO DEVIATIONS OCCURRED THIS REPORTING PERIOD. | |
| 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:

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management
# Office of Air Quality

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

**Source Background and Description**

| | |
|---|---|
| Source Name: | ISG-Indiana Harbor Inc. |
| Source Location: | 3001 Dickey Road, East Chicago, Indiana 46312-1610 |
| County: | Lake |
| SIC Code: | 3312 |
| Operation Permit No.: | T089-7099-00318 |
| Permit Reviewer: | Teresa Freeman |

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from ISG-Indiana Harbor Inc. relating to the operation of a stationary integrated steel mill and finishing facility.

**Source Definition**

ISG-Indiana Harbor Inc. is an integrated steel mill consisting of a source with on-site contractors:

(a) ISG-Indiana Harbor Inc. (Plant ID 089-00318), the primary operation, is located at, 3001 Dickey Road, East Chicago, Indiana and

(b) Oil Tech, Inc (Plant ID 089-00375), the on-site contractor (a used oil recycling facility), is located at, East Chicago, Indiana;

(c) International Mill Service (Plant ID 089-00353), the on-site contractor (a steel slab scarfer) is located 3001 Dickey Road, East Chicago, Indiana;

(d) Edward Levy (Plant ID 089-00339), the on-site contractor (a steel slag processing facility), is located at 3001 Dickey Road, East Chicago, Indiana;

(e) Ironside Energy (Plant ID 089-00448), the on-site contractor (an industrial steam and electric power cogeneration plant), is located at 3001 Dickey Road, East Chicago, Indiana

(f) Heckett Multiserv (Plant ID 089-00341), the on-site contractor (a slag and kish processing plant), is located at East Chicago, Indiana;

IDEM has determined that ISG-Indiana Harbor Inc. and each of the on-site contractors are under the common control of ISG-Indiana Harbor Inc. These plants are considered one source due to contractual control. Therefore, the term “source” in the Part 70 documents refers to both ISG-Indiana Harbor Inc. and the on-site contractors as one source.

Separate Part 70 permits will be issued to ISG-Indiana Harbor Inc. and each on-site contractor, solely for administrative purposes.

| Company Name | TV Permit Number |
|---|---|
| ISG-Indiana Harbor, Inc. | 089-7099-00318 |
| Oil Technology | 089-7517-00375 |
| International Mill Service | 089-7562-00353 |
| Edward Levy | 089-6260-00339 |
| Ironside Energy | 089-11557-00448 |
| Heckett Multiserv | 089-7066-00341 |

**Permitted Emission Units and Pollution Control Equipment**

ISG-Indiana Harbor Inc. consists of the following permitted emission units and pollution control devices:

**(a) Two (2) Blast Furnaces, designated as Blast Furnace No. 3 and Blast Furnace No. 4, comprised of the following facilities, process equipment, and operational practices:**

(1) No. 3 Blast Furnace, with a maximum capacity of 4,555,200 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower, with excess gas exhausting through a flare at stack (S1E); installed in 1953.

(2) No. 3 Blast Furnace Stoves, designated as stoves 31, 32, and 33, exhausting to the combustion stack (S1A) with a heat input rate of 441 MMBtu/hr and installed in 1953

(3) No. 3 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 3 Blast Furnace Casthouse Roof Monitor (V1A);

(4) No. 4 Blast Furnace, with a maximum capacity of 5,490,836 tons raw material per year, including an integral gas cleaning system consisting of a dust catcher, separator, two scrubbers (primary and secondary) and one cooling tower with excess gas exhausting through a flare at stack-(S1D); installed in 1967

(5) No. 4 Blast Furnace Stoves, designated as stoves 41, 42, and 43, exhausting to the combustion stack (S1C) with a heat input rate of 486 MMBtu/hr and installed in 1967

(6) No. 4 Blast Furnace Casthouse with Passive Emission Control (PEC) to suppress fumes in the casthouse, consisting of slag and iron runner covers along with natural gas flame suppression exhausting to the No. 4 Blast Furnace Casthouse Roof Monitor (V1B)

(7) No. 4 Blast Furnace Casthouse Baghouse used to control emissions from the casthouse with an airflow rate of 147,000 acfm exhausting at stack (S1B) when operating one (1) fan. No. 4 Blast Furnace Casthouse Baghouse has an air flow rate of 240,000 acfm when operating two (2) fans.

(8) Miscellaneous equipment for handling of raw materials, including but not limited to, coke, iron ore pellets, limestone, slag and sinter.

**(b) One (1) Sinter Plant with a maximum raw material usage rate of 2,592,782 tons per year and a maximum annual production capacity of 2,119,920 tons of sinter per year,**

**comprised of the following facilities, fugitive sources, process equipment, and operational practices: (Installed in 1958)**

(1) Raw material handling area consisting of material feeders (storage bins), conveyors, a pug mill and hearth layer returns from screening that combines these aw materials to create a uniform mixed burden that is deposited on the sinter strand.

(2) One (1) natural gas fired ignition furnace used to ignite the surface of the mixed burden deposited on the sinter strand.

(3) One (1) sinter plant main windbox, with twenty-one (21) vacuum chambers and emissions controlled by drop- out boxes, multi-cyclones (6 units), settling chamber and a wet venturi scrubber (containing chevrons) having a flow rate of 335,000 acfm, exhausting to stack-(S2A)

(4) One (1) sinter plant discharge end (breaker), with a hood to capture light dust and controlled by a wet Venturi scrubber having a flow rate of 100,400 acfm, exhausting to stack (S2B)

(5) One (1) Sinter Cooler and sinter product screening station

**(c) Basic Oxygen Furnace (BOF) Shop, comprised of the following facilities, process equipment, and operational practices:**

(1) One (1) Hot Metal Reladle/Desulf Complex consisting of two (2) reladle stations, two (2) desulfurization stations and Two (2) slag skimming stations, installed in 1982, having a maximum capacity of 5,630,208 tons per year of hot metal and sulfur scavenger. Emissions from all stations are controlled by a baghouse, designated as Baghouse No. 1 with captured emissions exhausting to stack (S3B) and uncaptured/fugitive emissions exhausting through a roof monitor (V3B)

(2) One (1) Basic Oxygen Furnace (BOF) Complex, consisting of two (2) basic oxygen furnaces, designated as No. 1 and No. 2 Furnace, installed in 1968, having a combined maximum capacity of 7,456,512 tons of hot metal, flux, alloys, and scrap per year. Emissions from furnace operations such as charging, oxygen blowing and tapping are controlled by an electrostatic precipitator, with captured emissions exhausting to stack S3A and uncaptured/fugitive emissions exhausting through a roof monitor at vent V3A;

(3) One (1) Ladle Metallurgical Facility (LMF), installed in 1988, consisting of (2) heating stations, having a combined maximum capacity of 5,606,400 tons of hot metal, flux and alloys per year. Emissions from LMF operations such as argon stirring, heating, and alloy addition, are controlled by a baghouse, designated as Baghouse No. 5 (LMF), with captured emissions exhausting to stack (S3C) and uncaptured/fugitive emissions exhausting through a roof monitor at vent (V3C)

(4) One (1) Vacuum Degassing Facility (decarbonization), installed in 1988, with carbon monoxide (CO) emissions controlled by an integral CO scrubber and exhausting to the flare at stack (S3C)

(5) One (1) Continuous Casting Complex consisting of two (2) single–strand slab casting machines, each with its own ladle turrent, tundish and mold. Molten steel from the LMF is directed into the turrent than cooled in the mold to begin the solidification process. The steel continues to solidify as it passes through the water spray cooling system to produce slabs that are finally cut to length using an acetylene torch-cutting machine. Emissions from water-cooling are directed to stacks (S3E/F).

(6) Lime handling operations including trailer unloading and lime handling from silos with emissions captured by single compartment, 16 bag filter vents;

(7) Miscellaneous dust removal process consisting of recovered BOF ESP dust, baghouse dust, handling and conditioning equipment, silos and pug mill; (fugitives)

(8) Miscellaneous natural gas combustion consisting of ladle preheat, ladle drying, space heaters, tundish preheat and drying, tundish nozzle preheat, ladle shroud preheat, and slab torch cutting; and

(9) Miscellaneous material handling.

**(d) 84 Inch Hot Strip Mill, comprising the following facilities, process equipment, and operational practices:**

(1) Three (3) Reheat Furnaces identified as Nos. 1, 2 and 3, installed in 1968, having a heat input rate of 427 MMBtus per hour each.

(A) No. 1 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4A.

(B) No. 2 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4B.

(C) No. 3 Reheat Furnace, having the ability to burn natural gas and fuel oil with emissions exhausting through stack S4C.

(2) One (1) Hot Rolling Mill, where steel slabs from the reheat furnaces are converted to hot bands (steel coils). The mill consists of scale breakers, six (6) roughing stands, a crop shear, seven (7) finishing stands, a cooling table and three (3) downcoilers. The mill fugitive emissions from these processes vent inside the building (V4A).

(3) One (1), two (2) stand temper mill.

(4) Twenty-eight (28) natural gas space heaters having a combined heat input rate of 84 MMBtu/hr.

**(e) One (1) Sheet Mill Finishing operation, designated as No. 2 Sheet Mill, having a maximum capacity of 1,404,929 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) No. 1 Galvanizing Line (installed in 1959) consisting of:

(A) Flame Furnace having heat input rate of 18 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(B) Galvanize furnace having a heat input rate of 37 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(D) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(E) Hot air dryer exhausting to No. 2 Sheet Mill shop

(2) No. 2 Galvanizing Line (installed in 1988) consisting of:

(A) Flame Furnace having heat input rate of 150 MMBtu/hr with uncontrolled emissions exhausting through stack S5B.

(B) Galvanize furnace having a heat input rate of 54 MMBtu/hr with uncontrolled emissions exhausting through vent (V5A) to No. 2 Sheet Mill shop

(C) One (1) natural gas fired Edge Flame Burner on line No. 2, with uncontrolled emissions venting into the No. 2 Sheet Mill shop

(D) Zinc coating pot with uncontrolled fugitive emissions exhausting into the No. 2 Sheet Mill shop

(E) One (1) natural gas fired Selas Furnace, with uncontrolled emissions venting through vent (V5A) to No. 2 Sheet Mill shop

(F) Hot air dryers exhausting to No. 2 Sheet Mill shop

(G) Chromic Acid Bath with water vapor exhausting into the No. 2 Sheet Mill shop

(H) Temper Mill

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

(4) Two (2) natural gas fired boilers designated as Boiler No. 7 and Boiler No. 8 (installed in 1955), having a combined heat input of 98 MMBtu per hour, with uncontrolled emissions exhausting to (S5C)

(5) Seven (7) space heaters (installed in 1968) having a combined heat input of 17.5 MMBtu per hour, with uncontrolled emissions exhausting to vent (V5B) to No. 2 Sheet Mill shop.

**(f) One (1) Sheet Mill Finishing operation, designated as No. 3 Sheet Mill, having a maximum capacity of 2,156,537 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

(1) Seven (7) Single Stack Batch Annealing Furnaces (1-7) (installed in 1965), having a combined heat input of 24.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(2) Eleven (11) Four-Stack Batch Annealing Furnaces (1-11)(installed in 1966), having a combined heat input of 176 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(3) One (1) Four-Stack Batch Annealing Furnace (13) (installed in 1998) with a heat input capacity of 10 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(4) Three (3) Open Coil (Hydrogen) Annealing Furnaces (1-3), having a combined heat input of 10.5 MMBtu per hour, with uncontrolled emissions exhausting inside the building to vent (V6A)

(5) One (1) Pickle Line consisting of four (4) HCI process tanks and one (1) water rinse tank (installed in 1964), with acid fumes controlled by a scrubber system (14,000 acfm) comprised of tank hoods and ductwork connected to two (2) scrubbers (in series) exhausting through scrubber stack (S6A)

(6) One (1) Shot Blaster, used to put a matte finish on the surface of reconditioned rolls. Emissions are controlled by a small baghouse exhausting through vent (V6B) outside the building.

(7) One (1) tempering operation consisting of a 2-Stand Temper Mill with fugitive emissions exhausting inside the building.

(8) One (1) steel coil cold reduction operation consisting of one (1) 5- Stand Tandem Mill where steel coil thickness is reduced to final specification, with emissions exhausting through stack (S6B)

(9) Miscellaneous activities include two (2) steel sheet edge slitters, electrostatic oiling space heating and portable heating (to prevent equipment freezing).

**(g) Utilities comprised of the following facilities, process equipment, and operational practices:**

(1) No. 5 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stacks S8C/D, installed in 1952.

(2) No. 6 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8E, installed in 1956.

(3) No. 7 Boiler, with a heat input rate of 454 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8F, installed in 1956

(4) No. 8 Boiler, with a heat input rate of 1090 MMBtu/hr fired by blast furnace gas, natural gas and No. 6 fuel oil exhausting through stack S8G, installed in 1967

**(h) Shops***

(1) Machine Shop

(2) Refrigeration Shop

(3) Electrical Shop

(4) Bridge Shop

(5) Pipe Shop

(6) Line Shop

(7) Fabrication Shop

(8) Carpenter shop

(9) Paint Shop and Paint Building

(10) Mason Shop

(11) Transportation Shop

(A) Gasoline Dispensing Facility with 10,000 gallon capacity Storage Tank (T4A22) (162, 504 gal/yr throughput), installed in 1988

(B) One (1) Diesel Fuel Storage Tank (T4A13) with a 25,000 gallon storage capacity

(12) Locomotive Shop including Railcar and Yard Storage

*the activities performed in the shops are listed in the insignificant activities

**(i) Storage Vessels: (all tanks installed before 1975)**

(1) One (1) 400,000 gallon storage tank containing #6 fuel oil (T4F24)

(2) One (1) 70,000 gallon storage tank containing #2 fuel oil (T4A1)

(3) One (1) 25,000 gallon diesel fuel storage tank (T4A13)

(4) One (1) 2,000,000 gallon storage tank containing #6 fuel oil (T4A4)

(5) One (1) 200,000 gallon storage tank containing #6 fuel oil (T4A5)

(6) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4C9)

(7) One (1) 3,400,000 gallon storage tank containing #6 fuel oil (T4A C10)

(8) Three (3) 5,000 gallon bleach storage tanks (TR-05, TR-06, TR-07)

(9) Two (2) 5,000 gallon storage tanks containing hydrochloric acid (HCl) (TR-22, TR-23)

(10) One (1) 5,000 gallon storage tanks containing ethylene glycol (T4E15)

(11) Two (2) 30,000 gallon storage tank containing hydrochloric acid (HCl) (T-238, T-239)

**Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at ISG-Indiana Harbor Inc. during this review process.

**Insignificant Activities**

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

(a) Space heaters, process heaters, or boilers using the following fuels:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(b) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(c) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) Refractory storage not requiring air pollution control equipment.

(e) Equipment used exclusively for the following:

(1) Packaging lubricants or greases.

(2) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.

(f) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.

(g) Machining where an aqueous cutting coolant continuously floods the machining interface.

(h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(i) 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; 5mm Hg; or 0.1 psi measured at 20 C (68 F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

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

(k) Closed loop heating and cooling systems.

(l) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (10) plate or equivalent.

(2) Using 80 tons or less of welding consumables.

(m) Rolling oil recovery systems.

(n) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(o) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.

(p) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(q) Noncontact cooling tower systems with either of the following:

(1) Forced and induced draft cooling tower system not regulated under a NESHAP.

(r) Quenching operations used with heat treating processes.

(s) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(t) Heat exchanger cleaning and repair.

(u) Process vessel degreasing and cleaning to prepare for internal repairs.

(v) Stockpiled soils from soil remediation activities that are covered and waiting transportation for disposal.

(w) Paved and unpaved roads and parking lots with public access.

(x) Purging of gas lines and vessels that is related to routing maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(y) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(z) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(aa) Furnaces used for melting metals other than beryllium with a brim full capacity of less than or equal to 450 cubic inches by volume.

(bb) On-site fire and emergency response training approved by the department.

(cc) Emergency generators as follows:

(1) Gasoline generators not exceeding 110 horsepower.

(2) Diesel generators not exceeding 1600 horsepower.

(dd) Other emergency equipment as follows:

(1) Stationary fire pumps.

(ee) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(ff) Purge double block and bleed valves.

(gg) A laboratory as defined in 326 IAC 2-7-1(21)(D)

**Existing Approvals**

ISG-Indiana Harbor Inc. has been operating under previous approvals including, but not limited to, the following:

(a) PC (45) 1702 issued on August 4, 1988

(b) CP 089-3616-00318, Registered Construction and Operation status issued on April 26, 1994.

(c) CP 089-4578-00318, Exempt Construction and Operation Status issued on June 16, 1995.

(d) CP 089-9319-00318, Registered Construction and Operation status issued on February 23, 1998.

(e) A089-15865-00318, Administrative Amendment issued on May 2, 2002.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

Pursuant to CP 089-9319-00318 and 326 IAC 6-3 (process Operations), the one (1) 10 MMBtu per hour four-stack anneal furnace shall comply with 326 IAC 6-3-2(c) using the following equation:

$E=4.10P^{0.67}$ where: E=rate of emission in pounds per hour,
P=process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr

Reason not incorporated: 326 IAC 6-3 does not apply to sources and facilities located in Lake County with potential to emit (PTE) of PM greater than 100 tpy and actual emissions of PM greater than 10 tpy. As this source has PTE greater than 100 tpy, a new PM emissions limit is as follows: Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the 10 MMBtu per hour four-stack annealing furnace shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

**Enforcement Issue**

ISG-Indiana Harbor, Inc. has the following enforcement actions pending:

(1) IDEM sent a Notice of Violation on July 8, 2003 for the following violations that were referred for enforcement:

(a) 326 IAC 5-1-2, Opacity limit exceeded at H-3 Blast Furnace casthouse on January 2, 2003

(b) 326 IAC 5-1-2, Opacity limit exceed at H-3 Blast Furnace casthouse roof monitor on April 2,2003

(c) 326 IAC 6-4, Fugitive Dust Emissions violation from BOF dust catcher

(2) U.S. EPA has issued a Finding of Violation (FOV) on December 20, 2001 alleging that ISG-Indiana Harbor Inc., is violating the following:

(a) On December 6, 2002, ISG- Indiana Harbor, Inc. emitted from its 66” Pickle Line (No. 2 Sheet Mill Pickle Line), hydrochloric acid at a level of 72.6 ppmv. This is a violation of 40 CFR Part 63.1157(a)(1) which states that no owner or operator of an existing source shall discharge into the atmosphere any gases that contain HCl in a concentration greater than 18 ppmv.

(b) The following will be placed in the permit:

(1) Within thirty (30) days after issuance of this permit, the Permittee shall submit initial notification and notifications of compliance status required by 40 CFR Part 63.9.

(2) Pursuant to 40 CFR Part 63.1157(a)(1), the Permittee shall not cause or allow to be discharged in the atmosphere from the affected hydrochloric acid regeneration plant, any gases that contain HCl in a concentration in excess of 18 ppmv. The IDEM has information that indicates that the Permittee is not in compliance with this applicable requirement. The IDEM OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 40 CFR Part 63.1157(b)(1) and a schedule for achieving compliance with such requirements.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 permit 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 administratively complete Part 70 permit application for the purposes of this review was received November 6, 1996.

**Potential To Emit**

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

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|---|---|
| PM | greater than 100 |
| PM-10 | greater than 100 |
| $SO_2$ | greater than 100 |
| VOC | greater than 25 |
| CO | greater than 100 |
| $NO_x$ | greater than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, $SO_2$, CO and $NO_x$ are equal to or greater than 100 tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and

Emission Offset applicability.

**Actual Emissions**

The following table shows the actual emissions from ISG-Indiana Harbor Inc. This information reflects the 2001 OAQ emission data.

| Pollutant | Emissions (tons/year) |
|---|---|
| PM | 1,534 |
| PM-10 | 1,534 |
| $SO_2$ | 5,359 |
| VOC | 247 |
| CO | 17,707 |
| NOx | 4,536 |
| HAPs | greater than 25 |

**County Attainment Status**

The source is located in Lake County.

| Pollutant | Status |
|---|---|
| PM-10 | Moderate nonattainment* |
| $SO_2$ | Marginal Nonattainment |
| $NO_2$ | Attainment |
| Ozone | Severe Nonattainment |
| CO | Attainment |
| Lead | Attainment or unclassifiable |

*Lake County has been federally redesignated in 40 CFR 81.315 as attainment for PM10. The Air Pollution Control Board will be making the same redesignation in state rules.

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

(b) Lake County has been classified as nonattainment for PM10 (see table above) and SO2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

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

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

**Part 70 Permit Conditions**

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance

of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Federal Rule Applicability**

(a) The construction for the BOF shop commenced prior to June 11, 1973. Therefore this shop is not subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60 Subpart N) because it was constructed before the applicability date for this rule.

