



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: June 30, 2006
RE: Levy Company, Inc. / 127-7656-00026
FROM: Nisha Sizemore
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
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

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

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

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

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



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**The Levy Company, Inc.-
a contractor of ISG Burns Harbor, LLC
U.S. Highway 12
Burns Harbor, Indiana 46304**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T127-7656-00026	
Original signed by: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 30, 2006 Expiration Date: June 30, 2011

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Part 70 Source Definition [326 IAC 2-7-1(22)]	
A.3	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.4	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	7
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
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]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	16
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	
C.10	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
C.11	Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]	
C.12	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]	

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

Stratospheric Ozone Protection

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS 22

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

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

Compliance Determination Requirements

- D.1.2 Particulate Matter [326 IAC 2-7-6(6)]

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

- D.1.3 Visible Emissions Notations

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

- D.1.4 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS 24

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

- D.2.1 Particulate [326 IAC 6-3-2]
- D.2.2 PSD Minor Limit [326 IAC 2-2]
- D.2.3 Opacity [326 IAC 5-1]
- D.2.4 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Compliance Determination Requirements

- D.2.5 Particulate Matter [326 IAC 2-7-6(6)]
- D.2.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

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

- D.2.7 Visible Emissions Notations

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

- D.2.8 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS- Insignificant Activities 27

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

- D.3.1 Insignificant Activities [326 IAC 2-7-1(21)]
- D.3.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]
- D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3]
- D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3]

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

- D.3.5 Record Keeping Requirements

Certification 30

Emergency Occurrence Report 31

Quarterly Deviation and Compliance Monitoring Report 33

SECTION A

SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1, A.2, 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 approval 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)]

The Permittee owns and operates a blast furnace and basic oxygen furnace slag finishing operation and separation plant.

Responsible Official: Plant Manager
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304
Mailing Address: P.O. Box 540, Portage, Indiana 46368
General Source Phone Number: (219)787-9583
SIC Code: 3295
County Location: Porter
Source Location Status: Nonattainment for PM 2.5
Nonattainment for 1 hour and 8 hour ozone standards
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source under PSD and Emission Offset Rules
Major Source, Section 112 of the Clean Air Act
1 of 28 Listed Source Categories

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

The Levy Company, Inc., operates this slag finishing operation and separation plant, and is a contractor of ISG Burns Harbor, LLC:

- (a) ISG Burns Harbor, LLC (plant ID 127-00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (b) The Levy Company (plant ID 127-00026), the secondary operation, is located at U.S. Highway 12, Burns Harbor, Indiana.

Separate Part 70 permits will be issued to ISG Burns Harbor, LLC (TV 127-6301-00001) and The Levy Company (TV 127-7656-00026) solely for administrative purposes.

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

The Levy Company, Inc. operates the following emission units and pollution control devices:

Burns Harbor Site

- (a) An open air Slag Pot Dumping operation constructed in 1969 which receives slag pots by pot carrier from the BOF, identified as EU001-01, with collective fugitive emissions EP001-9011.
- (b) An open air Slag Pot Preparation operation constructed in 1969, identified as EU001-04, consisting of relining and conditioning of empty pots, with pot material additive, with collective fugitive emissions EP001-9001.
- (c) An open air Blast Furnace and BOF Slag Batch Unloading/Processing/Loading operation (Separation Plant) constructed in 1969, identified as EU001-02, with a maximum capacity of 1,150 tons of material per hour, with PM controlled by water sprays, and collective fugitive emissions EP001-9002, consisting of the following equipment:
 - (1) One (1) grizzly and feed hopper with a maximum capacity of 350 tons per hour.
 - (2) One (1) No. 101 feeder with a maximum capacity of 1,150 tons per hour.
 - (3) One (1) No. 102 belt feeder with a maximum capacity of 1,000 tons per hour.
 - (4) One (1) No. 103 72" drum magnet.