(b) New Source Performance Standard, 326 IAC 12, (40 CFR 60.40, Subpart D) (40 CFR 60.40b, Subpart Db) or (40 CFR 60.40c, Subpart Dc) do not apply to the natural gas fired boilers designated as Boiler No. 7 and Boiler No. 8 at the No.2 Sheet Mill, because they were constructed in 1955 or the Utility Boilers No. 5 because it was constructed in 1952, Utility Boiler No. 6 because it was constructed in 1956, Utility Boiler No. 7 because it was constructed in 1956 or Utility Boiler No. 8 because it was constructed in 1967. All of which were constructed prior to the earliest date of August 17, 1971, the effective date of Subpart D.

(c) The storage vessels (T4F24, T4A1, T4A13, T4A4, T4A5, T4C9, T4A C10, TR-05, TR-06, TR-07, TR-22, TR-23, T4E15 T-238 and T-239) are not subject to 40 CFR 60.110, Subpart K-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978 because they are not used to store petroleum liquid as defined in 40 CFR 60.111, Subpart K.

(d) The storage vessels (T4F24, T4A1, T4A13, T4A4, T4A5, T4C9, T4A C10, TR-05, TR-06, TR-07, TR-22, TR-23, T4E15 T-238 and T-239) are not subject to 40 CFR 60.110a, Subpart Ka-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23,1984 because the tanks were built prior to May 18,1978.

(e) The 10,000 gallon storage tank (T4A22) is not subject to 40 CFR 60.110a, Subpart Ka-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, although the tanks were built after May 18,1978, the volume is less than 40 cubic meters (10,567 gallons).

(f) The 25,000 gallon Diesel Fuel Storage Tank (T4A13) is not subject to 40 CFR 60.110a, Subpart Ka-Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, because they are not used to store petroleum liquid as defined in 40 CFR 60.111a, Subpart Ka.

(g) The storage vessels (T4F24, T4A1, T4A13, T4A4, T4A5, T4C9, T4A C10, TR-05, TR-06, TR-07, TR-22, TR-23, T4E15 T-238 and T-239) are not subject to 40 CFR 60.110b, Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) because the tanks were built prior to July 23, 1984.

(h) The No. 2 Sheet Mill Pickling Line (S5A) and No. 3 Sheet Mill Pickling Line (S6A) are subject to National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCI Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) and shall comply with the following requirements:

(1) The Permittee shall not cause or allow to be discharged into the atmosphere from

the affected pickling line:

(A) Any gases that contain HCI in a concentration in excess of 18 ppmv; or

(B) HCI at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

(2) The Permittee shall comply with the operation and maintenance requirements of 40 CFR Part 63.6(e) (Subpart A, General Provisions) at the No. 2 Sheet Mill Pickling Line (S5A) and No. 3 Sheet Mill Pickling Line (S6A). Additionally, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Title V Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:

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

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

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

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

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

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

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

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

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

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

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

(9) The Permittee shall maintain a record of each inspection, including each item identified in 40 CFR Part 63.6(e), that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the

date of the repair, replacement, or other corrective action taken.

(i) The two (2) 5,000 gallon HCl storage vessels (TR-22, TR-23) and the two (2) 30,000 gallon HCl storage tanks (T-238, T-239) are subject to National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCI Process Facilities and Hydrochloric Acid Regeneration Plants (40 CFR Part 63, Subpart CCC) and shall comply with the following requirements:

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

(j) The source is subject to 40 CFR 63, Subpart FFFFF - National Emissions Standards for Hazardous Air pollutants from Integrated Iron and Steel Manufacturing. The Permittee owns and operates an integrated iron and steel manufacturing facility that is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs). 40 CFR 63, Subpart FFFFF covers emissions from the sinter plant windbox exhaust, discharge end, sinter cooler, the blast furnace casthouse, the BOPF shop including individual BOPF and shop ancilllary operations (hot metal transfer, hot metal desulfurization, slag skimming and ladle metallurgy). The Permittee shall comply with applicable requirements on and after May 20, 2003.

(k) 40 CFR 63.52(e) (Application Requirements for Section 112(j) of the Clean Air Act)

(1) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are applicable to this source because the source is a major source of HAPs (i.e., the source has the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) and the source includes one or more units that belong to one or more source categories affected by the Section 112(j) Maximum Achievable Control Technology (MACT) Hammer date of May 15, 2002.

(A) This rule requires the source to:

(i) Submit a Part 1 MACT Application by May 15, 2002; and

(ii) Submit a Part 2 MACT Application for each affected source category in accordance with the appropriate Part 2 MACT Application deadline listed in Table 1 to 40 CFR 63, Subpart B for the affected source category.

(B) The Permittee submitted a Part 1 MACT Application on May 15, 2002.

(C) Pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The MACT and the General Provisions of 40 CFR 63, Subpart A will become new applicable requirements, as defined by 326 IAC 2-7-1(6), that must be incorporated into the Part 70 permit. After IDEM, OAQ receives the initial notification,

any of the following will occur:

(i) If three or more years remain on the Part 70 permit term at the time the MACT is promulgated, IDEM, OAQ will notify the source that IDEM, OAQ will reopen the permit to include the MACT requirements pursuant to 326 IAC 2-7-9; or

(ii) If less than three years remain on the Part 70 permit term at the time the MACT is promulgated, the Permittee must include information regarding the MACT in the renewal application, including the information required in 326 IAC 2-7-4(c); or

(iii) The Permittee may submit an application for a significant permit modification under 326 IAC 2-7-12 to incorporate the MACT requirements. The application may include information regarding which portions of the MACT are applicable to the emission units at the source and which compliance options will be followed.

**State Rule Applicability - Entire Source**

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on November 6, 1996. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset)

This source is a major stationary source because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year (Lake County) of PM10. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

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

(a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from the new emission unit stacks and fugitive sources shall not exceed the following limitations:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road

shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero percent (0%) frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The $PM_{10}$ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute opacity standard.

(l) $PM_{10}$ emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity.

(m) Fugitive particulate matter from the material processing facilities shall not exceed ten percent (10%) opacity.

Material processing facilities include crushers, screens, grinders, mixers, dryers, belt conveyors, bucket elevators, bagging operations, storage bins, and truck or railroad car loading stations.

The Permittee shall achieve compliance with these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on December 20, 1993.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

The source is subject to 326 IAC 6-1-11.2 because it is subject to the requirements of 326 IAC 6-1-11.1 and 326 IAC 6-1-10.1(d). Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q) of this rule.

326 IAC 6-3 (Particulate Emissions Limitations for Process Operations)

The source is not subject to the requirements of 326 IAC 6-3 because the equipment at this source is subject to the requirements of 326 IAC 6-1 (Nonattainment Particulate Emission Limitations). Pursuant to the applicability requirements (326 IAC 6-3-1(b)), if any limitation established by this rule is inconsistent with applicable limitations contained in 326 IAC 6-1 (Nonattainment Particulate Emission Limitations) or 326 IAC 12 (New Source Performance Standards), then the limitations contained in 326 IAC 6-1 or 326 IAC 12 prevail.

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).

**State Rule Applicability - Individual Facilities**

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

The following limit(s) and conditions will maintain emissions below 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) level requirements:

(a) Pursuant to Construction Permit PC (45) 1702, issued August 4, 1988:

(1) NOx emissions from the No. 2 Galvanizing Line Flame Furnace (S5B) shall be limited to 550 pounds per MMCF of natural gas and 361.35 tons per year.

(2) the permanent shutdown in 1984 of 10 soaking pit sets, No. 2 slab mill, rated at 90 MMBtu/hr per set, and actual 1983 emissions based on 2,446 million cubic feet per year of natural gas usage.

(3) the permanent shutdown in 1984 of the No. 2 High pressure boiler, rated at 190 MMBtu/hr and actual 1984 emissions based on 449 million cubic feet per year of natural gas and 86,000 gallon per year No. 6 fuel oil.

(4) the visible emissions from the No. 2 Galvanizing Line Flame Furnace (S5B) shall be limited to 5% opacity, 6-minute average.

(b) Pursuant to CP089-10842-00448 issued on February 2, 2000 to Ironside Energy, LLC., the existing Boiler No. 4 with a heat input rate of 260 MMBtu per hour, which was owned and operated by ISG-Indiana Harbor (formerly LTV) shall be permanently removed from service upon beginning of commercial operation of Boiler No. 9 to render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-2 (PSD) not applicable. Boiler No. 4 was permanently shutdown in 2001.

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

(a) Pursuant 326 IAC 6-1-2, No. 3 Blast Furnace Casthouse Roof Monitor (V1A), No. 4 Blast Furnace Casthouse Roof Monitor (V1B) and No. 4 Blast Furnace Casthouse Baghouse (S1B) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

(b) Pursuant to 326 IAC 6-1-2 the Hot Metal Reladle/Desulf Roof Monitor (V3B), BOF Roof Monitor (V3A) and LMF Roof Monitor (V3C) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

(c) Pursuant 326 IAC 6-1-2, the Pickle Line (S5A) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

(d) Pursuant 326 IAC 6-1-2, the Pickle Line (S6A), Shot Blaster (V6B), 2-Stand Temper Mill (S6B) and 5-Stand Tandem Mill (V6B) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.

(e) Pursuant to 326 IAC 6-1-2 (Nonattainment Area Particulate Limitations), the particulate matter emissions from the brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6-1-10.1 (Lake County PM10 Emission Requirements)

There are specific emissions limitations established in 326 IAC 6-1-10.1(d)(22) for the facilities in this permit. Each emission limit applies to one (1) stack serving one (1) facility unless otherwise noted. The emission limitations apply to one (1) stack serving the multiple units specified when the facility descriptions notes “stack serving”, and to each stack of multiple stacks serving multiple facilities when the facility description notes “each stack serving”. The requirements of 326 IAC 6-1-10.1 (d)(22) apply as follows:

(a) PM10 emissions from the stack serving No. 3 Blast Furnace Stoves (S1A) shall not exceed 0.027 lbs/MMBtu and 11.73 pounds PM10 per hour.

(b) PM10 emissions from the stack serving No. 4 Blast Furnace Stoves (S1C) shall not exceed 0.027 lbs/MMBtu and 12.93 pounds PM10 per hour.

(c) TSP emissions from the windbox exhausting to stack (S2A) (identified in 326 IAC 6-1-10.1(d) as “stack 08") shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 49.70 pounds per hour.

(d) TSP emissions from the sinter plant discharge (breaker) exhausting to stack (S2B) shall not shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 18.05 pounds per hour.

(e) PM10 emissions from the Reladle/desulfurization baghouse (Baghouse No.1) exhausting to stack (S3B) shall not exceed 0.008 grains PM10 per dry standard cubic foot of exhaust air and 10.49 pounds PM10 per hour.

(f) PM10 emissions from the electrostatic precipitator exhausting to stack (S3A) (BOF main stack) shall not exceed 0.018 grains PM10 per dry standard cubic foot of exhaust air and 69.40 pounds PM10 per hour.

(g) PM10 emissions from the ladle metallurgical facility baghouse (LMF Baghouse) exhausting to stack (S3C) shall not exceed 0.004 grains PM10 per dry standard cubic foot of exhaust air and 3.630 pounds PM10 per hour.

(h) PM10 emissions from each of the stacks serving the three (3) natural gas/fuel oil furnaces (S4A, S4B and S4C) shall be limited 0.086 lbs/MMBtu and 36.56 pounds PM10 emitted per hour.

(i) PM10 emissions from Boiler No. 5 (S8C/D) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(j) PM10 emissions from Boiler No. 6 (S8E) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(k) PM10 emissions from Boiler No. 7 (S8F) shall not exceed 0.066 lbs/ MMBtu and 25.69 pounds per hour

(l) PM10 emissions from Boiler No. 8 (S8G) shall not exceed 0.066 lbs/ MMBtu and 61.59 pounds per hour

326 IAC 6-1-10.1(e) (Opacity)

The following opacity limits shall be complied with and shall take precedence over those in 326 IAC 5-1-2 with which they conflict.

(a) Visible emissions from the reladle/desulfurization baghouse (stack S3B) shall not exceed five percent (5%) opacity, three (3) minute average.

(b) Visible emissions from the basic oxygen furnace main electrostatic precipitator stack (stack

S3A) shall not exceed twenty percent (20%) opacity, six (6) minute average.

(c) Visible emissions from the basic oxygen furnace roof monitor (vent V3A) shall not exceed twenty percent (20%) opacity, three (3) minute average.

(d) Visible emissions from the ladle metallurgical facility (LMF) baghouse (stack S3C) shall not exceed five percent (5%) opacity, three (3) minute average.

326 IAC 6-1-10.1(h) (Particulate Matter)

Pursuant to 326 IAC 6-1-10.1(h)(14), the following combustion sources shall fire natural gas only:

(a) The allowable TSP emissions from the twenty-eight (28) natural gas space heater (V4A) shall not exceed 0.003 lbs/MMBtu and 0.250 pounds of TSP emissions per hour period combined and burn natural gas only.

(b) The total suspended particulate emissions from the No. 1 Galvanizing Line Galvanizer Furnace (V5A) and No. 2 Galvanizing Line Galvanizer Furnace (V5B) shall not exceed 0.003 pounds per MMBtu and 0.265 pounds of TSP per one (1) hour period combined.

(c) The particulate matter ($PM_{10}$) emissions from the No. 1 Galvanizing Line Flame Furnace (V5A) and No. 2 Galvanizing Line Flame Furnace (S5B) shall not exceed 0.003 pounds per MMBtu and 0.500 pounds of particulate matter emissions per one (1) hour period combined.

(d) The total suspended particulate emissions from Boiler No. 7 and Boiler No. 8 (S5C) at No. 2 sheet mill shall not exceed 0.003 pounds per MMBtu and 0.290 pounds of TSP emissions per one (1) hour period combined.

(e) The total suspended particulate emissions from the seven (7) space heaters (V5B) at No. 2 sheet mill shall not exceed 0.003 pounds per MMBtu and 0.050 pounds of TSP emissions per one (1) hour period combined.

(f) The total suspended particulate emissions from the seven (7) single stack batch annealing furnaces (V6A) at No. 3 sheet mill shall not exceed 0.003 pounds per MMBtu and 0.071 pounds of TSP emissions per one (1) hour period combined.

(g) The total suspended particulate emissions from the eleven (11) multi-stack batch annealing furnaces (V6A) at No.3 sheet mill shall not exceed 0.003 pounds per MMBtu and 0.520 pounds of TSP emissions per one (1) hour period combined.

(h) The total suspended particulate emissions from the three (3) open coil (hydrogen) annealing furnaces (V6A) at No. 3 sheet mill shall not exceed 0.003 pounds per MMBtu and 0.031 pounds of TSP emissions per one (1) hour period combined.

326 IAC 6-1-10.1(g)(2) Opacity Continuous Emission Monitoring

Pursuant to 326 IAC 6-1-10.1(g)(2), the main basic oxygen furnace electrostatic precipitator stack shall be equipped with a Continuous Emission Monitoring (COM) for opacity. The COM shall comply with the maintenance, operating procedures, quality assurance procedures, and performance specifications in 326 IAC 3-5.

326 IAC 6-1-10.1 (Continuous Compliance Plan)

Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCPs were submitted to IDEM. The plans include the following:

(a) Pursuant to 326 IAC 6-1-10.1(p)(3)(C), the plans for iron production that includes, blast furnaces shall include the following:

(1) the capture system

(2) procedures used to minimize dirt and debris accumulated on the facility floor

(3) fume suppression system

(4) record keeping for the iron production cycle

(5) the blast furnace inspection, repair and maintenance schedule

(6) the procedures used to inspect and operate the blast furnace gas cleaning equipment

(b) Pursuant to 326 IAC 6-1-10.1(p)(3)(D), the plans for sinter production shall include the following:

(1) routine startup and shutdown procedures and other work practices which are followed to reduce emissions and equipment malfunctions.

(2) procedures for inspection of equipment to identify areas which may affect particulate emissions

(3) procedures for monitoring mechanical and electrical inspection records.

(4) procedures used to minimize dirt and debris accumulation on the facility floor

(5) procedures for monitoring burden parameters, including base to acid ratio and hydrocarbon content

(6) routine for plant operation during equipment failure, such as screening station failure

(7) inspect the operational status of the capture systems

(8) records of the inspections and any repairs.

(c) Pursuant to 326 IAC 6-1-10.1(p)(3)(A), the plans for the Basic oxygen process (BOP, BOF, QBOP) shall include the following:

(1) the capture and control devices

(2) fume suppression system

(3) procedure for recording furnace charging and tapping time, amount of throughput, and amount of steel produced

(4) the off-gas system leak detection and repair record keeping practices

(5) procedures used to minimize dirt and debris accumulation on the facility floor

(6) practices that reduce $PM_{10}$ and TSP emissions escaping the primary or secondary

hood during scrap charging and hot metal charging tapping steel and dumping slag

(7) the capture system

(d) Pursuant to 326 IAC 6-1-10.1(p)(4), the plans for the fuel combustion of fuels at reheat furnaces shall include the following:

(1) requirements of this subdivision shall not relax the fuel monitoring and reporting requirements of 326 IAC 7-1.1-1 for the sources this section applies to

(2) maintain records as required by 326 IAC 6-1-10.1(p)(4)(B)

(1) guidance found in 326 IAC 6-1-10.1(p)(4)(C) may be used to estimate emissions

(e) Pursuant to 326 IAC 6-1-10.1(p)(4), the plans for the Fuel combustion boilers shall include the following:

(1) requirements of this subdivision shall not relax the fuel monitoring and reporting requirements of 326 IAC 7-1.1-1 for the sources this section applies to

(2) maintain records as required by 326 IAC 6-1-10.1(p)(4)(B)

(3) guidance found in 326 IAC 6-1-10.1(p)(4)(C) may be used to estimate emissions

(f) Pursuant to 326 IAC 6-1-10.1(q), the plans for the particulate matter control equipment shall include operation and maintenance requirements

(g) a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures

(h) Pursuant to 326 IAC 6-1-10.1(r)(3), the plans for a facility controlled with a scrubber shall include the recording, inspection, and maintenance procedures

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Combustion facilities shall use natural gas as the only fuel, except as listed in 326 IAC 7-4-1.1 or an alternative SO2 limit is provided.

326 IAC 7-4-1.1

Pursuant to 326 IAC 7-4.1.1(c)(14), the sulfur dioxide emission rate from the equipment at this source shall not exceed the following:

(a) SO2 emissions from the stack serving No. 3 Blast Furnace Stoves (S1A) shall not exceed 0.024 lbs/MMBtu.

(b) SO2 emissions from the stack serving No. 4 Blast Furnace Stoves (S1C) shall not exceed 0.024 lbs/MMBtu.

(c) SO2 emissions from the Sinter Plant windbox (S2A) shall not exceed 1.0 pound of sulfur dioxide per ton of process material and 240 pounds of sulfur dioxide per hour.

(d) SO2 emissions from each of the stacks serving the three (3) natural gas/fuel oil furnaces (S4A, S4B and S4C) shall not exceed 1.254 lb SO2/MMBtu and 535.1 pounds of SO2 emitted per hour.

(e) SO2 emissions from each of the stacks serving Boiler No. 7 and Boiler No. 8 (S5C) at No.

2 Sheet Mill shall use natural gas only

(f) $SO_2$ emissions from Utility Boiler No. 5 (S8C/D), shall not exceed 0.896 lbs/ MMBtu.

(g) $SO_2$ emissions from Utility Boiler No. 6 (S8E), shall not exceed 0.896 lbs/ MMBtu.

(h) $SO_2$ emissions from Utility Boiler No. 7 (S8F), shall not exceed 0.896 lbs/ MMBtu.

(i) $SO_2$ emissions from Utility Boiler No. 8 (S8G), shall not exceed 0.896 lbs/ MMBtu.

(j) Total actual heat input from fuel oil and/or desulfurized coke oven gas usage at all boilers combined shall not exceed nine hundred ninety-three (993) million Btu per hour.

326 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2, for cold cleaning operations existing as of January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

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

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

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of cold cleaner degreaser facilities existing prior to January 1, 1990 shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{E}$C) (one hundred degrees Fahrenheit ($100^{E}$F));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{E}$C) (one hundred degrees Fahrenheit ($100^{E}$F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements

outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38$^{E}$C) (one hundred degrees Fahrenheit (100$^{E}$F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9$^{E}$C) (one hundred twenty degrees Fahrenheit (120$^{E}$F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-4-6 (Gasoline Storage Tank Requirements)

Pursuant to 326 IAC 8-4-6(b) No owner or operator of a gasoline dispensing facility shall allow the transfer of gasoline between any transport and any storage tank unless such tank is equipped with the following:

(a) A submerged fill pipe.

(b) Either a pressure relief valve set to release at no less than seven-tenths (0.7) pounds per square inch or an orifice of five-tenths (0.5) inch in diameter.

(c) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.

326 IAC 8-4-6 (Gasoline Dispensing Facility Requirements)

Pursuant to 326 IAC 8-4-6 (e):

(a) No owner or operator of a gasoline dispensing facility shall cause or allow the dispensing of motor vehicle fuel at any time unless all motor vehicle fuel dispensing operations are equipped with and utilize a certified vapor collection and control system which is properly installed and operated as follows:

(1) No vapor collection and control system shall be installed, used, or maintained unless the system has been certified by CARB and meets the testing requirements specified in 326 IAC 8-4-6 (k)(6).

(2) Any vapor collection and control system utilized shall be maintained in accordance to its certified configuration and with the manufacturer's specification and maintenance schedule.

(3) No elements or components of a vapor collection and control system shall be modified, removed, replaced, or otherwise rendered inoperative in a manner which prevents the system from performing in accordance with its certification and design specifications.

(b) One (1) operator or employee of the gasoline dispensing facility shall be trained and instructed annually in the proper operation and maintenance of a vapor collection and control system.

(c) Instructions shall be posted in a conspicuous and visible place within the motor vehicle fuel dispensing area for the system in use at that station. The instructions shall clearly describe how to fuel vehicles correctly with the vapor recovery nozzles utilized at that station. The instructions shall also include a warning that repeated attempts to continue dispensing motor vehicle fuel after the system has indicated that the vehicle fuel tank is full, may result in a spillage of fuel.

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

(a) Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for the 25,000 gallon Diesel Fuel Storage Tank (T4A13).

(b) Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all storage vessels containing No. 2 fuel oil, No. 6 fuel oil, diesel fuel, bleach and ethylene glycol.

326 IAC 8-13-3 (Sinter Plant Volatile Organic Compounds (VOCs))

Pursuant to 326 IAC 8-13-3(b) and (c) sinter plant windbox gas VOC emissions shall be limited as follows:

(a) During the period of May 1 through September 30, the total VOC (seasonal cap) emission limit is calculated and shall not exceed 143,973.0 lbs of VOC per ozone season

(b) Except as provided in 326 IAC 8-13-3(b)(3), on any day from May 1 through September 30, the sinter plant windbox exhaust VOC emissions (the maximum daily limit) limit is calculated and shall not exceed 1001.3 lbs of VOC per day.

(c) On any day from May 1 through September 30 when ozone levels in Lake, Porter or LaPorte Counties are expected to exceed the national ambient air quality standard for ozone (either one (1) hour or eight (8) hour), the sinter plant windbox exhaust VOC emissions (the lower daily limit) limit is calculated and shall not exceed 941.0 lbs of VOC per day.

A high ozone level day shall be predicted by the Permittee in accordance with a high ozone day action plan developed by the source and submitted to the IDEM, OAQ as part of the report required by 326 IAC 8-13-4(b).

(d) Pursuant to 326 IAC 8-13-4(b)(8) and an Ozone Action Plan Approval letter date stamped September 7, 1999, the Permittee shall do the following:

(1) The Permittee will comply with the emissions limits in 326 IAC 8-13 by monitoring sinter burden oil and grease content.

(2) The Permittee will limit the oil content of the major oil bearing components (mill scale and filter cake) of the sinter plant feed materials to 0.5%.

(3) Based on the compliance demonstrations and limit calculations submitted in a letter dated March 12, 1999:

(A) The value of the operating parameter oil content (pounds) determined using the procedure per 326 IAC 8-13-5(d)(10) is 42.2 lbs oil.

(B) The operating parameter value that corresponds to the emission rates expressed in pounds of VOC per ton of sinter produced adjusted to the VOC emission limit rates specified in 326 IAC 8-13-3 is calculated as:

(i) Ozone Season = 93.06 lbs of oil

(ii) Non-ozone season = 134.00 lbs of oil

(C) Sinter oil and grease content value in pounds equivalent to one-hundredth (0.01) pound of VOC/ton of sinter produced that is used to determine compliance with 326 IAC 8-13-6 is 2.86 lbs oil for every 0.01 lbs VOC/ton sinter

(4) The Permittee shall follow the alternative test procedure submitted to IDEM for oil and grease analysis to meet the requirements of 326 IAC 8-13-5(e)(2).

(5) The Permittee shall monitor sinter production by using conveyor belt scales per the procedure identified in the Ozone Action plan.

(6) The Permittee will follow the sampling frequency as described in 326 IAC 8-13-6(c)(3)(A).

(7) When practical, routine maintenance outages may be rescheduled to coincide with an ozone alert day. Rescheduling is dependant upon the availability of manpower to perform the maintenance.

(7) The Permittee shall predict high ozone days by contracting the weather service, Murray and Trettel, Inc. The prediction will be based on IDEM's notification program and guidance.

326 IAC 9 (Carbon Monoxide Emission Limitations)

(a) 326 IAC 9-1-2 and its provisions are applicable to all stationary sources of carbon monoxide emissions commencing operation after March 21, 1972. The No. 3 Blast Furnace commenced operation in 1953, therefore this rule does not apply.

(b) 326 IAC 9-1-2 and its provisions are applicable to all stationary sources of carbon monoxide emissions commencing operation after March 21, 1972. The No. 4 Blast Furnace commenced operation in 1967, therefore this rule does not apply.

(c) 326 IAC 9-1-2 and its provisions are applicable to all stationary sources of carbon monoxide emissions commencing operation after March 21, 1972. The Basic Oxygen Furnaces commenced operation in 1968, therefore this rule does not apply.

326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories)

Pursuant to 326 IAC 10-3-3, beginning May 31, 2004, and each ozone control period thereafter, the Permittee shall comply with the following NOx emission limits:

(a) NOx emissions from any affected boiler subject to this rule shall not exceed seventeen-hundreds pound of NOx per million Btus (0.17 lbs/MMBtu) of heat input over the ozone control period, and

(b) Ensure that fifty percent (50%) of the heat input shall be derived from blast furnace gas averaged over the ozone control period.

(c) During periods of blast furnace reline, startup, and period of malfunction, the affected boilers shall not be required to meet the requirement to derive fifty percent (50%) of the heat input from blast furnace gas.

**Testing Requirements**

ISG-Indiana Harbor Inc. has applicable performance testing conditions as specified below:

(a) In cases where the IDEM requires SO2 testing for fuel burning facilities, ISG's Fuel sampling and analysis protocol, as required by 326 IAC 7-4-1.1(d), requires sampling and sulfur analysis of sulfur containing fuels used at the source. ISG uses a SO2 emission factor developed through extensive stove stack testing. When estimating stack emissions, ISG takes a conservative approach and assumes that all sulfur is converted to SO2 upon combustion. The sample analysis is used to verify the emission factor. ISG can demonstrate compliance with applicable SO2 limits by emissions calculations at following units:

(1) No.3 and No.4 Blast Furnace Stoves

(2) No. 1, 2, 3 Reheat Furnaces at the 84" Hot Strip Mill

(3) No. 5, 6, 7 and 8 Boilers in the Utilities Section

(b) Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform TSP and $SO_2$ testing on the sinter plant windbox exhaust (S2A) using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.2.3 and D.2.4. These tests shall be repeated at least once every two and a one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(c) Pursuant to 326 IAC 8-13-4(g), the Permittee of a sintering operation who elects to change the control measure after the most recent compliance test shall do the following:

(1) Notify the IDEM at least twenty-one (21) days before implementing the change. Notification shall include the following:

(A) A description of the control measure and the appropriate operating parameter.

(B) The date the change will be implemented.

(C) The plan to comply with Condition D.2.5 with the changed control measure.

(2) Perform a compliance test within sixty (60) days of implementing the change according to procedures in 326 IAC 8-13-8 or according to the procedures that follow:

(A) Follow the source sampling procedures in 326 IAC 3-6-2.

(B) Follow the applicable test procedures.

(C) Calculate the operating parameter value that demonstrates compliance with the emission limit during the compliance test.

(D) Submit the compliance test results according to procedures in 326 IAC 8-13-4(d)(4).

(3) Maintain the value of the operating parameter within the specified boundaries after the date that the compliance test is complete.

(4) The Permittee who elects to change compliance demonstration procedures, for example, from sinter burden oil and grease content monitoring to a CEM, shall notify the OAQ at least thirty (30) days prior to making the change.

(d) Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform PM10 testing on the BOF electrostatic precipitator main stack utilizing a testing method approved by the Commissioner in accordance with Section C - Performance Testing. This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(e) Within twelve (12) months of issuance of this permit, the Permittee shall conduct a performance test for the Pickling Line (S5A) to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart A, General Provisions). This initial performance test shall meet the following minimum requirements:

(1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCI at the inlet and the outlet of the control device or measure the concentration of HCI in gases exiting the process or the emission control device.

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

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

(4) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative

average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR Part 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(5) Performance tests shall be conducted either annually or according to an alternative schedule approved by IDEM, OAQ, but no less frequently than every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.

(6) Pursuant to 40 CFR Part 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR Part 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.

(7) The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under D.5.2 if required:

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

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

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

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

(E) Method 26A, “Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method,” to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows: $C_{HCL(ppmv)} = 0.659\ C_{HCL(mg/dscm)}$, where $C_{(ppmv)}$ is concentration in ppmv and $C_{(mg/dscm)}$ is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(F) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

(f) Within twelve (12) months of permit issuance, the Permittee shall conduct a performance test for the Pickling Line (S6A) to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR Part 63.7 (Subpart

A, General Provisions). This initial performance test shall meet the following minimum requirements:

(1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCI at the inlet and the outlet of the control device or measure the concentration of HCI in gases exiting the process or the emission control device.

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

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

(4) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR Part 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(5) Performance tests shall be conducted either annually or according to an alternative schedule approved by IDEM, OAQ, but no less frequently than every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCI emission limitation is being exceeded, the Permittee is in violation of the emission limit.

(6) Pursuant to 40 CFR Part 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR Part 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.

(7) The following test methods from Appendix A of 40 CFR Part 60 shall be used to determine compliance under D.5.2 if required:

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

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

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

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

(E) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows: $C_{HCL(ppmv)} = 0.659\ C_{HCL(mg/dscm)}$, where $C_{(ppmv)}$ is concentration in ppmv and $C_{(mg/dscm)}$ is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(F) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA

**Compliance Requirements**

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

ISG-Indiana Harbor Inc. has applicable compliance monitoring conditions as specified below:

(a) Blast Furnaces:

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. .

(2) There is no parametric monitoring required for the No.3 and No. 4 Blast Furnace scrubbers for the gas cleaning system. The gas cleaning systems are integral parts of the process and are not considered control devices. None of the gas cleaning system equipment directly vents to the atmosphere.

(3) Visible emission notations are not necessary for No.3 and No.4 Stove stacks because only clean fuels (blast furnace gas and natural gas) are combusted.

(4) Visible emission notations of the No. 4 Blast Furnace Casthouse Baghouse (S1B) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit

(5) The Permittee shall record the pressure drop across the baghouse used in conjunction with the No. 4 Blast Furnace Casthouse Baghouse (S1B), at least once per shift when the above processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 2.5-6.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C- Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(6) An inspection shall be performed each calendar quarter of all bags controlling the No. 4 Blast Furnace Casthouse Baghouse (S1B) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(7) Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.1.5, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(A) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(B) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source's operation permit per procedures specified in 326 IAC 2.

(b) Sinter Plant:

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP.

(2) After the date of the initial or subsequent compliance test pursuant to Condition D.2.11, the Permittee shall comply with the following requirements:

(A) Following procedures in 326 IAC 8-13-5, analyze at least one (1) sample during each of the following operating periods of an operating day:

(i) 00:00 - 08:00
(ii) 08:00 - 16:00
(iii) 16:00 - 24:00.

(B) The Permittee may composite a number of grab samples taken within each operating period. If sinter is produced for less than a total of sixty (60) minutes in any operating period, the Permittee is not required to sample for oil and grease content during that operating period.

(C) Compliance with the oil and grease content requirements shall be determined in one (1) of the following ways:

(i) If the Permittee takes one (1) sample per operating period, the sample may be a composite of multiple samples taken within the operating period. The three (3) values shall be averaged over the day; and

a) The daily average value may exceed the operating parameter on not more than five (5) days per month by an oil amount not to exceed one-hundredth (0.01) pound of VOC per ton of sinter produced as determined by the initial or subsequent compliance test;

b) The daily average of the samples taken the day after the day in which the excursion occurred must be in compliance with the operating parameter;

c) An excursion greater than the specified percentage in excess of the operating parameter shall be considered a violation of the rule; and

d) More than five (5) excursions in a single month shall be considered a violation of this rule.

(ii) If the Permittee analyzes four (4) or more samples per operating period and determines the daily average oil and grease content values, then:

a) The daily average oil and grease content shall not exceed the operating parameter determined in 326 IAC 8-13-5(d)(10) or 326 IAC 8-13-5(d)(11);

b) An exceedance of the operating parameter is a violation of the rule; and

c) No excursions are allowed since the greater number of samples should decrease the sampling variation.

(iii) Owners or operators of a sintering process that meet the emission limits in 326 IAC 8-13-3 (Condition D.2.5) by means other than those specified in 326 IAC 8-13-6 (b) or (c) shall describe the following:

a) Operation and maintenance of the control measure;

b) The process parameter or parameters and the value and range of the process parameter or parameters that indicate compliance with the emission limit; and

c) The operating records that will be maintained.

(3) Visible emission notations of the Sinter Plant windbox main scrubber stack (S2A), and the discharge end scrubber stack (S2B) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(4) The Permittee shall record the total static pressure drop across to the windbox main scrubber (S2A) used in conjunction with the sinter plant operations, at least once per shift when the windbox is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the windbox main baghouse is outside the normal range of 4.0 and 9.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the windbox main scrubber used in conjunction with the sinter plant operations, at least once per shift when the windbox is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is outside the normal range of 29-69 gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(5) The Permittee shall record the total static pressure drop across the sinter plant discharge (breaker) scrubber (S2B) used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the discharge (breaker) scrubber is outside the normal range of 8.0 and 12.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response

Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the sinter plant discharge (breaker) scrubber used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is outside the normal range of 900-1500 gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(6) An inspection shall be performed each calendar quarter of all scrubbers controlling the windbox main scrubber (S2A) and sinter plant discharge (breaker) scrubber when venting to the atmosphere. Inspections required by this condition shall not be performed in consecutive months.

(7) An inspection shall be performed each calendar quarter of all cyclones controlling the sinter plant operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months.

(c) BOF

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP.

(2) Visible emission notations of the reladle/desulfurization baghouse stack (S3B) and the ladle metallurgical facility (LMF) baghouse stack (S3C) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the reladle/desulfurization operations (S3B), and the ladle metallurgical facility (LMF) operations (S3C) at least once per shift when the associated processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 4.0-10.0 inches of water or a range established during the latest stack

test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(4) An inspection shall be performed each calendar quarter of all bags controlling the reladle/desulfurization operations (S3B), and the ladle metallurgical facility (LMF) operations (S3C) when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

(d) 84” Mill

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee’s CCP.

(2) Visible emission notations of the three (3) natural gas/fuel oil furnaces stacks (S4A, S4B and S4C) shall be performed once per shift during normal daylight operations when exhausting to the atmosphere and using fuel oil. A trained employee shall record whether emissions are normal or abnormal. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Pursuant to 326 IAC 7-4-1.1(d), and in order to comply with condition D.4.2, the Permittee shall submit a sampling and analysis protocol to IDEM. The protocol shall contain the following:

(A) A description of planned procedures for sampling of sulfur-bearing fuels and materials for analysis of sulfur content, and for any planned direct measurement of sulfur dioxide emissions vented to the atmosphere.

(B) The protocol shall specify the frequency of sampling, analysis and/or measurement for each fuel and materials for each facility. The department shall incorporate the protocol into the source’s operation permit per procedures specified in 326 IAC 2.

(e) No. 2 Sheet Mill

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and

maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP.

(2) Monitoring Requirements [40 CFR Part 63.1162]

(A) The Permittee of a new, reconstructed, or existing steel pickling facility shall:

(i) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR Part 63.1160(b)(2).

(ii) Failure to record each of the operating parameters in 40 CFR Part 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR Part 63, Subpart CCC.

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

(iv) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.

(3) No additional monitoring is required for the scrubber because it is an integral part of Pickling process.

(f) No. 3 Sheet Mill

(1) Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP.

(2) Monitoring Requirements [40 CFR Part 63.1162]

(A) The Permittee of a new, reconstructed, or existing steel pickling facility shall:

(i) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR Part 63.1160(b)(2).

(ii) Failure to record each of the operating parameters in 40 CFR Part 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR Part 63, Subpart CCC.

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

(v) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.

(3) No additional monitoring is required for the scrubber because it is an integral part of Pickling process.

(g) Utilities

(1) Pursuant to 326 IAC 6-1-10.1(p)(4), the Continuous Compliance Plan (CCP) plans for the Fuel combustion boilers shall include the following:

(A) requirements of this subdivision shall not relax the fuel monitoring and reporting requirements of 326 IAC 7-1.1-1 for the sources this section applies to

(B) maintain records as required by 326 IAC 6-1-10.1(p)(4)(B)

(C) guidance found in 326 IAC 6-1-10.1(p)(4)(C) may be used to estimate emissions

(h) Transportation Shop

Gasoline Dispensing Facility Monitoring Requirements
Pursuant to 326 IAC 8-4-6 (e):

(1) A vapor collection and control system shall not be operated with defective, malfunctioning, missing, or noncertified components. The following requirements apply to a vapor collection and control system:

(A) All parts of the system which can be visually inspected must be checked daily by the operator of the facility for the following malfunctions:

(i) Absence or disconnection of any component required to be used to certify the system.

(ii) A vapor hose which is crimped or flattened such that the vapor passage is blocked or severely restricted.

(iii) A nozzle boot which is torn in either of the following manners:

a) A triangular shaped or similar tear one-half (½) inch or more to a side or a hole one-half (½) inch or more in diameter or length.

b) Slit one (1) inch or more in length.

(B) A faceplate or flexible cone which is damaged in the following manner:

(i) For balance nozzles and nozzles for aspirator and educator assist type systems, damage shall be such that the capability to achieve a seal with a fill pipe interface is affected for one-fourth (¼) of the circumference of the faceplate (accumulated).

(ii) For nozzles for vacuum assist type systems that use a flexible cone, having more than one-fourth (¼) of the flexible cone missing.

(C) A nozzle shutoff mechanism which malfunctions in any manner.

(D) A vacuum producing device which is inoperative.

(E) All vapor collection and control systems shall be retested for vapor leakage and blockage, and successfully pass the test, at least every five (5) years or upon major system replacement or modification. A major system modification is considered to be replacing, repairing, or upgrading seventy-five percent (75%) or more of a vapor collection and control system of a facility.

(h) Vessels

Pursuant to 40 CFR Part 63.1162, the Permittee of an affected hydrochloric acid storage vessel shall inspect each vessel semiannually to determine that the closed-vent system and either the air pollution control device or the enclosed loading and unloading line, whichever is applicable, are installed and operating when required.

**Conclusion**

The operation of this integrated steel mill operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T089-7099-00318.

# Indiana Department of Environmental Management
# Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

| | |
|---|---|
| Source Name: | ISG-Indiana Harbor Inc. |
| Source Location: | 3001 Dickey Road, East Chicago, Indiana 46312-1610 |
| County: | Lake |
| SIC Code: | 3312 |
| Operation Permit No.: | T089-7099-00318 |
| Permit Reviewer: | Teresa Freeman |

On November 20, 2003, the Office of Air Quality (OAQ) had a notice published in The Post Tribune in Merrillville, Indiana and The Times in Munster, Indiana, stating that ISG-Indiana Harbor Inc. had applied for a Part 70 Operating Permit to operate a stationary integrated steel mill and finishing facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of sixty (60) days to provide comments on whether or not this permit should be issued as proposed.

The applicability of state and federal rules presented in the Technical Support Document is based on the information provided in the Part 70 application and contained in IDEM's files. This information was not comprehensive enough to provide a non-applicability determination in the TSD or to provide permit shield in the Part 70 Permit itself.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

**Change 1:**

In condition C.9, the term "source" is replaced with "Permittee" as follows:

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

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

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **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.

**Change 2:**

In condition C.17 (previously C.16), the term "source" is replaced with "Permittee" as follows:

C.1~~6~~**7** Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

**Change 3:**

Condition C.18 (previously C.17) - Compliance Response Plan - Preparation, Implementation, Records, and Reports has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. It is intended to provide OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements. In addition if a source is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP. The changes to condition C.16 are as follows:

C.1~~7~~**8** Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and S~~M~~**S**M Plan) shall be submitted within the time frames specified by the applicable 40 CFR 60/63 requirements.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current

Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be **ten (**10**)** days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down~~,~~**. The notification shall also include** the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

**Change 4:**

The following revisions were made to the Emission Statement condition to incorporate the revisions to 326 IAC 2-6 that became effective March 27, 2004. The revised rule was published in the April 1, 2004 Indiana Register. Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). This Part 70 source located in Lake County has the potential to emit above threshold emissions in 326 IAC 2-6-3(a)(1); therefore, the source is required to submit an emission statement by July 1st each year. Condition C.20 (previously C.19) has been changed as follows:

C.~~19~~**20** Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~

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

(1) Indicate estimated actual emissions of ~~criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting)~~ **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 purposes of Part 70 fee assessment.