- (5) One (1) No. 103-A swinging pendulum magnet.
 - (6) One (1) No. 104 main conveyor with a maximum capacity of 1,260 tons per hour.
 - (7) One (1) 42" mag head pulley.
 - (8) One (1) Nos. 105 and 106 screens with a maximum capacity of 630 tons per hour each.
 - (9) One (1) No. 107 conveyor with a maximum capacity of 550 tons per hour.
 - (10) One (1) No. 109 radial stacker with a maximum capacity of 550 tons per hour.
 - (11) One (1) 30" mag head pulley.
 - (12) One (1) No. 107-A conveyor with a maximum capacity of 550 tons per hour.
 - (13) One (1) No. 110 radial stacker with a maximum capacity of 550 tons per hour.
 - (14) One (1) 24" mag head pulley.
 - (15) One (1) No. 111 crusher with a maximum capacity of 700 tons per hour.
 - (16) One (1) No. 108 conveyor with a maximum capacity of 300 tons per hour.
 - (17) One (1) No. 139 conveyor with a maximum capacity of 210 tons per hour.
 - (18) One (1) No. 140 conveyor with a maximum capacity of 550 tons per hour.
 - (19) One (1) No. 141 secondary crusher with a maximum capacity of 25 tons per hour.
 - (20) One (1) No. 142 recirculatory conveyor with a maximum capacity of 250 tons per hour.
 - (21) One (1) No. 143 conveyor with a maximum capacity of 225 tons per hour.
 - (22) One (1) No. 144 secondary crusher with a maximum capacity of 225 tons per hour.
 - (23) One (1) No. 145 recirculatory conveyor with a maximum capacity of 225 tons per hour.
 - (24) One (1) No. 112 recirculatory conveyor with a maximum capacity of 410 tons per hour.
 - (25) One (1) overband magnet.
 - (26) One (1) 30" mag head pulley.
 - (27) One (1) No. 114 recirculatory FE conveyor with a maximum capacity of 500 tons per hour.
 - (28) One (1) No. 121 recirculatory FE conveyor with a maximum capacity of 50 tons per hour.
 - (29) One (1) No. 120 conveyor with a maximum capacity of 110 tons per hour.
 - (30) One (1) No. 120F conveyor with a maximum capacity of 10 tons per hour.
 - (31) One (1) No. 120A screen with a maximum capacity of 110 tons per hour.
 - (32) One (1) No. 120B conveyor with a maximum capacity of 120 tons per hour.
 - (33) One (1) 42" mag head pulley.
 - (34) One (1) No. 120E conveyor with a maximum capacity of 10 tons per hour.
 - (35) One (1) No. 120C screen with a maximum capacity of 110 tons per hour.
 - (36) Two (2) truck loading bins.
 - (37) One (1) No. L-7 conveyor with a maximum capacity of 35 tons per hour.
 - (38) One (1) 24" mag head pulley.
- (d) An open air Slag Processing operation (CM-13 Plant) constructed in 1969, identified as EU001-03, with a maximum capacity of 70 tons of slag per hour, and collective fugitive emissions EP001-9003, consisting of:
- (1) One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;
 - (2) One (1) open conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression;
 - (3) Two (2) 4.25 cone crushers, with a maximum capacity of 700 tons of material per hour, with PM controlled by wet suppression; and
 - (4) One (1) open fines conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression.
- (e) An open air Blast Furnace and BOF Slag Finishing Plant constructed in 2003, identified as EU001-05, with a maximum capacity of 250 tons of material per hour, with particulate fugitive emissions controlled by wet suppression, consisting of the following pieces of equipment:
- (1) Two Syntron Feeders (F1 and F2), with a capacity of 250 tons per hour each;
 - (2) One 36 inch by 95 foot conveyor (B), with a capacity of 250 tons per hour;
 - (3) One 30 inch conveyor (A1), with a capacity of 250 tons per hour;
 - (4) One 6 foot by 16 foot D.D. Screen, with a capacity of 250 tons per hour;
 - (5) One 30 inch by 150 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
 - (6) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
 - (7) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
 - (8) One 8 foot by 20 foot TD Screen (SC2), with a capacity of 250 tons per hour;
 - (9) One 60 inch conveyor (F), with a capacity of 110 tons per hour;

- (10) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
- (11) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
- (12) One 5 foot by 12 foot horizontal screen (SC3), with a capacity of 50 tons per hour;
- (13) One 36 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
- (14) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
- (15) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
- (16) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
- (17) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
- (18) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
- (19) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;
- (20) One barge hopper (BH-1);
- (21) One barge stacker (BS-1); and

Four additional conveyors constructed in 2004;

- (22) One 24 inch by 65 foot conveyor (T1), with a capacity of 110 tons per hour;
- (23) One 24 inch by 65 foot conveyor (T2), with a capacity of 200 tons per hour;
- (24) One 30 inch by 30 foot conveyor (T3), with a capacity of 48 tons per hour; and
- (25) One 30 inch conveyor (A2), with a capacity of 250 tons per hour.

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 Levy Company, Inc., also consists of the following insignificant activities that are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 month, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Stock piles with particulate emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)].
- (d) Activities with emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)]:
 - (1) 17,000 gallon diesel AST identified as EE001-9011 [326 IAC 8-9];
 - (2) 11,000 gallon diesel AST identified as EE001-9012 [326 IAC 8-9];
 - (3) Iron breakup processing identified as EE001-9014; and
 - (4) Portable crushing and screening operation identified as EU001-9015.