~~(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

**The statement must be submitted to:**

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

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

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

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

**Change 5:**

In condition C.22 (previously C.21), the term "source" is replaced with "Permittee" as follows:

C.2~~1~~**2** General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Change 6:**

In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence; otherwise, USEPA will object to the permits. The following language has been incorporated into the permit to address credible evidence:

**B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]**

**Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.**

**Change 7:**

Boiler No. 5 (S8C/D), Boiler No. 6 (S8E), Boiler No. 7 (S8F) and Boiler No. 8 (S8G) are not subject to the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD because they burn more than 90% blast furnace gas and are therefore excluded, pursuant to 40 CFR 63.7575. If the blast furnace gas usage for these boilers drops below 90%, these boilers will trigger the MACT requirements of 40 CFR 63, Subpart DDDDD. Pursuant to 40 CFR 63.1(b)(3) and 40 CFR 63.10(b)(3) [326 IAC 20-1-1] IDEM is authorized to require records for at least five years of the blast furnace gas usage since that is what makes them eligible for the blast furnace gas exclusion. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f), and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under this part) because of

limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. Condition D.7.8 is revised to add this requirement as follows:

D.7.8 Record Keeping Requirements

(a) To document compliance with Conditions D.7.2 and D.7.7, the Permittee shall maintain the following records:

(1) Records of the total coke oven gas, blast furnace gas, fuel oil, and natural gas usage for each day at the Nos. 5, 6, 7, and 8 Boilers.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

**(b) Pursuant to 40 CFR 63.1(b)(3) and 40 CFR 63.10 (b)(3), in order to document exclusion from applicability to 40 CFR 63, Subpart DDDDD, the Permittee shall maintain records of fuel usage at boilers 5, 6, 7 and 8, ascertaining that on the annual basis the blast furnace gas usage at each boiler is greater than 90%. These records shall be kept for a period of five (5) years after the determination of exclusion, or until the source changes its operations to become an affected source, whichever comes first.**

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

**Change 8:**

Section D.6 has been revised to ensure that the permit conditions are consistent with the 40 CFR 63, Subpart CCC. Also pursuant to 40 CFR 63.1166, IDEM does not have authority for approval of alternate emission standards to those specified in 40 CFR 63.1157 and 40 CFR 63.1158, alternate measurement methods for HCl or Cl2 to those specified in 40 CFR 63.1161(d)(1) or alternative monitoring requirements to those specified in 40 CFR 63.1162(a)(2) through 40 CFR 63.1162(a)(5) and 40 CFR 63.1162(b)(1) through 40 CFR 63.1162(b)(3) and those changes have been made to the Part 70 Permit. IDEM does have authority to approve an alternative schedule for conducting performance tests as specified in 40 CFR 63.1162(a)(1). The changes to D.6.2, D.6.7, D.6.8, D.6.9 and D.6.10 are as follows:

D.6.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63, Subpart CCC] **[40 CFR 63.1157]**

Pursuant to 40 CFR 63, Subpart CCC, the Pickling Line (S6A) shall comply with the following requirements:

(a) The Permittee shall not cause or allow to be discharged into the atmosphere from the affected pickling line:

(1) Any gases that contain HCl in a concentration in excess of 18 ppmv; or

(2) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.

D.6.7 Testing Requirements [40 CFR 63.1161] **[40 CFR 63.1162]**

(a) Within twelve (12) months of permit issuance, the Permittee shall conduct a performance test for the Pickling Line (S6A) to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR 63.7 (Subpart A,

General Provisions). This initial performance test shall meet the following minimum requirements:

(1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCI at the inlet and the outlet of the control device **(to determine compliance with the applicable collection efficiency standard)** or measure the concentration of HCI in gases exiting the process or the emission control device **(to determine compliance with the applicable emission concentration standards)**.

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

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

(b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation**,** the minimum recirculation water flow rate~~, as applicable~~. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.

(c) ~~Performance tests shall be conducted according to an alternative schedule approved by IDEM, OAQ, every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCI emission limitation is being exceeded, the Permittee is in violation of the emission limit.~~ **Conduct performance tests to measure the HCl flows at the control device inlet and outlet or the concentration of HCl exiting the control device according to the procedures described in 40 CFR 63.1161. Performance tests shall be conducted according to an alternative schedule approved by IDEM, OAQ, every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCI emission limitation is being exceeded, the Permittee is in violation of the emission limit.**

(d) Pursuant to 40 CFR 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ, in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ, to review and approve the site-specific test plan required under 40 CFR 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.

(e) The following test methods from Appendix A of 40 CFR 60 shall be used to determine compliance under **40 CFR 63.1157(a);** ~~condition D.5.2 and D.5.3, if required:~~

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

duct wall;

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

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

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

(5) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows: C HCL(ppmv) = 0.659 C HCL(mg/dscm), where C (ppmv) is concentration in ppmv and C (mg/dscm) is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.

(6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.

~~D.6.8 Monitoring Requirements [40 CFR 63.1162]~~

The Permittee shall**:**

**(a)** **In addition to conducting performance tests, if a wet scrubber is used as the emission control device,** install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if ~~applicable~~ **required**, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2~~), if applicable~~.

(b) Failure to record each of the operating parameters in 40 CFR 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR 63, Subpart CCC.

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

(d) The Permittee may develop and implement alternative monitoring requirements subject to approval by ~~IDEM, OAQ~~ **U.S. EPA**.

D.6.9 Record Keeping Requirements [40 CFR 63.1165]

(2) **In addition to the general** ~~R~~records ~~specifically~~ required ~~under~~ **by** 40 CFR 63.**1165(a)** ~~, Subpart CCC~~ **the Permittee shall maintain records for 5 years from the date of each record of**:

(A) Scrubber makeup water flow rate and recirculation water flow rate if a wet scrubber is used~~, if applicable~~;

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

(C) Each maintenance inspection and repair, replacement, or other corrective

action; **and**

(~~D~~**3**) The Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAQ, for the life of the affected source or until the source is no longer subject to the~~se~~ provisions **of 40 CFR 63, Subpart CCC**. In addition, if the operation and maintenance plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the plan on record to be made available for inspection by IDEM, OAQ, for a period of 5 years after each revision to the plan.

(b) **General** ~~R~~records **and** ~~maintained pursuant to the record keeping requirements of~~ 40 CFR 63, Subpart CCC **records**, **for the most recent 2 years of operation must be** ~~shall be~~ maintained on site for ~~a period of~~ 2 years. Records for the 3 previous years may be maintained off site.

~~(c) To document compliance with Condition D.6.4, the Permittee shall maintain records of fuel usage and burn natural gas only.~~

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

D.6.10 Reporting Requirements [40 CFR 63.1164]

(a) As required by 40 CFR 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40 CFR 63.1163.

(b) The Permittee of an affected source who is required to submit progress reports under 40 CFR 63.6(i), shall submit such reports to IDEM, OAQ, by the dates specified in the written extension of compliance.

(c) **Pursuant to 40 CFR 63.6(e),** ~~T~~**t**he Permittee of an affected source is required to operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.

(1) **Pursuant to 40 CFR 63.6(e)(3),** ~~T~~**t**he Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.

(2) **Pursuant to 40 CFR 63.10(d)(5)(I)** ~~I~~**i**f actions taken by a~~n~~ Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the owner/operator or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half; and

(3) Any time an action taken by a Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR 63.10(d)(5)(ii).

(d) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

**Change 9:**

Changes have been made to the MACT language to provide more clarification of the permit shield applicability and to clarify our delegation authority, since IDEM reviews the initial notifications and EPA does not need to be copied. Conditions D.1.1, D.1.17(c), D.2.1, D.2.23(c), D.3.1 and D.3.18(c) have been changed as follows:

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [Table 4 to 40 CFR 63, Subpart FFFFF]

**(a)** The provisions of 40 CFR 63, Subpart A- General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected sources, No. 3 Blast Furnace and No. 4 Blast Furnace, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee must comply with these requirements on and after May 20, 2003.

**(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.1.17 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Blast Furnaces [40 CFR 63.7835][40 CFR 63.7840]**

D.1.17 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Blast Furnaces [40 CFR 63.7835][40 CFR 63.7840]

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003, in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~And~~

~~United States Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

The initial notification does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [able 4 to 40 CFR 63, Subpart FFFFF]

**(a)** The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, Sinter Plant, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee shall comply with these requirements on and after May 20, 2003.

**(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided**

**in this condition. The permit shield applies to Condition D.2.23 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Sinter Plants [40 CFR 63.7835][40 CFR 63.7640]**

D.2.23 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Reporting Requirements for Sinter Plants [40 CFR 63.7835][40 CFR 63.7640]

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003 in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~and~~

~~United State Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

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

D.3.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [Table 4 to 40 CFR 63, Subpart FFFFF]

**(a)** The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, Basic Oxygen Process Furnace (BOPF), except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee shall comply with these requirements on and after May 20, 2003.

**(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition, except as otherwise provided in this condition. The permit shield applies to Condition D.3.18 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - Reporting Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7835][40 CFR 63.7640]**

D.3.18 National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing- Reporting Requirements for Basic Oxygen Process Furnace (BOPF) [40 CFR 63.7835][40 CFR 63.7640]

(c) The Permittee shall submit an initial notification no later than 120 days after May 20, 2003 in accordance with 40 CFR 63.9(b) and 40 CFR 63.7840. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~and~~

~~United State Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~

~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

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

**Change 10:**

A requirement to report excess emissions recorded by the COMs from BOF stack (S3A) was omitted from the Part 70 Permit. A new condition D.3.18 has been added as follows:

**D.3.18 Reporting Requirements**

**The Permittee shall submit a quarterly excess emissions report, based on the continuous opacity monitor (COM) required in conditions D.3.11 data for opacity, pursuant to 326 IAC 3-5-7. These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

On January 21, 2004, ISG-Indiana Harbor, Inc. submitted comments on the proposed Part 70 permit. The comments and IDEM responses (with language added shown in bold and language deleted in strikeout) are as follows:

**Comment 1:**

Corporate Address
All environmental correspondence should be sent to ISG Corporate Headquarters and directed to:

Keith Nagel
International Steel Group Inc.
3250 Interstate Drive
2nd Floor
Richfield, Ohio 44286-9000

**Response 1:**

This change has been made to Section A.1, all report forms and to the permits branch tracking system database.

**Comment 2:**

Responsible Official
The General Manager of the ISG Indiana Harbor facility meets criterion (v) in the definition of "Responsible Official" as a "person who performs similar policy or decision making functions for the corporation" as a vice president in charge of a principal business function. The General Manager also meets criterion (vi) as the representative responsible for the overall operation of a manufacturing facility that employs more than 250 persons with gross annual sales or expenditures exceeding $25 million. Therefore, the General Manager does not need to be a vice president of the corporation to be a "Responsible Official." Please delete "Vice President and" from the Responsible Official description under A.1 [p. 9 of 110].

**Response 2:**

Condition A.1 has been changed as follows:

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

The Permittee owns and operates a stationary integrated steel mill and finishing facility

| | |
|---|---|
| Responsible Official: | ~~Vice-President and~~ General Manager, ISG Indiana Harbor Inc. |
| Source Address: | 3001 Dickey Road, East Chicago 46312 |
| Mailing Address: | **3250 Interstate Drive, 2nd Floor, Richfield, Ohio 44286-9000** |
| General Source Phone Number: | (219) 391-2571 |

**Comment 3:**

Source Location Status
The source summary (section A.1) should identify Lake County as "attainment" for PM10 based on the federal designation at 40 CFR 81.315 and the Air Pollution Control Board action on September 3, 2003 to adopt the final state rule redesignating Lake County as attainment for PM10. The permit should reflect the most recent status of the source location throughout.

**Response 3:**

On December 31, 2003, IDEM adopted a revision to 326 IAC 1-4-1 redesignating Lake County as attainment for PM10. Additionally, on April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Lake County has been designated as nonattaiment for the 8-hour ozone standard. Therefore, Condition A.1 is revised as follows:

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

| | |
|---|---|
| Source Location Status: | Nonattainment for ~~$PM_{10}$ *,~~ $SO_2$, **1-hour** ozone and **8-hour ozone standard**<br>Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program<br>Major Source, under PSD and Emission Offset Rules;<br>Major Source, Section 112 of the Clean Air Act<br>1 of 28 Source Categories under PSD and Emission Offset Rules |

~~*Lake County has been federally redesignated in 40 CFR 81.315 as attainment for PM10. The Air Pollution Control Board will be making the same redesignation in state rules.~~

Although the TSD itself will not be revised as it is a historical document and the TSD was correct at the time of public notice, the following is being provided to show how the county attainment status has been affected as a result of the 8-hour ozone standard designations. The county attainment status regarding other pollutants remain unchanged; therefore will not be shown below other than in the table.

**County Attainment Status**

The source is located in Lake County.

| Pollutant | Status |
|---|---|
| PM-10 | attainment |
| $SO_2$ | nonattainment |
| $NO_2$ | attainment |
| 1-hour Ozone | **nonattainment** |
| 8-hour Ozone | **nonattainment** |
| CO | attainment |
| Lead | attainment or unclassifieable |

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are precursors for

the formation of ozone.

(1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.

**Comment 4:**

ISG Contractors
IDEM has determined that ISG and each of the on-site contractors listed in Section A.2 are under common control and considered one (1) source due to "contractual control." ISG disagrees with IDEM's decision and requests that contractors NOT be included in this permit for the following reasons: "Contractual control" is not one of the criteria for determining if a group of sources should be considered part of the same "major source" for Title V permitting. See 326 IAC 2-7-1(22). "Major source" is defined so that it "shall include any group of stationary sources that are located on one (1) or more contiguous or adjacent properties and are under common control of the same person (or persons under common control) belonging to a single major industrial grouping." While these contractors operate on contiguous properties with ISG, they are all separately owned and operated and most belong in a different two-digit SIC code major industrial grouping. [ISG-33; Oil Technology-29; International Mill Service-33; Edward Levy-32; Ironside Energy-49; and Heckett Multiserv-32]. The contracts between ISG and these service providers are arms-length agreements to purchase services, and they do not give ISG the right or obligation to control contractor operations. Without further evidence of common control, these contractors should not be considered "support facilities" for the purpose of assigning them the steel mill's major industrial grouping.

Contractor equipment should be evaluated independently to determine if a Title V permit is warranted and the contractor should be contacted regarding compliance with any applicable permit obligations. ISG's Title V Permit may list the onsite contractors and their separately issued permits solely for administrative purposes. However, all language in the draft Title V Permit that could impose compliance obligations on ISG for the actions of its contractors must be deleted from the permit before final issuance. *See e.g.*, A.2 [pp.9-10 of 110] (delete paragraph starting with "IDEM has determined that ISG-Indiana Harbor Inc.…" and, from the next paragraph, delete the phrase "solely for administrative purposes.")

**Response 4:**

On September 24, 1996, IDEM adopted the non-rule policy document "Title V Permitting Issues: On-Site Contractors" (Air-006-NPD) regarding on-site contractors and the definition of major source (326 IAC 2-7-1 (22)). IDEM presumes that an on-site contractor is part of the primary source located on the property if the contractor provides a majority of its goods or services to the primary source. A primary source or on-site contractor can rebut this presumption by establishing that the on-site contractor does not provide the majority of its goods or services to the primary source. All of the information IDEM has indicates that the contractor provides a majority of its services to ISG, and that the contractor receives a majority of its input from ISG. At this time, the Permittee has provided no additional information rebutting IDEM's assertion. Therefore no change is made to the permit.

Recognizing that on-site contractors may find one Title V permit encompassing the entire major source cumbersome to use, IDEM is issuing separate Title V permits for the on-site contractors and the primary source. The permits are issued based on a logical division of operations, with the operations of the on-site contractors segregated from the operations of the primary source.

Consistent with current enforcement practice, the on-site contractor is responsible for complying with all applicable regulations. If an on-site contractor violates a provision of its Title V permit, IDEM will attempt to resolve the issue with the on-site contractor. If IDEM is unable to reach a settlement with the on-site contractor, IDEM may include the primary source in the enforcement proceeding in an attempt to resolve the issues. IDEM anticipates that in most cases, negotiations between the on-site contractor and IDEM will successfully resolve the issues.

No change has been made as a result of this comment.

**Comment 5:**

Section A.2 – Part 70 Source Definition
The following minor corrections should be made to more accurately describe each:
Oil Tech … is located at, *3001 Dickey Road*, East Chicago, Indiana;
(d) Levy Company does not process steel slag. Please delete *"steel"* from the description.

**Response 5:**

The following changes have been made to condition A.2:

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

ISG-Indiana Harbor Inc. is an integrated steel mill consisting of a source with on-site contractors:

(a) ISG-Indiana Harbor Inc. (Plant ID 089-00318), the primary operation, is located at, 3001 Dickey Road, East Chicago, Indiana and

(b) Oil Tech, Inc (Plant ID 089-00375), the on-site contractor (a used oil recycling facility), is located at **3001 Dickey Road**, East Chicago, Indiana;

(c) International Mill Service (Plant ID 089-00353), the on-site contractor (a steel slab scarfer) is located 3001 Dickey Road, East Chicago, Indiana;

(d) Edward Levy (Plant ID 089-00339), the on-site contractor (a ~~steel~~ slag processing facility), is located at 3001 Dickey Road, East Chicago, Indiana;

(e) Ironside Energy, **LLC,** (Plant ID 089-00448), the on-site contractor (an industrial steam and electric power cogeneration plant), is located at 3001 Dickey Road, East Chicago, Indiana

(f) Heckett Multiserv (Plant ID 089-00341), the on-site contractor (a slag and kish processing plant), is located at East Chicago, Indiana;

**Comment 6:**

Section A.3 – Emission Unit Descriptions
The following minor corrections should be made to more accurately describe each unit:
Section A.3(b)(1) – change *aw* material to *raw* materials.
Section A.3(c)(1) – change *Two* (2) slag skimming stations to *two* (2) slag skimming stations.
Section A.3(c)(4) – the Vacuum Degassing Facility flare stack ID is *S3D*.
Section A.3(e)(3) – No. 2 Sheet Mill Pickle Line is not owned or operated by ISG. This Pickle Line has been sold to United States Steel, which is not under common control of, or a support facility for, ISG. Therefore, ISG requests that this description be removed from the permit.

Section A.3(h)(11)(B) – change description to *"Two (2) Diesel Fuel Storage Tanks (T-4A7 & T-4A8) each with a 10,000 gallon storage capacity."*
Section A.3(i)(2) – change description *#2* fuel oil to *#6* fuel oil.
Section A.3(i) – add tank, (12) One (1) 8,000 gallon diesel fuel tank (T-4F95).

**Response 6:**

The following changes have been made to condition A.3 and description boxes D.2, D.3, D.5, D.8 and D.9:

**(b) One (1) Sinter Plant with a maximum raw material usage rate of 2,592,782 tons per year and a maximum annual production capacity of 2,119,920 tons of sinter per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices: (Installed in 1958)**

(1) Raw material handling area consisting of material feeders (storage bins), conveyors, a pug mill and hearth layer returns from screening that combines these **r**aw materials to create a uniform mixed burden that is deposited on the sinter strand.

**(c) Basic Oxygen Furnace (BOF) Shop, comprised of the following facilities, process equipment, and operational practices:**

(1) One (1) Hot Metal Reladle/Desulf Complex consisting of two (2) reladle stations, two (2) desulfurization stations and ~~T~~**two** (2) slag skimming stations, installed in 1982, having a maximum capacity of 5,630,208 tons per year of hot metal and sulfur scavenger. Emissions from all stations are controlled by a baghouse, designated as Baghouse No. 1 with captured emissions exhausting to stack (S3B) and uncaptured/fugitive emissions exhausting through a roof monitor (V3B)

(4) One (1) Vacuum Degassing Facility (decarbonization), installed in 1988, with carbon monoxide (CO) emissions controlled by an integral CO scrubber and exhausting to the flare at stack (S3~~C~~**D**)

**(e) One (1) Sheet Mill Finishing operation, designated as No. 2 Sheet Mill, having a maximum capacity of 1,404,929 tons per year, comprised of the following facilities, fugitive sources, process equipment, and operational practices:**

~~(3) One (1) Pickle Line (installed in 1952) consisting four (4) HCl process tanks and a water rinse tank, with acid fumes controlled by one (1) packed tower scrubber with air flow of 22,000 acfm exhausting through stack (S5A)~~

(~~4~~**3**) Two (2) natural gas fired boilers designated as Boiler No. 7 and Boiler No. 8 (installed in 1955), having a combined heat input of 98 MMBtu per hour, with uncontrolled emissions exhausting to (S5C)

(~~5~~**4**) Seven (7) space heaters (installed in 1968) having a combined heat input of 17.5 MMBtu per hour, with uncontrolled emissions exhausting to vent (V5B) to No. 2 Sheet Mill shop.

**(h) Shops***

(11) Transportation Shop

(A) Gasoline Dispensing Facility with 10,000 gallon capacity Storage Tank (T4A22) (162, 504 gal/yr throughput), installed in 1988

(B) ~~One (1)~~ **Two (2)** Diesel Fuel Storage Tank**s** ~~(T4A13)~~ **(T-4A7 & T- 4A8)** with a ~~25~~**10**,000 gallon storage capacity.

**(i) Storage Vessels: (all tanks installed before 1975)**

(2) One (1) 70,000 gallon storage tank containing #~~2~~**6** fuel oil (T4A1)

**(12) One (1) 8,000 gallon diesel fuel tank (T-4F95)**

**Comment 7:**

Section B.3 – Enforceability
ISG requests that all permit terms not directly related to compliance with the Clean Air Act be marked state-only enforceable to avoid the blanket designation of federal enforceability contained in this general permit term.

**Response 7:**

Pursuant to Condition B.3, "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." In this permit, all requirements are federally enforceable except for those specified in Conditions C.2 (Open Burning), C.4 (Incineration), C.7 (Stack Height) and C.8 (Asbestos Abatement Projects) each of which explicitly states that the underlying citation, either in whole or part, is not federally enforceable.

**Comment 8:**

Section B.4 – Termination of Right to Operate
ISG requests that IDEM confirm that it is not the agency's intention to deny the Permittee a right to operate this source when the renewal deadline is missed for reasons beyond Permittee's control. For instance, in the event that the Permittee sells the source and re-acquires it by default of the purchaser after the deadline for timely filing for renewal of the Title V Permit. As written, the permit term could be read to deny the Permittee the right to operate even when the agency agrees to issue a new permit.

**Response 8:**

If the Permittee submits a timely and complete application for a Part 70 permit (including for renewal) then the source's failure to have a Part 70 permit is not a violation of 326 IAC 2-7-3. A timely Part 70 permit application as required by 2-7-4(a)(1)(D), must be submitted at least 9 months prior to the date of expiration of the source's existing operating permit. There are currently no provisions, including extending the deadline for submitting an application for renewal of Part 70 Permit, in the rule to address the situation described. No change has been made as a result of this comment.

**Comment 9:**

Section B.10 – Preventative Maintenance Plans (PMP)
B.10(d) allows Operation and Maintenance Plans and Monitoring Plans required by 40 CFR 60/63 to satisfy the Preventative Maintenance Plan requirements. Most control devices at ISG have Continuous Compliance Plans (CCP's) required by 326 IAC 6-1-10.1*)*. These CCP's include extensive maintenance, monitoring and inspection procedures and should also be allowed to satisfy the PMP requirements. The following language should be added to subpart (d), "…*or is required by 326 IAC 6-10.1 to have a Continuous Compliance Plan (CCP),* …".

**Response 9:**

IDEM, OAQ is required to include all applicable rules in the Part 70 Operating Permit. Since Preventive Maintenance Plans and Continuous Compliance Plans are both required, the Permittee must comply with both requirements. The Permittee should consult with the IDEM inspector assigned to the source to evaluate the PMP vs. CCP requirements. No change has been made as a result of this comment.

**Comment 10:**

Section B.14 (b) – Deviations from Permit Requirements and Conditions
ISG contends that situations may arise where compliance monitoring information may not be available due to situations beyond its control and that all excursions from compliance monitoring parameter ranges result in permit limit deviations. Therefore ISG requests that the permit be revised to include the following:
*A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. A deviation is not:*
*An emergency as defined in 326 IAC 2-7-1(12), or*
*Failure to make or record information required by the compliance monitoring provisions of applicable Section D's unless such failure exceeds 5% of the required data in any calendar quarter, or*
*An excursion from compliance monitoring parameters as identified in applicable Section D's unless tied to an applicable rule or limit.*

**Response 10:**

The intent of the Part 70 permit program is to ensure continuous compliance with the applicable requirements. Therefore, the department has required that compliance monitoring data for the complete duration of the operation should be assessed for ascertaining compliance. An excursion of a monitoring parameter is not a deviation from the permit requirement. Failure to take response steps needed due to an excursion is a deviation. The department usually handles concerns about the non-availability of 100% of compliance monitoring data as expressed by the commentator by exercising "enforcement discretion" to pursue or not to pursue these matters. The Enforcement Section of the department works closely with the Permittee to understand, in great detail, the physical constraints or realistic factors influencing the information availability. The department uses a case-by-case evaluation of the missing information in order to exercise the enforcement discretion. Therefore, no changes are made to any permit conditions as a result of this comment.

**Comment 11:**

Section C.5(a) – Fugitive Dust Emissions
ISG requests that IDEM revise Section C.5 and any other provisions of this permit to reflect any changes to the applicable requirements resulting from the redesignation of Lake County as attainment for PM10. At minimum, ISG requests that IDEM not paraphrase the Lake County Fugitive Matter Control Limitations found in 326 IAC 6-1-11.1, but incorporate them by reference so that ISG can benefit from any upcoming changes to the rules. Further, paraphrasing may inadvertently change the underlying applicable requirement or omit flexibility that ISG wants to preserve. We suggest that IDEM replace (a) with:
*"The Permittee shall limit fugitive emissions of particulate matter from affected facilities in accordance with 326 IAC 6.1.11.1(d)(1) through (9) as applicable."*

Section C.5(a) – Fugitive Dust Emissions
If IDEM chooses not to incorporate the Lake County Fugitive Particulate Matter Control Limitations by reference as suggested above, the permit terms must be expanded to adequately describe the emission limits and associated compliance options found in 326 IAC 6-1-11.1(d). For example, ISG has identified the following changes to conform the permit to the applicable rule:

*(3) Material transfer limits shall be as follows:*
*The average instantaneous opacity of fugitive emissions from batch transfer operations shall not exceed 10%.*

*Where adequate wetting of the material of the material is prohibitive to further processing or reuse of the material, the opacity shall not exceed 10% three minute average.*
*Slag and Kish handling:*
*aa) Transfers from pots and trucks into pits – 20% opacity, 6 minute average.*
*bb) Transfers from pits to front end loaders – 20% opacity, 3 minute average.*
*cc) Transfers from front end loaders into trucks – 20% opacity, 3 minute average.*

…

*(5) Wind erosion from storage piles and exposed areas. The opacity of fugitive particulate emissions from storage piles shall not exceed 10% on a six minute average. These limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the Permittee must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.*

*(6) There shall be zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time. Material that is transported by truck or rail hat is enclosed or covered shall be considered in compliance with the in plant transportation requirement.*

…

*(13) The opacity of fugitive particulate emissions from a material processing facility, except a crusher where a capture system is not used, shall not exceed 10%. Fugitive particulate emissions from a crusher where a capture system is not used shall not exceed 15%*

*Opacity shall be determined by the procedures identified in 326 IAC 6-1-11.1(d) (1) through (9).*

Section C.5(b) – Fugitive Dust Emissions
ISG requests that IDEM identify 326 IAC 6-1-11.2 as the *Lake County Particulate Matter Contingency Measures* to avoid confusion. This section may also need to be revised to reflect the newly redesignated attainment area for PM10.

**Response 11:**

The provisions were not affected by Indiana's adoption of the federal attainment designation for PM-10. Rules that were developed to attain an air quality standard remain in place in order to maintain that standard. While any rule may change and be subsequently approved by the U.S. EPA as part of the State Implementation Plan, no action has been taken to revise this rule.

IDEM has chosen to add the requested expanded version. Condition C.5 (a) and (b) has been revised as requested. The changes to Condition C.5 are as follows:

C.5 Fugitive Dust Emissions [326 IAC 6-1-11.1]

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

(1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). **Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%) three (3) minute average. This includes material transfer to the initial hopper of a material processing facility as defined in 326 IAC 6-1-11.1(c) or**

**material transfer for transportation within or outside the source property including, but not limited to, the following:**

**(i) Transfer of slag product for use by asphalt plants:**

**(A) From a storage pile to a front end loader; and**

**(B) From a front end loader to a truck.**

**(ii) Transfer of sinter blend for use at the sinter plant:**

**(A) From a storage pile to a front end loader;**

**(B) From a front end loader to a truck; and**

**(C) From a truck to the initial processing point**

**(iii) Transfer of coal for use at a coal processing line:**

**(A) From a storage pile to a front end loader; and**

**(B) From a front end loader to the initial hopper of a coal processing line.**

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

(4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(5) **Wind erosion from storage piles and exposed areas.**
The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. **These limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the Permittee must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.**

(6) There shall be a zero (0) percent frequency of visible emission observations of a material during the in-plant transportation of material by truck or rail at any time. **Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in-plant transportation requirement.**

(7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(9) The PM10 emissions from building vents shall not exceed twenty-two-thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(11) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

(12) PM10 emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity

(13) Fugitive particulate matter from the material processing facilities **except at a crusher in which a capture system is not used** shall not exceed ten percent (10%) opacity.

**(14) Fugitive particulate matter from a crusher in which a capture system is not used shall not exceed fifteen percent (15%) opacity.**

**(15) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:**

**(A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.**

**(B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6-1-11.1(d)(9).**

Material processing facilities include crushers, screens, grinders, mixers, dryers, belt conveyors, bucket elevators, bagging operations, storage bins, and truck or railroad car loading stations.

**Opacity shall be determined by the procedures identified in 326 IAC 6-1-11.1(d) (1) through (9).** The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on December 15, 1993 and revised on August 15, 2002.

(b) The source is subject to 326 IAC 6-1-11.2 **(Lake County Particulate Matter Contingency Measures)** because it is subject to the requirements of 326 IAC 6-1-11.1 and 326 IAC 6-1-10.1(d). Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q) of this rule.

**Comment 12:**

<u>Sections C.2, C.3, C.7, C.8, (and other non-federally enforceable requirements throughout the permit)</u>
In these sections and throughout the permit, certain applicable provisions are designated “not federally enforceable.” ISG requests that IDEM add after each such designation the phrase, “or enforceable by citizens in accordance with the Clean Air Act.” Since general permit term B.3 expressly includes citizen enforceability unless otherwise excluded, the permit should clarify that “not federally enforceable” means “not enforceable by citizens under the Act” to avoid misunderstandings and the potential expense and burden of defending an unauthorized and unwarranted citizen suit.

**Response 12:**

IDEM, OAQ disagrees: Citizens have a right to sue the industries over the impact of pollution in the area under state law IC 13-30-1 et seq. There are specific standing requirements, notice to IDEM, Attorney General & Department of Natural Resources, in addition to other specific requirements and procedures. A complainant must always have legal standing to bring a lawsuit. The courts will make the determination of whether a citizen or citizens group has standing to bring the lawsuit after a citizen's suit has been filed. Specific provisions in conditions C.2, C.3, C.7 and C.8 have been identified as not federally enforceable in the draft permit. IDEM has revised the Condition C.7 in order to clarify what parts of the regulation are not federally enforceable as follows:

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~~(d), (e), and (f),~~ and 326 IAC 1-7-5**(a), (b) and** (d) are not federally enforceable.

**Comment 13:**

Section C.12(c) – Maintenance of Continuous Opacity Monitoring Equipment
ISG contends that the monitoring requirements in (c) are excessive and should be deleted from the permit. Federal requirements (in 40 CFR 60 & 63) do not require additional monitoring or replacement of COMs during periods of malfunction or breakdown. The Permittee is required to repair the monitor as soon as possible, record and report monitor down time and corrective action. ISG requests that IDEM permit conditions be no more stringent than the federal requirements.

In a recent federal register notice, USEPA took the position that the Title V program does not authorize a permit authority to enhance existing monitoring requirements provided in the underlying applicable rule. *See* 67 Fed. Reg. 58529 (proposing a settlement in Utility Air Regulatory Group v. EPA (No. 02-1290)). USEPA agreed that the "sufficient monitoring" language in 40 CFR 70.6(c)(1) does not establish an independent basis for placing enhanced monitoring requirements in a Title V permit. The Title V rules provide "gap filling" authority in 40 CFR 70.6(a)(3) when the underlying applicable requirement does not require any periodic testing or monitoring, but that is not the case for COM maintenance requirements. Since the underlying applicable requirement contains periodic monitoring maintenance for the COM, the Title V rules do not authorize the additional COM maintenance requirements in the draft permit. These additional requirements, and other enhanced monitoring requirements throughout the permit, should be deleted.

**Response 13:**

While the IDEM, OAQ recognizes the U.S. EPA's action and its interpretation of the federal provisions, the action does not affect the IDEM's ability or authority to require compliance monitoring in Part 70 permits. The provisions of 326 IAC 2-7-5(3) state that the Part 70 permits must include: "Monitoring and related record keeping and reporting requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements." The obligation to provide information to evaluate continuous compliance in 326 IAC 2-7-5(3) gives IDEM the legal authority to require monitoring when COM information is not available.

In the event of a COM malfunction which lasts four (4) hours or more, the Permittee will need to perform sufficient monitoring to be able to certify continuous compliance with the PM and opacity limits in the permit. The level of monitoring required by this condition is the minimum level of monitoring that is necessary for this source to have sufficient information to be able to certify continuous compliance with the PM and opacity limits in the permit when the COM is malfunctioning. IDEM has the authority under 326 IAC 2-7-5(3)(A)(iii) to require sufficient monitoring necessary to assure continuous compliance with the permit limits. The following changes have been made to Condition C.13 (previously C.12):

C.1~~2~~**3** Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.

**(b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.**

(c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

(d) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of ~~four (4)~~ **one(1)** hour~~s~~ or more, ~~a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible. If this is not possible, visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~ **compliance with the applicable opacity limits shall be demonstrated by the following:**

~~(1) If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~

~~(2) Method 9 opacity readings shall be repeated for a minimum of one (1) hour at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.~~

~~(3) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

**(1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.**

**(A) 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.**

**(B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.**

**(C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.**

**(2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.**

**(A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four**

**(24) hours after the start of the malfunction or down time.**

**(B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.**

**(C) Method 9 readings may be discontinued once a COM is online.**

**(D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.**

**(3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.**

(e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, 326 IAC 6-1-10.1(g)(2), 40 CFR 60 and/or 40 CFR 63**, Subpart FFFFF**.

**Comment 14:**

Section C.14 – Instrument Specification
Instrument accuracy limitation of +/- 2 percent is overly narrow considering instrument specifications to satisfy monitoring requirements for Federal NESHAP are typically +/- 5 percent. *See e.g.,* Steel Pickling MACT, 40 CFR 63.1162(b)(3) ("Each monitoring device must be certified by the manufacturer to be accurate within [+/-] 5 percent …"); 64 Fed. Reg. 33206 (June 22, 1999). ISG requests that this requirement be no more stringent than those found in NESHAP regulations and be changed to +/- 5 percent.

**Response 14:**

A blanket change shall not be made to all instruments within the facility. The plus or minus two percent (2%) was established to keep instrumentation measurements within an accurate range. If a State or Federal statute allows for a larger range, then that range shall apply only to equipment covered by that rule, the remaining equipment will remain in the plus or minus two percent (2%) requirement. The following change has been made to Condition C.15 (previously C.14):

C.14**5** Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (2%) of full scale reading**, unless State or Federal regulations provide for a different level of accuracy**.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately

ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Comment 15:**

Section C.15(b) – Emergency Reduction Plan
326 IAC 1-5-2 & 3 do not specify that the plan has to be certified by a "responsible official" as defined by 326 IAC 2-7-1(34). ISG requests that this certification requirement be removed from this section.

**Response 15:**

Pursuant to 326 IAC 2-7-6(1), compliance certification, testing, monitoring, reporting and record keeping requirements sufficient to assure compliance with the terms and conditions of a Part 70 Permit consistent with 326 IAC 2-7-5(3). Any document (including reports) required by a Part 70 Permit shall contain a certification by a "responsible official" that meets the requirements of 326 IAC 2-7-4(f). All reports or other submittal have to be certified by a responsible official as defined in 326 IAC 2-7-1(34). There is no change to condition C.16 (previously C.15) as a result of the comment.

**Comment 16:**

Section C.17 – Compliance Response Plans (CRP's)
"Compliance Response Plan" is a term that is not used or defined in the 1990 Clean Air Act or 40 CFR 70 – Title V State Operating Permit Program. There is no regulatory authority that requires a Compliance Response Plan and therefore all references in the permit should be deleted (or identified as not federally enforceable).

The Title V rules do not authorize the permitting authority to add a planning obligation where it is not required by the underlying rule. 40 CFR 70.6(a)(3)(i) states *"Each permit shall contain…periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit… Such monitoring requirements shall assure use of terms, test methods, units, averaging periods, and other statistical conventions consistent with the applicable requirement. Recordkeeping provisions may be sufficient to meet the requirements of this paragraph (a)(3)(i)(B)."* The rule requires that data be generated, recorded, and reported to the agency. Nothing in the Title V rules can be read to authorize the permitting authority to require a plan regarding how the Permittee must respond to the data generated. Instead, the Title V rules require prompt reporting of the actions taken after the fact. 40 CFR 70.6(a)(3)(iii)(B) states, *"Prompt reporting of deviations from permit requirements, including those attributed to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventative measures taken."* The rule implicitly recognizes that responding to upset and breakdown conditions cannot always be scripted in a plan. This reporting is required by permit term C.21. Extra planning requirements that are not authorized by federal rule, statute, or applicable requirement must be removed from the federally enforceable portions of the Title V permit.

**Response 16:**

An important goal of the Part 70 Operating Permit program is to assure that each Permittee has the ability to assure compliance with applicable requirements on a continuous basis.

During the development of the Part 70 permit program, IDEM worked with interested parties, such as the:

Clean Air Act Advisory Council's Permit Committee,
Indiana Manufacturing Association,
Indiana Chamber of Commerce, and
individual Part 70 sources.

A consensus was reached that written plans, outside of the permit document, such as the

Compliance Response Plan (CRP), are vital tools that the Permittee can implement to ensure compliance. Plans are also the documents to implement if an emission unit or air pollution control device deviates from its normal operation.

It is correct that 326 IAC 2-7-5 and 326 IAC 2-7-6 do not have or use the exact term "CRP" however, 326 IAC 2-7-6(6) provides the Department the authority to specify provisions in the Part 70 Operating Permit as the Commissioner may require with respect to ensuring compliance with applicable requirements. IDEM has determined that a CRP provision is necessary with respect to compliance assurance.

The requirement to develop and implement the plan does not prescribe any new applicable requirement. The CRP is a compilation or reasonable responses, schedules, work practices and other information developed by the Permittee from the standpoint of good business practices and the prevention of environmental problems. The Permittee has to implement these reasonable responses and schedules to maintain or return to compliance. The steps documented in the plan are reasonable actions to be taken for specific deviations that occur at the emission unit or control device.

Permittees already have maintenance schedules and trouble shooting guidelines that specify options and steps to be taken when the emission unit or control device is not operating or functioning properly. The Permittee has the knowledge, expertise and experience on how to operate the equipment at the plant, and is required to develop the CRP based on this knowledge, experience and expertise. The CRP maintains the documentation, such that changes in personnel will not hinder the proper operation of the emission unit and control device. The CRP provides the plant's employees a quick reference on how to respond when an emission unit or air pollution control device deviates from its normal operation, thus avoiding long periods of deviations. No change has been made to condition C.18 (previously C.17) as a result of this comment.

**Comment 17:**

Section C.19 (b) – Annual Emission Statement
Certification of the Emission Statement is required by 326 IAC 2-6-4 but not necessarily by a "responsible official" as defined by 326 IAC 2-7-1(34). The permit terms should be revised to more accurately reflect the underlying certification requirement and delete all references to "responsible official."

Section C.19 (d) – Annual Emission Statement
Delete (d), it is identical to C.19(c) in the same section.

**Response 17:**

All reports or submittals require certification by "responsible official". Therefore IDEM will not delete the certification requirement in condition C.20 (previously C.19). See Response 15. See also change 4.

**Comment 18:**

<u>Section C.23 – Part 2 MACT Application Submittal Requirement</u>
The Integrated Iron and Steel MACT, 40 CFR 63, Subpart FFFFF, has been promulgated as a final rule. Therefore, the Part 2 MACT application requirement in Section 112(j), which is triggered only if USEPA misses a deadline for promulgating a MACT standard for an applicable source category, is not relevant to ISG and this provision may be deleted from the permit.

**Response 18:**

Since all applicable National Emission Standards for Hazardous Air Pollutants (NESHAPs) for this source have been promulgated, IDEM OAQ agrees and condition C.23 has been removed as follows:

~~**Part 2 MACT Application Submittal Requirement**~~

~~C.23 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 MACT Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

~~Indiana Department of Environmental Management~~
~~Compliance Data Section, Office of Air Quality~~
~~100 North Senate Avenue, P.O. Box 6015~~
~~Indianapolis, Indiana 46206-6015~~

~~and~~

~~United States Environmental Protection Agency, Region V~~
~~Director, Air and Radiation Division~~
~~77 West Jackson Boulevard~~
~~Chicago, Illinois 60604-3590~~

**Comment 19:**

Section D.1.1 – General Provisions Relating to HAPs
Please revise the inaccurate date (May 30) in this section. 40 CFR 63 Subpart FFFFF was published in the Federal Register on May 20, 2003 (68 Fed. Reg. 27646) with an effective date of May 20, 2003.