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] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T127-7656-00026, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-7-7]

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

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

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

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

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

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

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

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

- (a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:

- (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
Indianapolis, Indiana 46204-2251

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

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

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 the 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: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

and for the Northwest Regional Office;

Telephone Number: 1-888-209-8892 (ask for Office of Air Quality, Compliance Section)
Telephone Number: 219-757-0265 (ask for Air Compliance Section)
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
Indianapolis, Indiana 46204-2251

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

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

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

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

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

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

of the U.S. EPA under Section 303 of the Clean Air Act;

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

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

- (a) All terms and conditions of permits established prior to T127-7656-00026 and issued pursuant to permitting programs approved into the state implementation plan have been:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

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

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

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

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

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

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

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

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. In the event that the source is a sub-contractor and is combined with a larger Part 70 source, the larger Part 70 source may pay the Permittees' annual fees as part of the larger source billing and subject to the fee cap of the larger source. If, however, the larger Part 70 does not pay its annual Part permit fee, IDEM, OAQ will assess a separate fee in accordance with 326 IAC 2-7-19(c) to be paid by the Permittee. 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.

The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

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

C.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

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

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

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

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality

100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

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

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

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. 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
Indianapolis, Indiana 46204-2251

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

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

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

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

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

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

C.13 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
Indianapolis, Indiana 46204-2251

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

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

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

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

- (2) review of operation and maintenance procedures and records;
- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (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 purpose of fee assessment.

The statement must be submitted to:

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

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

- (a) Records of all required monitoring data, reports and support information required by this permit shall be

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

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
 - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

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

- (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
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification

by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
 - (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

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

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with 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)]: **Burns Harbor Site**

- (a) An open air Slag Pot Dumping operation constructed in 1969 which receives slag pots by front end loader from the BOF, identified as EU001-01, with a maximum of 5 slag pots per hour, with collective fugitive emissions EP001-9011.
- (b) An open air Slag Pot Preparation operation constructed in 1969, identified as EU001-04, consisting of relining and conditioning of empty pots, with pot material additive, with collective fugitive emissions EP001-9001.
- (c) An open air Blast Furnace and BOF Slag Batch Unloading/Processing/Loading operation (Separation Plant) constructed in 1969, identified as EU001-02, with a maximum capacity of 1,150 tons of material per hour, with PM controlled by water sprays, and collective fugitive emissions EP001-9002, consisting of the following equipment:
 - (1) One (1) grizzly and feed hopper with a maximum capacity of 350 tons per hour.
 - (2) One (1) No. 101 feeder with a maximum capacity of 1,150 tons per hour.
 - (3) One (1) No. 102 belt feeder with a maximum capacity of 1,000 tons per hour.
 - (4) One (1) No. 103 72" drum magnet.
 - (5) One (1) No. 103-A swinging pendulum magnet.
 - (6) One (1) No. 104 main conveyor with a maximum capacity of 1,260 tons per hour.
 - (7) One (1) 42" mag head pulley.
 - (8) One (1) Nos. 105 and 106 screens with a maximum capacity of 630 tons per hour each.
 - (9) One (1) No. 107 conveyor with a maximum capacity of 550 tons per hour.
 - (10) One (1) No. 109 radial stacker with a maximum capacity of 550 tons per hour.
 - (11) One (1) 30" mag head pulley.
 - (12) One (1) No. 107-A conveyor with a maximum capacity of 550 tons per hour.
 - (13) One (1) No. 110 radial stacker with a maximum capacity of 550 tons per hour.
 - (14) One (1) 24" mag head pulley.
 - (15) One (1) No. 111 crusher with a maximum capacity of 700 tons per hour.
 - (16) One (1) No. 108 conveyor with a maximum capacity of 300 tons per hour.
 - (17) One (1) No. 139 conveyor with a maximum capacity of 210 tons per hour.
 - (18) One (1) No. 140 conveyor with a maximum capacity of 550 tons per hour.
 - (19) One (1) No. 141 secondary crusher with a maximum capacity of 25 tons per hour.
 - (20) One (1) No. 142 recirculatory conveyor with a maximum capacity of 250 tons per hour.
 - (21) One (1) No. 143 conveyor with a maximum capacity of 225 tons per hour.
 - (22) One (1) No. 144 secondary crusher with a maximum capacity of 225 tons per hour.
 - (23) One (1) No. 145 recirculatory conveyor with a maximum capacity of 225 tons per hour.
 - (24) One (1) No. 112 recirculatory conveyor with a maximum capacity of 410 tons per hour.
 - (25) One (1) overband magnet.
 - (26) One (1) 30" mag head pulley.
 - (27) One (1) No. 114 recirculatory FE conveyor with a maximum capacity of 500 tons per hour.
 - (28) One (1) No. 121 recirculatory FE conveyor with a maximum capacity of 50 tons per hour.
 - (29) One (1) No. 120 conveyor with a maximum capacity of 110 tons per hour.
 - (30) One (1) No. 120F conveyor with a maximum capacity of 10 tons per hour.
 - (31) One (1) No. 120A screen with a maximum capacity of 110 tons per hour.
 - (32) One (1) No. 120B conveyor with a maximum capacity of 120 tons per hour.
 - (33) One (1) 42" mag head pulley.
 - (34) One (1) No. 120E conveyor with a maximum capacity of 10 tons per hour.
 - (35) One (1) No. 120C screen with a maximum capacity of 110 tons per hour.
 - (36) Two (2) truck loading bins.
 - (37) One (1) No. L-7 conveyor with a maximum capacity of 35 tons per hour.
 - (38) One (1) 24" mag head pulley.
- (d) An open air Slag Processing operation (CM-13 Plant) constructed in 1969, identified as EU001-03, with a maximum capacity of 70 tons of slag per hour, and collective fugitive emissions EP001-9003, consisting of:
 - (1) One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;
 - (2) One (1) open conveyor, with a maximum capacity of 1260 tons of material per hour, with PM controlled by wet suppression;
 - (3) Two (2) 4.25 cone crushers, with a maximum capacity of 700 tons of material per hour, with PM controlled by wet suppression;
 - (4) One (1) open fines conveyor, with a maximum capacity of 1260 tons of material per hour, with PM controlled by wet suppression.