**Response 19:**

The following change has been made to condition D.1.1 (See Change 9 for additional changes):

D.1.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [Table 4 to 40 CFR 63, Subpart FFFFF]

The provisions of 40 CFR 63, Subpart A- General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected sources, No. 3 Blast Furnace and No. 4 Blast Furnace, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee must comply with these requirements on and after May ~~3~~**2**0,2003.

**Comment 20:**

Section D.1.2 – Subpart FFFFF MACT requirements
Revise (b) to read, "The following Blast Furnace emission points are subject to 40 CFR 63, Subpart FFFFF." By referring to the roof monitors and baghouse as the emission units that "comprise the affected sources", the draft permit language is creating a definition of "affected source" that is inconsistent with the MACT rule. The Iron and Steel Manufacturing MACT rule defines affected sources to include each new and existing sinter plant, blast furnace, and basic oxygen process furnace shop (including ancillary equipment). *See* 40 CFR 63.7782. The broad MACT definition of affected source does not increase the number of emission points subject to emission limitations, but it does identify the equipment evaluated for regulation as part of this MACT source category. Thus, for example, blast furnace gas cleaning equipment and blast furnace stoves can be excluded from regulation under other MACT standards because they are part of the blast furnace affected source covered by the Iron and Steel Manufacturing MACT standard.

**Response 20:**

Condition D.1.2 (b) has been revised as follows:

(b) The following **Blast Furnace** emissions **points** ~~units comprise the affected sources that~~ are subject to 40 CFR 63, Subpart FFFFF:

(1) No. 3 Blast Furnace Casthouse Roof Monitor (V1A);

(2) No. 4 Blast Furnace Casthouse Roof Monitor (V1B); and

(3) No. 4 Blast Furnace Casthouse Baghouse (S1B)

**Comment 21:**

Section D.1.4 – Particulate Matter 326 IAC 6-1-2
Grain loading limits for non-stack sources such as No. 3 and No. 4 Blast Furnace Roof Monitors (V1A and V1B) cannot be verified through source testing. The permit should expressly state that ISG may certify compliance with these limits for the No. 3 and No. 4 Blast Furnace Roof Monitors on the basis that it has complied with the control device operating requirements in D.1.9 (d) or by demonstrating compliance with the existing casthouse MACT standard of 20% opacity (6 minute average) using a Method 9 performance test.

**Response 21:**

326 IAC 2-7-6(5)(C) requires the Permittee to identify the methods for determining compliance status. These methods are not limited to those contained in the Part 70 Permit. The U.S. EPA and IDEM recognize the use of any credible evidence to support the annual compliance certification. Monitoring required by the permit may be supplemented with any other credible evidence as a basis for certifying compliance. The monitoring provisions of D.1.9 and the 20% opacity standard that is currently applicable (326 IAC 5-1-2) may well be the most credible available evidence for certifying compliance; however, the Part 70 permit does not specifically limit the evidence to be used to demonstrate compliance or noncompliance. No change has been made as a result of this comment.

**Comment 22:**

Section D.1.5 – Sulfur Dioxide (SO2) Limitations
IDEM and ISG are currently working together through the rule making process to revise the SO2 limitations for both blast furnace stove stacks located at the Indiana Harbor Works. The limits will be changed to 0.29 lbs/MMBtu and 127.89 lbs/hr for No. 3 Blast Furnace Stove Stack and 140.94 lbs/hr for No. 4 Blast Furnace Stove Stack. These new limits have been modeled with no adverse effects to the environment and IDEM will include in the future SIP revision for redesignation of Lake County as attainment for SO2. ISG therefore requests that IDEM submit the new limits immediately for SIP approval and encourage USEPA to act on this SIP revision as soon as possible. The Title V Permit should not be issued until the SO2 limits have been corrected. Alternatively, the permit could expressly state that the new SO2 limits are the enforceable emission limits pending USEPA action on the SIP revision.

**Response 22:**

The Part 70 Permit contains the applicable limits at the time of permit issuance. IDEM doesn't plan to delay issuance of Part 70 Permit during the rule revision process. When the final action to revise the applicable limitations are completed, the Permittee can submit a request to IDEM to revise the permit accordingly. No changes have been as a result of this comment.

**Comment 23:**

Section D.1.6 – Preventative Maintenance Plan (and throughout the permit including: D.2.6, D.3.6, D.4.3, D.5.10, D.6.6, and D.7.5)
The scope and content of a PMP is dictated by 326 IAC 1-6-3. The PMP must identify who is responsible for maintaining each control device, what they will inspect, and what replacement parts they will have on site to ensure prompt repairs. The rule does not require PMPs for facilities or portions of facilities that do not use control devices to ensure compliance. Therefore, the last phrase for this permit term should be revised to read, "*[A PMP] is required for control devices operated at this facility to ensure compliance with applicable requirements."*

**Response 23:**

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5 (13). This rule refers back to the Preventive Maintenance Plan requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility, which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3 (a) (2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. 326 IAC 1-6-3(b) provides that "...as deemed necessary by the commissioner, any person operating a facility shall comply with the requirements of subsection (a) of this section."

In addition to preventive maintenance performed on the control devices, preventive maintenance should also be performed on the emission units themselves because lack of proper maintenance on the units can result in increased emissions. Many types of facilities require maintenance in order to prevent excess emissions.

There is no change to the permit as a result of this comment.

**Comment 24:**

Section D.1.7 (and throughout the permit)
When paraphrasing federal rule requirements here and elsewhere in the permit, ISG requests that language be added that preserves all flexibility afforded by the rule in the event that some portion of the rule has been omitted. Please add, "*In restating the applicable requirements in a form appropriate for this permit, it is not the Agency's intent to make these requirements, in any way, more stringent than the applicable rules*."

**Response 24:**

It is not IDEM's intent to make requirements more stringent that the applicable rules. However to include every requirement irrespective of compliance options chosen by the Permittee, word for word would create a large permit. The compliance date for the National Emission Standards for Hazardous Air Pollutants from Integrated Iron and Steel Manufacturing - 40 CFR 63, Subpart FFFFF is May 22, 2006. At this time, no information is available with IDEM about how the Permittee intends to comply with the rule. Therefore, IDEM cannot include detailed requirements specific to facilities at this source. The Permit Modification provision is included in the permit to incorporate detailed NESHAP requirements. At this time, IDEM is including short language to comply with Part 70 content obligation.

**Comment 25:**

Section D.1.9(c) – Control Device Operation
This requirement implies that the No. 4 Blast Furnace Baghouse operates continuously, when in fact, it operates only when the furnace is casting (removing slag and iron from the furnace). ISG requests that the wording be changed to *"…when the No. 4 Blast Furnace is casting."*

**Response 25:**

IDEM agrees to the change to Condition D.1.9(c) as follows:

D.1.9 Control Device Operation

(a) The No. 3 Blast Furnace shall be equipped with excess gas bleeder flare. The pilot flame for the flare shall be present at all times the Blast Furnace is in operation in order to minimize CO emissions.

(b) The No. 4 Blast Furnace shall be equipped with excess gas bleeder flare. The pilot flame for the flare shall be present at all times the Blast Furnace is in operation in order to minimize CO emissions.

(c) The No. 4 Blast Furnace Casthouse Baghouse shall be in operation at all times when the No. 4 Blast Furnace is ~~in operation~~ **casting**.

**Comment 26:**

Section D.1.9 (d) – Control Device Operation
This requirement is somewhat vague and should be changed to clarify procedures as follows:

*(d) In order to minimize particulate roof monitor emissions to comply with D.1.4:*

*(1) The iron and slag runners shall be equipped with covers and natural gas fired lances placed in appropriate areas at the No. 3 Furnace for fume suppression during the cast.*

*(2) The iron and slag runners shall be equipped with covers and natural gas fired lances placed in appropriate areas at the No. 4 Furnace for fume suppression during the cast.*

*(3) The iron and slag runner covers can be removed during a cast for required maintenance/malfunction and shall be promptly returned to position as soon as practicable*.

*(4) At No. 3 and No. 4 Furnace, the trough hood (cover) shall be placed over the iron trough as soon as practical after drilling the taphole and remain in place during the cast until just prior to taphole closing. The hood may be removed during the cast only for required maintenance/malfunction and be promptly returned to position as soon as practicable.*

**Response 26:**

IDEM has agreed to the following changes to Condition D.1.9(d):

(d) In order to **minimize PM emissions to** comply with D.1.4:

(1) The iron and slag runners **shall be equipped with covers and natural gas fired lances placed in appropriate areas** at the No. 3 Blast Furnace ~~shall be equipped with covers and natural gas fired lance~~ for fume suppression during the cast**.** ~~to minimize PM emissions~~

(2) The iron and slag runners **shall be equipped with covers and natural gas fired lances placed in appropriate areas** at the No. 4 Blast Furnace ~~shall be equipped with covers and natural gas fired lance~~ for fume suppression during the cast**.** ~~to minimize PM emissions~~

(3) The **iron and slag** runner covers can be removed during **a cast for required maintenance/malfunction** ~~the tap hole drilling or closing operation~~ and shall be promptly returned in position ~~to cover the runners in casthouse during a cast~~.

**(4) At No. 3 and No. 4 Furnace, the trough hood (cover) shall be placed over the iron trough as soon as practical after drilling the taphole and remain in place during the cast until just prior to taphole closing. The hood may be removed during the cast only for required maintenance/malfunction and be promptly returned to position.**

**Comment 27:**

<u>Section D.1.10 – Continuous Compliance Plan (CCP)</u>
ISG requests that IDEM not paraphrase the CCP requirements found in 326 IAC 6-1-10.1. We suggest that IDEM replace the existing draft permit language with:
*The plan shall contain the requirements specific for iron production that includes blast furnaces identified in 326 IAC 6-1-10.1(p)(3)(C).*
*The plan shall contain the operation and maintenance requirements for particulate matter control equipment identified in 326 IAC 6-1-10.1(q).*
*The plan shall contain the recording, inspection, and maintenance procedures for a facility controlled with a baghouse identified in 326 IAC 6-1-10.1(r)(1).*

**Response 27:**

IDEM OAQ has decided to add a condition in Section C of the Part 70 Permit pertaining to the requirements regarding a Continuous Compliance Plan (CCP), subsequently all remaining Section C conditions have been renumbered. In addition Condition D.1.10 has been removed and all subsequent conditions have been renumbered. The recordkeeping requirement for CCP has been removed from D.1.16 (b) and remaining requirements renumbered. The following changes have been made:

**C.12 Continuous Compliance Plan [326 IAC 6-1-10.1(l)] [326 IAC 6-1-10.1(u)]**

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

**(b) Pursuant to 326 IAC 6-1-10.1(u), the Permittee shall update the CCP, as needed, retain a copy any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP to IDEM, OAQ within thirty (30) days of the update.**

**(c) Pursuant to 326 IAC 6-1-10.1, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6-1-10.1.**

~~D.1.10 Continuous Compliance Plan [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCPs were submitted to IDEM. The plans include the following:~~

~~(a) Pursuant to 326 IAC 6-1-10.1(p)(3)(C), the plans for iron production that includes, blast furnaces shall include the following:~~

~~(1) the capture system~~

~~(2) procedures used to minimize dirt and debris accumulated on the facility floor~~

~~(3) fume suppression system~~

~~(4) record keeping for the iron production cycle~~

~~(5) the blast furnace inspection, repair and maintenance schedule~~

~~(6) the procedures used to inspect and operate the blast furnace gas cleaning equipment~~

~~(b) Pursuant to 326 IAC 6-1-10.1(q), the plans for the particulate matter control equipment shall include operation and maintenance requirements~~

~~(c) a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures~~

D.1.16 Record Keeping Requirements

(a) To document compliance with Conditions D.1.5 and D.1.14, the Permittee shall maintain the following records:

(1) Records of the total coke oven gas, blast furnace gas, fuel oil, and natural gas usage for each day at the No. 3 and No. 4 Blast Furnaces.

(2) Records of the average sulfur content and heating value for each day for each fuel type used during the calendar quarter.

(3) Records of any compliance emissions calculations.

~~(b) To document compliance with Condition D.1.10, the Permittee shall maintain at the source a copy of the Continuous Compliance Plan (CCP) and perform the inspections, monitoring and record keeping requirements in accordance with the Permittee's CCP.~~

**Comment 28:**

Section D.1.11 and D.1.17 – VE Notations and Record Keeping Requirements
Once per shift monitoring is overly burdensome and unnecessary to demonstrate compliance. ISG requests that monitoring start on a daily basis with the opportunity for less frequent monitoring upon demonstrating consistent compliance.

**Response 28:**

326 IAC 2-7-5(3) specifically requires that the permit include monitoring requirements to ensure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Compliance monitoring conditions such as this requirement to perform visible emission notations are required in order to demonstrate continuous compliance with the permit requirements. Visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6-1. Since bag failure can occur suddenly and without warning, possibly causing a violation of 326 IAC 5-1 or 326 IAC 6-1, the OAQ does not believe that daily notations would be sufficient for the Permittee to demonstrate continuous compliance. Once per shift visible emission notations are reasonable and necessary in order to demonstrate continuous compliance. The condition already states that visible emissions shall be performed once per shift during normal daylight operations. There has been no change to condition D.1.10 (previously D.1.11) and D.1.16 (previously D.1.17) as a result of this comment.

**Comment 29:**

Section D.1.12 – Parametric Monitoring
The normal differential pressure operating range for the No. 4 Blast Furnace Casthouse Baghouse is 3.0 to 18.0 inches of water.

**Response 29:**

Condition D.1.12 (previously condition D.1.11) has been changed as follows:

D.1.1~~1~~**2** Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the pressure drop across the baghouse used in conjunction with the No. 4 Blast Furnace Casthouse Baghouse (S1B), at least once per shift when the above processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~2.5-6.5~~ **3.0 to 18.0** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

**Comment 30:**

ISG objects to parametric monitoring here (*condition D.1.11, now condition D.1.12*) and throughout the permit to the extent that it adds obligations that are not specified in an underlying applicable rule or permit condition. Title V was intended to gather all existing requirements into one place to improve compliance and transparency, but without imposing new obligations. ISG requests that all

new obligations that are not specifically required by an underlying applicable requirement be removed from the permit.

To the extent that a differential pressure parametric range is retained in the permit for this or any baghouse, the permit should state that readings outside of the established range after bag changes, or during other temporary events that normally occur, should not trigger further evaluation or responsive actions. Also, the parametric range should be extended to include differential pressures recorded during a stack test demonstrating compliance, but a wholly new range should not be established based on a three-hour snap shot during testing. Therefore, ISG requests that IDEM revise the fourth line of this paragraph as follows: "or a range ***extended to include values*** established during the latest stack test"

**Response 30:**

326 IAC 2-7-5(3) specifically requires that the permit include monitoring requirements to ensure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Compliance monitoring conditions such as this requirement to keep pressure drop records are required in order to demonstrate continuous compliance with the permit requirements. Parametric monitoring requirements are used to indicate compliance with 326 IAC 6-1. Since bag failure can occur suddenly and without warning, possibly causing a violation of 326 IAC 6-1, the OAQ does not believe that daily checks would be sufficient for the Permittee to demonstrate continuous compliance. Once per shift monitoring of pressure drop is reasonable and necessary in order to demonstrate continuous compliance. The condition also allows for a range established in a stack test to be used. A CRP for the baghouse can incorporate as a response step that "after a bag replacement, a pressure drop reading outside the range may not require an additional response step" for certain duration. This duration should be established by the Permittee, by reviewing the performance of the baghouse. There has been no change to the frequency of the parametric monitoring requirements as a result of this comment.

**Comment 31:**

<u>Section D.1.14(b) – Broken or Failed Bag Detection (and throughout the permit)</u>
Sources with opacity limitations should be allowed to continue to operate as long as the emissions during control device failure are in compliance with the applicable opacity limitation. We suggest that the language in (b) be replaced with the following language patterned after Section D.3.16b:

"For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings or if a bag failure is detected by some other means, and if the failure is causing abnormal visible emissions that may be violating opacity limits, then failed units and any associated process relying on the control device to comply with an applicable emission limitation will be shut down immediately until the failed units have been repaired or replaced. Operations may continue if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit."

This language should also be used in D.3.16 (b).

Also, in paragraph (a), the obligation to take response steps should be taken within eight (8) "operating" hours instead of eight (8) "business" hours. Obviously, if the source of emissions is not operating, ISG should not be obligated to expedite its response steps.

**Response 31:**

The department has determined, on a case by case basis, that the 'blanking or isolating' can be an acceptable action for broken or failed bags, because this would not affect the reasonable assurance of compliance. The equipment using baghouse as control can 'blank or isolate' individual bags while maintaining the baghouse operation at the optimum level.

IDEM believes this condition does allow the flexibility of following the time frames for responding to broken or failed bags as listed in the CRP. This condition does not require that all response steps be implemented within 8 hours of the failure. Rather, this condition requires that response steps **according to the timetable described in the CRP**, be **initiated** (emphasis added) within 8 hours of the failure. IDEM is only requiring that the Permittee begin the process of addressing the failure within 8 hours. The actual process itself and the timetable for completing each step of the process should be followed as described in the CRP. Additionally, IDEM would like to clarify that shutting down the emission unit within 8 hours of the failure is one option that would be considered to fulfill the requirement of initiating a response step to address the failure. No changes to the permit are necessary.

The conditions D.1.13 (previously D.1.14), and D.3.15 (previously D.3.16) are revised as follows:

D.1.1~~4~~**3** Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired**,** ~~or~~ replaced**, blanked or isolated**. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.

(b) For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows,** then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Emergency Provisions).

D.3.1~~6~~**5** Broken or Failed Bag Detection [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired**,** ~~or~~ replaced**, blanked or isolated**. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section C - Emergency Provisions).

**Comment 32:**

D.1.19 *(now D.1.18)* – Requirements to Submit …(and D.2.25, D.3.20 below)
The Title V permit has incorporated the applicable requirements of the Subpart FFFFF MACT standard. ISG asks that this permit term be removed as unnecessary. If the Notification of Compliance status includes information that needs to be incorporated into the Title V Permit, a decision can be made at that time regarding how the permit may be revised to reflect those changes (e.g., significant, minor or administrative changes).

**Response 32:**

IDEM, OAQ recognizes that the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) are new and that the owner or operator most likely does not currently know exactly which option or options will be chosen to comply with the rule. As a result, it is necessary for the owner or operator to modify the permit later to include the compliance options that will be chosen as well as the additional monitoring, record keeping, and reporting requirements for the options chosen. Adding the specific compliance options chosen to the permit will significantly change existing monitoring, record keeping, and reporting terms of the Part 70 permit such that a significant permit modification will be required in accordance with 326 IAC 2-7-12(d)(1). The NESHAP requirements will not be covered by the permit shield until the specific compliance options are incorporated into the permit. The owner or operator must begin to comply with the NESHAP requirements starting on the compliance date. To help ensure that the permit shield will be in effect for the NESHAP requirements on the compliance date, IDEM, OAQ is requiring that the significant permit modification application be submitted nine months prior to the compliance date.

**Comment 33:**

Section D.1.20 *(now D.1.19)*– Reporting Requirements
326 IAC 7-4-1.1 does not specify that the SO2 quarterly report has to be certified by a "responsible official" as defined by 326 IAC 2-7-1(34). ISG requests that this certification requirement be removed from this section.

**Response 33:**

Pursuant to 326 IAC 2-7-6(1), all reports or submittals require certification by "responsible official". Therefore IDEM will not delete the certification requirement. See Response 15.

**Comment 34:**

Section D.2.1 – General
Typo: First line "63m Subpart A" should be "63, Subpart A"

**Response 34:**

Condition D.2.1 has been corrected as follows (See Change 9 for additional changes):

D.2.1 General Provisions Relating to HAPs [326 IAC 20-1][40 CFR 63, Subpart A] [able 4 to 40 CFR 63, Subpart FFFFF]

The provisions of 40 CFR 63~~m~~ Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1-1, apply to the affected source, Sinter Plant, except when otherwise specified by Table 4 to 40 CFR 63, Subpart FFFFF. The Permittee shall comply with these requirements on and after May 20, 2003.

**Comment 35:**

Section D.2.2 – Subpart FFFFF MACT requirements
Revise (b) to read, "The following Sinter Plant emission points are subject to 40 CFR 63, Subpart FFFFF." By referring to the main windbox, sinter discharge and sinter cooler roof as the emission units that "comprise the affected source", the draft permit language is creating a definition of "affected source" that is inconsistent with the MACT rule. The Iron and Steel Manufacturing MACT rule defines affected sources to include each new and existing sinter plant, blast furnace, and basic oxygen process furnace shop (including ancillary equipment). *See* 40 CFR 63.7782. The broad MACT definition of affected source does not increase the number of emission points subject to emission limitations, but it does identify the equipment evaluated for regulation as part of this MACT source category. Thus, the portions of the sinter plant not specifically subject to an emission limitation can be excluded from regulation under other MACT standards because they are part of the sinter plant affected source covered by the Iron and Steel Manufacturing MACT standard.

**Response 35:**

Condition D.2.2 has been revised as follows:

D.2.2 National Emissions Standards for Hazardous Air pollutants from Integrated Iron and Steel Manufacturing - Emission Limitations for Sinter Plants [40 CFR 63, Subpart FFFFF] The Permittee must comply with these requirements on and after May 22, 2006.

(a) The provisions of 40 CFR 63, Subpart FFFFF (National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing) apply to this source. The Permittee shall comply with these requirements on or after May 22, 2006 for the affected source, the Sinter Plant.

(b) The following **Sinter Plant** emission ~~units~~ **points are** ~~comprise the affected source that is~~ subject to ~~specific requirements of~~ 40 CFR 63, Subpart FFFFF: main windbox (S2A), sinter plant discharge (S2B) and sinter cooler.

**Comment 36:**

Section D.2.3(b) Particulate Matter
TYPO: First line of (b): delete "shall not" which is repeated twice.

**Response 36:**

Condition D.2.3 has been corrected as follows:

D.2.3 Particulate Matter [326 IAC 6-1-10.1(d)]

Pursuant to 326 IAC 6-1-10.1(d) TSP emissions from the Sinter Plant operations shall not exceed the following:

(a) TSP emissions from the windbox exhausting to stack (S2A) (identified in 326 IAC 6-1-10.1(d) as "stack 08") shall not exceed 0.02 grains per dry standard cubic foot of exhaust air and 49.70 pounds per hour.

(b) TSP emissions from the sinter plant discharge (breaker) exhausting to stack (S2B) shall not ~~shall not~~ exceed 0.02 grains per dry standard cubic foot of exhaust air and 18.05 pounds

per hour.

**Comment 37:**

Section D.2.5(c) – Sinter plant VOC
ISG requests that IDEM delete the parenthetical in paragraph (c) which states "(either one (1) hour or eight (8) hour)" and leave the permit condition silent as to the applicable ozone NAAQS standard. Over the 5-year permit term, the applicable standard defining a violation of the NAAQS for ozone is expected to change as the new 8-hour standard becomes fully implemented. The parenthetical is unnecessary to imposing the obligation in this permit term. ISG requests that IDEM delete this excess language in order to eliminate the need for a future permit modification to conform to expected rule developments.

**Response 37:**

IDEM agrees to the change, in addition 326 IAC 8-13-3(c) requirements were omitted from the draft permit and has been added as D.2.5 (b). The conditions have been renumbered accordingly. Condition D.2.5 has been revised as follows:

D.2.5 Sinter Plant Volatile Organic Compounds (VOCs) [326 IAC 8-13-3]

**(a)** Pursuant to 326 IAC 8-13-3(b) and (c) sinter plant windbox gas VOC emissions shall be limited as follows:

(~~a~~**1**) During the period of May 1 through September 30, the total VOC (seasonal cap) emission limit is calculated and shall not exceed 143,973.0 lbs of VOC per ozone season

(~~b~~**2**) Except as provided in 326 IAC 8-13-3(b)(3), on any day from May 1 through September 30, the sinter plant windbox exhaust VOC emissions (the maximum daily limit) limit is calculated and shall not exceed 1001.3 lbs of VOC per day.

(~~c~~**3**) On any day from May 1 through September 30 when ozone levels in Lake, Porter or LaPorte Counties are expected to exceed the national ambient air quality standard for ozone ~~(either one (1) hour or eight (8) hour)~~, the sinter plant windbox exhaust VOC emissions (the lower daily limit) limit is calculated and shall not exceed 941.0 lbs of VOC per day.

A high ozone level day shall be predicted by the Permittee in accordance with a high ozone day action plan developed by the source and submitted to the IDEM, OAQ as part of the report required by 326 IAC 8-13-4(b).

**(b) From October 1 through April 30, sinter plant windbox exhaust gas VOC emissions shall be limited to thirty-six hundredths (0.36) pound per ton of sinter produced. The limit shall be complied with on an operating day average basis.**

**Comment 38:**

Section D.2.5(d)(8) – Sinter Plant Volatile Organic Compounds (VOCs)
On October 8, 2003, ISG notified IDEM (Compliance Data Section) that it has revised its method of predicting high ozone days. ISG shall rely on IDEM's "Partners for Clean Air" ozone action day notification to predict high ozone days. ISG requests that this change be included in this permit section. (See attached letter.)

**Response 38:**

Condition D.2.5 has been revised as follows:

D.2.5 Sinter Plant Volatile Organic Compounds (VOCs) [326 IAC 8-13-3]

(~~d~~**c**) Pursuant to 326 IAC 8-13-4(b)(8) and an Ozone Action Plan Approval letter date stamped September 7, 1999, the Permittee shall do the following:

(8) The Permittee ~~shall predict high ozone days by contracting the weather service, Murray and Trettel, Inc. The prediction will be based on IDEM's notification program and guidance.~~ **shall use IDEM's "Partners for Clean Air" ozone action day notification to predict high ozone days.**

**Comment 39:**

Section D.2.6 – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 39:**

See Response 23.

**Comment 40:**

Section D.2.9 – Testing Requirements (and throughout the permit)
ISG particulate limits listed in the SIP were based on USEPA method 5 front half particulate only. ISG requests that a statement be inserted in this section stating that TSP testing includes front half particulate only. This is necessary to ensure that future particulate testing will be using the same method that was used when the emission limitations were established.

**Response 40:**

326 IAC 6-1-10.1(f)(2) specifies the methods required to measure emissions of TSP matter and should be followed. The following change has been made to Condition D.2.9.

D.2.9 Testing Requirements [326 IAC 2-7-6(1), (6)]

Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform TSP and SO2 testing on the sinter plant windbox exhaust (S2A) using methods as approved by the Commissioner, in order to demonstrate compliance with conditions D.2.3 and D.2.4. **Testing shall be performed using a test method that is listed in 326 IAC 6-1-10.1(f)(2) and is approved by the Commissioner.** These tests shall be repeated at least once every two and a one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

**Comment 41:**

Section D.2.12 – Continuous Compliance Plan (CCP)
ISG requests that IDEM not paraphrase the CCP requirements found in 326 IAC 6-1-10.1. We suggest that IDEM replace the existing draft permit language with:
*The plan shall contain the requirements specific for sinter production identified in 326 IAC 6-1-10.1(p)(3)(D).*
*The plan shall contain the operation and maintenance requirements for particulate matter control equipment identified in 326 IAC 6-1-10.1(q).*
*The plan shall contain the recording, inspection, and maintenance procedures for a facility controlled with a scrubber identified in 326 IAC 6-1-10.1(r)(3).*

**Response 41:**

IDEM OAQ has decided to add a condition into Section C of the Part 70 Permit (see response 27)

for the requirements regarding a Continuous Compliance Plan (CCP), subsequently all remaining Section C conditions have been renumbered. In addition Condition D.2.12 has been removed and all subsequent conditions have been renumbered. The recordkeeping requirement for CCP has been removed from D.2.22 (f) (previously condition D.2.23) and remaining requirements renumbered. The following changes have been made:

~~D.2.12 Continuous Compliance Plan [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCPs were submitted to IDEM. The plans include the following:~~

~~(a) Pursuant to 326 IAC 6-1-10.1(p)(3)(D), the plans for sinter production shall include the following:~~

~~(1) routine startup and shutdown procedures and other work practices which are followed to reduce emissions and equipment malfunctions.~~

~~(2) procedures for inspection of equipment to identify areas which may affect particulate emissions~~

~~(3) procedures for monitoring mechanical and electrical inspection records.~~

~~(4) procedures used to minimize dirt and debris accumulation on the facility floor~~

~~(5) procedures for monitoring burden parameters, including base to acid ratio and hydrocarbon content~~

~~(6) routine for plant operation during equipment failure, such as screening station failure~~

~~(7) inspect the operational status of the capture systems~~

~~(8) records of the inspections and any repairs.~~

~~(b) Pursuant to 326 IAC 6-1-10.1(q), the plans for the particulate matter control equipment shall include operation and maintenance requirements~~

~~(c) Pursuant to 326 IAC 6-1-10.1(r)(3), the plans for a facility controlled with a scrubber shall include the recording, inspection, and maintenance procedures~~

D.2.2~~3~~**2** Record Keeping Requirements

~~(f) To document compliance with Condition D.2.12, the Permittee shall maintain at the source a copy of the Continuous Compliance Plan (CCP) and perform the inspections, monitoring and record keeping requirements in accordance with the Permittee's CCP.~~

**Comment 42:**

Section D.2.14 *(now D.2.13)*– VE Notations
Paragraph (e) should be deleted. (See comment on Section C.17 above).

For paragraph (a), once per shift monitoring is overly burdensome and unnecessary to demonstrate compliance. ISG requests that monitoring start on a daily basis with the opportunity for less frequent monitoring upon demonstrating consistent compliance.

**Response 42:**

See Responses 16 and 28.

**Comment 43:**

Section D.2.15 *(now D.2.14)*– Parametric Monitoring (See comment on D.1.12 above)
The normal operating ranges associated with the windbox scrubber are:
differential pressure – 15 to 55 inches of water
scrubber water flow – 1800 gpm minimum
The normal operating ranges associated with the discharge scrubber are:
scrubber water flow – 200 gpm minimum differential pressure – this scrubber does not currently have the instrumentation to determine differential pressure across the scrubber. Per the compliance monitoring requirements found in this permit (Section C.11), ISG shall have 90 days after permit issuance to install related monitoring equipment. The operating range should be administratively included into the permit once determined and that range should be extended as appropriate to reflect other differential pressure values that are monitored during normal operating conditions.

**Response 43:**

Condition D.2.14 (previously condition D.2.15) has been changed to reflect the new data provided. Once the instrumentation has been installed, the permit should be amended to include a more accurate range for the control equipment.

D.2.1~~5~~**4** Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

(a) The Permittee shall record the total static pressure drop across to the windbox main scrubber used in conjunction with the sinter plant operations, at least once per shift when the windbox (S2A) is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the windbox main baghouse is outside the normal range of ~~4.0 and 9.0~~ **15 to 55** inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the windbox main scrubber used in conjunction with the sinter plant operations, at least once per shift when the windbox is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is ~~outside the normal range~~ **below the minimum rate** of ~~29-69~~ **1800** gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) The Permittee shall record the total static pressure drop across the sinter plant discharge (breaker) scrubber (S2B) used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the discharge (breaker) scrubber is outside the normal range of 8.0 and 12.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. The Permittee shall record the water flow rate to the sinter plant discharge (breaker) scrubber used in conjunction with the sinter plant operations, at least once per shift when the breaker is in operation when venting to the atmosphere. When for any one reading, the flow rate of the scrubber is ~~outside the normal range~~ **below the minimum rate** of ~~900-1500~~ **200** gpm or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a

deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

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

**Comment 44:**

Section D.2.17 & D.2.19 *(now D.2.16 and D.2.18)*– Sinter Plant Scrubber and Cyclone Failure Point and area sources have opacity limitations and should be allowed to continue to operate as long as the emissions during control device failure are in compliance with the applicable opacity limitation. ISG suggests the following language be added to each Section:
*"Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of the permit (Section B- Emergency Provisions)* ***or the resulting emissions are in compliance with the applicable opacity limitation.****"*

**Response 44:**

The intent of the Part 70 permit program is to ensure continuous compliance with the applicable requirements. Unless opacity is measured continuously, continuous compliance is not verifiable. Equipment shutdown to carryout the repairs is the only option. If the Permittee agrees to install a continuous monitoring system (COMS), IDEM can develop flexibility into the condition. The condition allows for continued operations for emergencies. No change has been made as a result of this comment.

**Comment 45:**

<u>Section D.2.23 *(now D.2.22)*-- Record Keeping Requirements (and throughout the permit)</u>
Once per shift monitoring is overly burdensome and unnecessary to demonstrate compliance. ISG requests that monitoring start on a daily basis with the opportunity for less frequent monitoring upon demonstrating consistent compliance.

**Response 45:**

See Responses 28 and 30.

**Comment 46:**

<u>D.2.25 *(now D.2.24)*– Requirements to Submit …</u>
Delete this section. *See* Comment for D.1.19 above.

**Response 46:**

See Response 32.

**Comment 47:**

<u>Section D.3(c)(4) – Facility Description</u>
Change the Vacuum Degas Flare Stack emission unit id from (S3C) to *(S3D).*

**Response 47:**

This change has been made. See Response 6.

**Comment 48:**

Section D.3.2 – NESHAP
Based on discussions with USEPA in connection with the appeal of the Iron and Steel MACT Standard, vacuum degassers are not controlled sources under the standard. ISG requests that this clarification for an unintentionally over-broad definition of ladle metallurgy be corrected in this permit by stating at the end of D.3.2 (b) that "The MACT emission limitations do not apply to vacuum degassing operations."

**Response 48:**

The maximum achievable control technology (MACT) standard at 40 CFR 63, Subpart FFFF, specifically identifies the affected sources subject to the standard in 40 CFR 63.7782(b). The process emissions included in the affected source are specified in 40 CFR 63.7782(c) as, "the sinter plant windbox exhaust, discharge end, and sinter cooler; the blast furnace casthouse; and the BOPF shop including each individual BOPF and shop ancillary operations (hot metal transfer, hot metal desulfurization, slag skimming, and ladle metallurgy)." The definition of ladle metallurgy currently in 40 CFR 63.7852 is "a secondary steelmaking process that is performed typically in a ladle after initial refining in a basic oxygen process furnace to adjust or amend the chemical and/or mechanical properties of steel." The permit condition currently includes a reference indicating that the definitions in 40 CFR 63.7852 are applicable. While US EPA may have indicated that vacuum degassers are not controlled sources under the standard in discussions connected with the litigation associated with 40 CFR 63, Subpart FFFFF, the definition and requirements in 40 CFR 63, Subpart FFFFF do not currently specifically state that vacuum degassers are not controlled sources under the standard.

Based upon a review of the preambles in the July 13, 2001 *Federal Register* notice for the proposed standard and the May 20, 2003 *Federal Register* notice for the final standard, US EPA does not specifically state that vacuum degassers are not controlled sources. In fact, the US EPA indicates in the preamble to the proposed standard (66FR36838 through 36839) that vacuum degassing is a type of ladle metallurgy. In the US EPA document, "National Emission Standards for Hazardous Air Pollutants for Integrated Iron and Steel Plants - Background Information for Proposed Standards" (EPA-453/R-01-005, January 2001), US EPA includes emissions data for vacuum degassing in the discussion of ladle metallurgy operations (pages 4-29 and 4-37). While this does not mean that US EPA intended to include vacuum degassers in the definition of ladle metallurgy, it does not clarify that they are not included. ISG Indiana Harbor can seek a determination from the USEPA Region 5 contact for this NESHAP. Since the suggested qualifying statement is not in the rule language or preambles to the proposed or final standards, IDEM will not include the suggested qualifying statement in the permit. IDEM will wait until the litigation is settled, and US EPA clarifies the definition. If, as a result of the litigation, the US EPA revises the definition to specifically exclude vacuum degassing, ISG may apply for a permit modification to include such a statement in the permit. The compliance date is May 22, 2006; therefore, there is time for the litigation to be settled. Until the litigation is settled, ISG may work with their compliance inspector to ensure that interpretation of the rule requirements is consistent between IDEM, US EPA, and ISG.

**Comment 49:**

Section D.3.4 – Particulate Matter
Grain loading limits for non-stack sources such as the BOF Roof Monitor cannot be verified through source testing. The permit should expressly state that ISG may certify compliance with these limits for the BOF Roof Monitor on the basis that it has complied with the particulate matter requirements in D.3.10 or by demonstrating compliance with the existing BOF Roof Monitor MACT standard of 20% opacity (3 minute average) using a Method 9 performance test.

**Response 49:**

See Response 21.

**Comment 50:**

Section D.3.6 – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 50:**

See Response 23.

**Comment 51:**

Section D.3.9 – Testing Requirements
ISG particulate limits listed in the SIP were based on USEPA method 5 front half particulate only. ISG requests that a statement be inserted in this section stating that PM10 testing includes front half particulate only. This is necessary to ensure that future particulate testing will be using the same method that was used when the emission limitations were established.

**Response 51:**

326 IAC 6-1-10.1(f)(1) specifies the methods required to measure emissions of PM10 and should be followed. The following change has been made to Condition D.3.9.

D.3.9 Testing Requirements [326 IAC 2-7-6(1), (6)][326 IAC 2-1.1-11]

Within thirty (30) months of issuance of this permit, or the date of the last valid compliance test or an alternative date as determined by OAQ, Compliance Data Section, the Permittee shall perform PM10 testing on the BOF electrostatic precipitator main stack utilizing a testing method approved by the Commissioner in accordance with Section C - Performance Testing. **PM10 shall be measured by the appropriate method as listed in 326 IAC 6-1-10.1(f)(1).** This test shall be repeated at least once every two and one half (2.5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

**Comment 52:**

Section D.3.11 – Continuous Compliance Plan (CCP)
ISG requests that IDEM not paraphrase the CCP requirements found in 326 IAC 6-1-10.1. We suggest that IDEM replace the existing draft permit language with:
*The plan shall contain the requirements specific for basic oxygen process identified in 326 IAC 6-1-10.1(p)(3)(A).*
*The plan shall contain the operation and maintenance requirements for particulate matter control equipment identified in 326 IAC 6-1-10.1(q).*
*The plan shall contain the recording, inspection, and maintenance procedures for a facility controlled with a scrubber identified in 326 IAC 6-1-10.1(r)(1).*
*The plan shall contain the recording, inspection, and maintenance procedures for a facility controlled with an electrostatic precipitator identified in 326 IAC 6-1-10.1(r)(2).*

**Response 52:**

IDEM OAQ has decided to add a condition into Section C of the Part 70 Permit (see response 27) for the requirements regarding a Continuous Compliance Plan (CCP), subsequently all remaining Section C conditions have been renumbered. In addition Condition D.3.11 has been removed and all subsequent conditions have been renumbered. The recordkeeping requirement for CCP has been removed from D.3.16 (a) (previously D.3.17) and remaining requirements renumbered. The following changes have been made:

~~D.3.11 Continuous Compliance Plan [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through~~

~~(v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCP were submitted to IDEM. The plans include the following:~~

~~(a) Pursuant to 326 IAC 6-1-10.1(p)(3)(A), the plans for the Basic oxygen process (BOP, BOF, QBOP) shall include the following:~~

~~(1) the capture and control devices~~

~~(2) fume suppression system~~

~~(3) procedure for recording furnace charging and tapping time, amount of throughput, and amount of steel produced~~

~~(4) the off-gas system leak detection and repair record keeping practices~~

~~(5) procedures used to minimize dirt and debris accumulation on the facility floor~~

~~(6) practices that reduce $PM_{10}$ and TSP emissions escaping the primary or secondary hood during scrap charging and hot metal charging tapping steel and dumping slag~~

~~(7) the capture system~~

~~(b) Pursuant to 326 IAC 6-1-10.1(q), the plans for the particulate matter control equipment shall include operation and maintenance requirements~~

~~(c) Pursuant to 326 IAC 6-1-10.1(r)(1), the plans for a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures~~

D.3.1~~7~~**6** Record Keeping Requirements

~~(a) To document compliance with D.3.11 the Permittee shall maintain at the source a copy of the Continuous Compliance Plan (CCP) and perform the inspections, monitoring and record keeping requirements in accordance with the Permittee's CCP.~~

**Comment 53:**

Section D.3.13 and D.3.18*(now D.3.12 and D.3.17)*– VE Notations and Record Keeping Requirements Once per shift monitoring is overly burdensome and unnecessary to demonstrate compliance. ISG requests that monitoring start on a daily basis with the opportunity for less frequent monitoring upon demonstrating consistent compliance.

**Response 53:**

See Response 28.

**Comment 54:**

Section D.3.14 – Parametric Monitoring (See comment on D.1.12 above)
The normal differential pressure operating range for the reladle/desulf baghouse is 4.0 to 12.0 inches of water. The normal differential pressure operating range for the LMF baghouse is 4.0 to 9.0 inches of water.

**Response 54:**

Condition D.3.13 (previously D.3.14) has been changed as follows:

D.3.1~~4~~**3** Baghouse Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

The Permittee shall record the total static pressure drop across the baghouse used in conjunction

with the reladle/desulfurization operations (S3B), and the ladle metallurgical facility (LMF) operations (S3C) at least once per shift when the associated processes are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of ~~4.0-10.0~~ **4.0 to 12.0** inches of water or a range established during the latest stack test,**for the reladle/desulfurization operations (S3B) and 4.0 to 9.0** inches of water or a range established during the latest stack test **for the ladle metallurgical facility (LMF) operations (S3C),** the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports. A reading that is outside the ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C-Compliance Response Plan-Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

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

**Comment 55:**

D.3.16 *(now D.3.15)* – Broken or Failed Bag Detection
See comment above on D.1.14(b). Insert the following language to replace subpart (b):

*"For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings or if a bag failure is detected by some other means, and if the failure is causing abnormal visible emissions that may be violating opacity limits, then failed units and any associated process relying on the control device to comply with an applicable emission limitation will be shut down immediately until the failed units have been repaired or replaced. Operations may continue if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit."*

Also, in paragraph (a), the obligation to take response steps should be taken within eight (8) "operating" hours instead of eight (8) "business" hours. Obviously, if the source of emissions is not operating, ISG should not be obligated to expedite its response steps.

**Response 55:**

See Response 31.

**Comment 56:**

D.3.20 *(now D.3.19)* – Requirements to Submit …
Delete this section. *See* Comment for D.1.19 above.

**Response 56:**

See Response 32.

**Comment 57:**

Section D.4.3 – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 57:**

See Response 23.

**Comment 58:**

Section D.4.4 – Continuous Compliance Plan (CCP)

ISG requests that IDEM not paraphrase the CCP requirements found in 326 IAC 6-1-10.1. We suggest that IDEM replace the existing draft permit language with:
*The plan shall contain the requirements specific for the combustion of fuels at the reheat furnaces as identified in 326 IAC 6-1-10.1(p)(4).*

**Response 58:**

IDEM OAQ has decided to add a condition into Section C of the Part 70 Permit (see response 27) for the requirements regarding a Continuous Compliance Plan (CCP), subsequently all remaining Section C conditions have been renumbered. In addition Condition D.4.4 has been removed and all subsequent conditions have been renumbered. The recordkeeping requirement for CCP has been removed from D.4.6(d) (previously D.4.7) and remaining requirements renumbered. The following changes have been made:

~~D.4.4 Continuous Compliance Plan [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCPs were submitted to IDEM. The plans include the following:~~

~~(a) Pursuant to 326 IAC 6-1-10.1(p)(4), the plans for the fuel combustion of fuels at reheat furnaces shall include the following:~~

~~(1) requirements of this subdivision shall not relax the fuel monitoring and reporting requirements of 326 IAC 7-1.1-1 for the sources this section applies to~~

~~(2) maintain records as required by 326 IAC 6-1-10.1(p)(4)(B)~~

~~(3) guidance found in 326 IAC 6-1-10.1(p)(4)(C) may be used to estimate emissions~~

D.4.~~7~~**6** Record Keeping Requirements

~~(d) To document compliance with Condition D.4.4, the Permittee shall maintain at the source a copy of the Continuous Compliance Plan (CCP) and perform the inspections, monitoring and record keeping requirements in accordance with the Permittee's CCP.~~

**Comment 59:**

Section D.4.5 and D.4.7 *(now D.4.4 and D.4.6)* – VE Notations and Record Keeping Requirements
Once per shift monitoring is overly burdensome and unnecessary to demonstrate compliance. ISG requests that monitoring start on a daily basis with the opportunity for less frequent monitoring upon demonstrating consistent compliance.

**Response 59:**

See Response 28.

**Comment 60:**

Section D.5(e)(3) – Facility Description
No. 2 Sheet Mill Pickle Line is not owned or operated by ISG. ISG requests that this description be removed from the permit.

**Response 60:**

See Response 6.

**Comment 61:**

Sections D.5.1, D.5.2, D.5.3, D.5.5, D.5.9, D.5.11, D.5.12, D.5.14, D.5.15 – Pickle Line NESHAP No. 2 Sheet Mill Pickle Line is not owned or operated by ISG along with its associated control device. ISG requests that these sections be removed from the permit, including all references to the Part 63 requirements because the remaining emission sources in the D.5 Facility are not subject to the Steel Pickling MACT (Subpart CCC).

**Response 61:**

Conditions D.5.1, D.5.2, D.5.3, D.5.5, D.5.9, D.5.11, D.5.12, D.5.14 and D.5.15 have been removed or revised as a result of the change of ownership of the No. 2 Sheet Mill Pickle Line. The remaining conditions have been renumbered.

~~D.5.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR 63, Subpart A]~~

~~The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the emission units described in this section except when otherwise specified in 40 CFR 63, Subpart CCC.~~

~~D.5.2 National Emission Standards for Hazardous Air Pollutants for Steel Pickling - HCl Process Facilities and Hydrochloric Acid Regeneration Plants [40 CFR 63, Subpart CCC]~~

~~Pursuant to 40 CFR 63, Subpart CCC, the Pickling Line (S5A) shall comply with the following requirements:~~

~~(a) The Permittee shall not cause or allow to be discharged into the atmosphere from the affected pickling line:~~

~~(1) Any gases that contain HCl in a concentration in excess of 18 ppmv; or~~

~~(2) HCl at a mass emission rate that corresponds to a collection efficiency of less than 97 percent.~~

~~D.5.3 NESHAP Maintenance Requirements [40 CFR 63.1160, Subpart CCC]~~

~~The Permittee shall comply with the operation and maintenance requirements of 40 CFR 63.6(e) (Subpart A, General Provisions) at the Pickling Line (S5A). Additionally, the Permittee shall prepare an operation and maintenance plan for each emission control device to be implemented no later than the compliance date. The plan shall be incorporated by reference into the source's Part 70 Operating Permit. All such plans must be consistent with good maintenance practices and, for a scrubber emission control device, must at a minimum:~~

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

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

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

~~(d) Require an inspection of each scrubber at intervals of no less than 3 months with;~~

~~(1) Cleaning or replacement of any plugged spray nozzles or other liquid delivery devices;~~

~~(2) Repair or replacement of missing, misaligned, or damaged baffles, trays, or other~~

~~internal components;~~

~~(3) Repair or replacement of droplet eliminator elements as needed;~~

~~(4) Repair or replacement of heat exchanger elements used to control the temperature of fluids entering or leaving the scrubber; and~~

~~(5) Adjustment of damper settings for consistency with the required airflow.~~

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

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

~~(g) The Permittee shall maintain a record of each inspection, including each item identified in (d) above, that is signed by the responsible maintenance official and that shows the date of each inspection, the problem identified, a description of the repair, replacement, or other corrective action taken, and the date of the repair, replacement, or other corrective action taken.~~

~~D.5.5 Particulate Matter (PM) [326 IAC 6-1-2]~~

~~Pursuant 326 IAC 6-1-2, the Pickle Line (S5A) shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot of exhaust air.~~

~~D.5.9 Compliance and Enforcement [326 IAC 2-7-6(3)][326 IAC 2-7-15]~~

~~(a) Within thirty (30) days after issuance of this permit, the Permittee shall submit initial notification and notifications of compliance status required by 40 CFR 63.9.~~

~~(b) Pursuant to 40 CFR 63.1157(a)(1), the Permittee shall not cause or allow to be discharged in the atmosphere from the affected hydrochloric acid regeneration plant, any gases that contain HCl in a concentration in excess of 18 ppmv. The IDEM has information that indicates that the Permittee is not in compliance with this applicable requirement. The IDEM OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with 40 CFR 63.1157(b)(1) and a schedule for achieving compliance with such requirements.~~

**~~Compliance Determination Requirements~~**

~~D.5.11 Testing Requirements [40 CFR 63.1161]~~

~~(a) Within twelve(12) months of issuance of this permit, the Permittee shall conduct a performance test for the Pickling Line (S5A) to determine and demonstrate compliance with the applicable emission limitation according to the requirements of 40 CFR 63.7 (Subpart A, General Provisions). This initial performance test shall meet the following minimum requirements:~~

~~(1) Following approval of the site-specific test plan, the Permittee shall conduct a performance test for each process or control device to either measure simultaneously the mass flows of HCl at the inlet and the outlet of the control device or measure the concentration of HCl in gases exiting the process or the emission control device.~~

~~(2) Compliance with the applicable concentration standard or collection efficiency standard shall be determined by the average of three consecutive runs or by the~~

~~average of any three of four consecutive runs. Each run shall be conducted under conditions representative of normal process operations.~~

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

~~(b) During the performance test for each emission control device, the Permittee using a wet scrubber to achieve compliance shall establish site-specific operating parameter values for the minimum scrubber makeup water flow rate and, for scrubbers that operate with recirculation the minimum recirculation water flow rate. During the emission test, each operating parameter must be monitored continuously and recorded with sufficient frequency to establish a representative average value for that parameter, but no less frequently than once every 15 minutes. The Permittee shall determine the operating parameter monitoring values as in the averages of the values recorded during any of the runs for which results are used to establish the emission concentration or collection efficiency per 40 CFR 63.1161(a)(2). A Permittee may conduct multiple performance tests to establish alternative compliant operating parameter values. Also, a Permittee may reestablish compliant operating parameter values as part of any performance test that is conducted subsequent to the initial test or tests.~~

~~(c) Performance tests shall be conducted either annually or according to an alternative schedule approved by IDEM, OAQ, but no less frequently than every two and half (2 .5) years or twice per Part 70 Operating Permit term. If any performance test shows that the HCl emission limitation is being exceeded, the Permittee is in violation of the emission limit.~~

~~(d) Pursuant to 40 CFR 63.1163(d), the Permittee of an affected source shall notify IDEM, OAQ in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, to allow IDEM, OAQ to review and approve the site-specific test plan required under 40 CFR 63.7(c), and, if requested by IDEM, OAQ, to have an observer present during the test.~~

~~(e) The following test methods from Appendix A of 40 CFR 60 shall be used to determine compliance under D.5.2 if required:~~

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

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

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

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

~~(5) Method 26A, "Determination of Hydrogen Halide and Halogen Emissions from Stationary Sources – Isokinetic Method," to determine the HCl mass flows at the inlet and outlet of a control device or the concentration of HCl discharged to the atmosphere. If compliance with a collection efficiency standard is being demonstrated, inlet and outlet measurements shall be performed simultaneously. The minimum sampling time for each run shall be 60 minutes and the minimum sample volume 0.85 dry standard cubic meters (dscm) [30 dry standard cubic feet (dscf)]. The concentration of HCl shall be calculated for each run as follows:~~ $C_{HCL(ppmv)} = 0.659\ C_{HCL(mg/dscm)}$~~, where~~ $C_{(ppmv)}$ ~~is concentration in ppmv and~~ $C_{(mg/dscm)}$

~~is concentration in milligrams per dry standard cubic meter as calculated by the procedure given in Method 26A.~~

~~(6) The Permittee may use equivalent alternative measurement methods approved by U.S. EPA.~~

~~D.5.12 Monitoring Requirements [40 CFR 63.1162]~~

~~(a) The Permittee of a new, reconstructed, or existing steel pickling facility shall:~~

~~(1) The Permittee shall install, operate and maintain systems for the measurement and recording of the scrubber makeup water flow rate and, if required, recirculation water flow rate. These flow rates must be monitored continuously and recorded at least once per shift while the scrubber is operating. Operation of the wet scrubber with excursions of scrubber makeup water flow rate and recirculation water flow rate less than the minimum values established during the performance test or tests will require initiation of corrective action as specified by the maintenance requirements in 40 CFR 63.1160(b)(2).~~

~~(2) Failure to record each of the operating parameters in 40 CFR 63.1162(a)(2) is a violation of the monitoring requirements of 40 CFR 63, Subpart CCC.~~

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

~~(4) The Permittee may develop and implement alternative monitoring requirements subject to approval by IDEM, OAQ.~~

~~D.5.14 Record Keeping Requirements~~

~~(a) To document compliance with Conditions D.5.2 and D.5.3, the Permittee shall maintain the following records pursuant to 40 CFR 63.1165:~~

~~(1) The Permittee, as required by 40 CFR 63.10(b)(2) (Subpart A, General Provisions), shall maintain general records for 5 years from the date of each record of:~~

~~(A) The occurrence and duration of each startup, shutdown, or malfunction of operation;~~

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

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

~~(D) Actions taken during periods of startup, shutdown, and malfunction and the dates of such actions when these actions are different from the procedures specified in the startup, shutdown, and malfunction plan;~~

~~(E) All information necessary to demonstrate conformance with the startup shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. This information can be recorded in a checklist or similar form (see 40 CFR 63.10(b)(2)(v))~~

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

~~(G) All results of initial or subsequent performance tests;~~

~~(H) If the Permittee has been granted a waiver from record keeping or reporting requirements under 40 CFR 63.10(f), any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements;~~

~~(I) If the Permittee has been granted a waiver from the initial performance test under 40 CFR 63.7(h), a copy of the full request and approval or disapproval;~~

~~(J) All documentation supporting initial notifications and notifications of compliance status required by 40 CFR 63.9; and~~

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

~~(2) Records specifically required in 40 CFR 63, Subpart CCC:~~

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

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

~~(C) Each maintenance inspection and repair, replacement, or other corrective action;~~

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

~~(b) Records maintained pursuant to the record keeping requirements of 40 CFR 63, Subpart CCC, shall be maintained on site for a period of 2 years. Records for the 3 previous years may be maintained off site.~~

~~(c) To document compliance with Conditions D.5.6, D.5.8 and D.5.13, the Permittee shall maintain records of natural gas use.~~

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

D.5.~~15~~**7** Reporting Requirements ~~[40 CFR 63.1164]~~

~~(a) As required by 40 CFR 63.10(d)(2), the Permittee of an affected source shall report the results of any performance test as part of the notification of compliance status required in 40 CFR 63.1163.~~

~~(b) The Permittee of an affected source who is required to submit progress reports under 40 CFR 63.6(i), shall submit such reports to IDEM, OAQ by the dates specified in the written extension of compliance.~~

~~(c) The Permittee of an affected source shall operate and maintain each affected emission source, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the standard at all time, including during any period of startup, shutdown, or malfunction. Malfunctions must be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.~~

~~(1) The Permittee shall develop and implement a written startup, shutdown, and malfunction plan that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, or malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the relevant standard.~~

~~(2) If actions taken by an Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the startup, shutdown, and malfunction plan, the Permittee shall state such information in a semiannual report. The report, to be certified by the Permittee or other responsible official, shall be submitted semiannually and delivered or postmarked by the 30th day following the end of each calendar half; and~~

~~(3) Any time an action taken by an Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall comply with all requirements of 40 CFR 63.10(d)(5)(ii).~~

~~(d~~**a**~~)~~ A quarterly summary of the information to document compliance with Condition D.5.~~8~~**4** and ~~D.5.14 (c)~~ shall be submitted to the address listed in Section C – General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. **The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

~~(e~~**b**) Reports shall be submitted in accordance with Section C - General Reporting Requirements of this permit.

**Comment 62:**

Section D.5.10 *(now D.5.5)* – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 62:**

See Response 23.

**Comment 63:**

Section D.6.6 – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 63:**

See Response 23.

**Comment 64:**

Section D.7.5 – Preventative Maintenance Plan
Revise per comment on D.1.6 above.

**Response 64:**

See Response 23.

**Comment 65:**

Section D.7.7 – Continuous Compliance Plan (CCP)
ISG requests that IDEM not paraphrase the CCP requirements found in 326 IAC 6-1-10.1. We suggest that IDEM replace the existing draft permit language with:
*The plan shall contain the requirements specific for the combustion of fuels at the boilers as identified in 326 IAC 6-1-10.1(p)(4).*

**Response 65:**

IDEM OAQ has decided to add a condition into Section C of the Part 70 Permit (see response 27) for the requirements regarding a Continuous Compliance Plan (CCP), subsequently all remaining Section C conditions have been renumbered. In addition Condition D.7.7 has been removed and all subsequent conditions have been renumbered. The recordkeeping requirement for CCP has been removed from D.7.8 (b) (previously condition D.7.9) and remaining requirements renumbered. The following changes have been made:

~~D.7.7 Continuous Compliance Plan [326 IAC 6-1-10.1]~~

~~Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1(l) through (v), the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP. CCP were submitted to IDEM. The plans include the following:~~

~~(a) Pursuant to 326 IAC 6-1-10.1(p)(4), the plans for the Fuel combustion boilers shall include the following:~~

~~(1) requirements of this subdivision shall not relax the fuel monitoring and reporting requirements of 326 IAC 7-1.1-1 for the sources this section applies to~~

~~(2) maintain records as required by 326 IAC 6-1-10.1(p)(4)(B)~~

~~(3) guidance found in 326 IAC 6-1-10.1(p)(4)(C) may be used to estimate emissions~~

D.7.~~9~~**8** Record Keeping Requirements

~~(b) To document compliance with Condition D.7.7, the Permittee shall maintain at the source a copy of the Continuous Compliance Plan (CCP) and perform the inspections, monitoring and record keeping requirements in accordance with the Permittee's CCP.~~

**Comment 66:**

Section D.8(h)(11)(B) – Facility Description
Change description to *"Two (2) Diesel Fuel Storage Tanks (T-4A7 & T-4A8) each with a 10,000 gallon storage capacity."*

**Response 66:**

See Response 6.

**Comment 67:**

Condition D.8.3 has been revised as follows:

Section D.8.3 – Volatile Organic Liquid Storage Vessels
Change the description of the diesel tank from one 25,000 gallon tank to *"two (2) 10,000 gallon Diesel Fuel Storage Tanks (T-4A7 & T-4A8)."*

**Response 67:**

D.8.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for the ~~25,000 gallon~~ **two (2) 10,000 gallon** Diesel Fuel Storage Tank (~~T4A13~~ **T-4A7 & T-4A8**).

**Comment 68:**

Section D.9(i) – Facility Description
(i)(2) – change description *#2* fuel oil to *#6* fuel oil.
(i)(12) – add tank, (12) One (1) 8,000 gallon diesel fuel tank (T-4F95).

**Response 68:**

See Response 6.

**Comment 69:**

Section D.10 – Insignificant Activities
The draft permit does not contain a description of all insignificant activities listed in the permit application. A complete list of insignificant activities can be found in the Title V Permit Application.

**Response 69:**

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAQ ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. During the development of Title V Operating Permit and the subsequent implementation of the program, this approach has been the consensus recommendation of both the regulated community and the OAQ. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. It was felt that there would be less confusion if the permit did not give the impression that the rules required every insignificant activity to be listed in the permit. Therefore, there is no change made on the permit as a result of this comment.

**Comment 70:**

Section D.10.1 Nonattainment Area Particulate Limitations
The permit should anticipate the redesignation of this area as attainment for the National Ambient Air Quality Standard for particulate matter. As such, the following should be added to this permit term, "Changes to this rule requirement resulting from the redesignation of Lake County as an attainment area for particulate matter will be incorporated by reference into this permit

administratively without reopening the permit."

**Response 70:**

The provisions were not affected by Indiana's adoption of the federal attainment designation for PM-10. Rules that were developed to attain an air quality standard remain in place in order to maintain that standard. While any rule may change and be subsequently approved by the U.S. EPA as part of the State Implementation Plan, no action has been taken to revise this rule.

On December 31, 2003, IDEM adopted a revision to 326 IAC 1-4-1 redesignating Lake County as attainment for PM10. The Part 70 Permit reflects 326 IAC 6-1 as applicable at the time of permit issuance. IDEM OAQ cannot incorporate future determinations before they are finalized. If there are future changes to the rule, the Permittee can submit a request to IDEM to revise the permit accordingly. No changes have been as a result of this comment.

**Comment 71:**

Section D.10.2 – Volatile Organic Liquid Storage Vessels
Change "all storage vessels" to "all stationary vessels used to store volatile organic liquids"

**Response 71:**

IDEM agrees to change Condition D.10.2. 326 IAC 8-9-1 only applies to vessels that store volatile organic liquid.

D.10.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all ~~storage vessels~~ **stationary vessels used to store volatile organic liquids**.

ISG International Steel Group
Indiana Harbor, Inc.
3001 Dickey Road, East Chicago, Indiana 46312-1610

October 8, 2003

*Certified Mail 7001 0320 0003 8302 1219*

**Indiana Department of Environmental Management**
Office of Air Quality
Compliance Data Section
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Re: Sinter Plant VOC Rule
High Ozone Day Action Plan Revision
Per 326 IAC 8-13-4 (b) (8) (B)

To Whom It May Concern:

ISG Indiana Harbor Inc. (ISG) will continue to implement the VOC Control Plan submitted by the former LTV Steel Company approved by IDEM on 9/7/99. To avoid confusion with the prediction of High Ozone Days, ISG requests to revise the High Ozone Day Action Plan to rely on the IDEM forecast (option 1, Nonrule Policy Document Air-20-NPD dated November 12, 1998) as opposed to ISG's current approved method of using Murry & Trettle, Inc. weather forecasting service (option 2). ISG is a member of the "Partners for Clean Air Program" and currently receives an ozone day notification via fax when an Ozone Action Day has been called for the following day.

Should you have any questions or need additional information, please call at (219) 391-2330.

Alan H. Cross
Environmental Engineer
ISG Indiana Harbor Inc.