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

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

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Separation Plant (EU001-02) and the CM-13 Plant (EU001-03) shall not exceed 79.4 and 47.8 pounds per hour when the Separation Plant is operating at a capacity of 1,150 tons of material per hour, and when the CM-13 Plant is operating at a capacity of 70 tons of slag per hour, respectively. The pounds per hour limitation was calculated with the following equation:

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

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

Compliance Determination Requirements

D.1.2 Particulate Matter [326 IAC 2-7-6(6)]

The Permittee shall use wet suppression to control emissions of PM and PM-10 from the conveyors, screens, feeders, hoppers, crushers and stackers at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 6-3. If weather conditions preclude the use of wet suppression, the Permittee shall perform chemical analysis on the slag material to ensure it has a moisture content greater than 2.0 percent.

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

D.1.3 Visible Emissions Notations

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

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with condition D.1.2, the Permittee shall maintain records of the chemical analysis of the slag material, as needed, to demonstrate compliance during times the wet suppression is not used due to weather.
- (b) To document compliance with condition D.1.3, the Permittee shall maintain records of visible emission notations of the process emission points.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: **Burns Harbor Site**

(e) An open air Blast Furnace and BOF Slag Finishing Plant constructed in 2003, identified as EU001-05, with a maximum capacity of 250 tons of material per hour, with particulate fugitive emissions controlled by wet suppression, consisting of the following pieces of equipment:

- (1) Two Syntron Feeders (F1 and F2), with a capacity of 250 tons per hour each;
- (2) One 30 inch by 95 foot conveyor (B), with a capacity of 250 tons per hour;
- (3) One 30 inch conveyor (A1), with a capacity of 250 tons per hour;
- (4) One 6 foot by 16 foot D.D Screen, with a capacity of 250 tons per hour;
- (5) One 30 inch by 150 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
- (6) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
- (7) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
- (8) One 8 foot by 20 foot TD Screen (SC2), with a capacity of 250 tons per hour;
- (9) One 60 inch conveyor (F), with a capacity of 110 tons per hour;
- (10) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
- (11) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
- (12) One 5 foot by 12 foot horizontal screen (SC3), with a capacity of 50 tons per hour;
- (13) One 36 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
- (14) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
- (15) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
- (16) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
- (17) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
- (18) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
- (19) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;
- (20) One barge hopper (BH-1);
- (21) One barge stacker (BS-1); and

Four additional conveyors constructed in 2004;

- (22) One 24 inch by 65 foot conveyor (T1), with a capacity of 110 tons per hour;
- (23) One 24 inch by 65 foot conveyor (T2), with a capacity of 200 tons per hour;
- (24) One 30 inch by 30 foot conveyor (T3), with a capacity of 48 tons per hour; and
- (25) One 30 inch conveyor (A2), with a capacity of 250 tons per hour.

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

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

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the Finishing Plant (EU001-05) shall not exceed 60.9 pounds per hour when operating at a process weight rate of 500,000 pounds per hour (250 tons per hour). The pounds per hour limitation was calculated with the following equation:

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

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

D.2.2 PSD Minor Limit [326 IAC 2-2]

Pursuant to Significant Source Modification 127-15319-00026, issued May 30, 2002, Minor Source Modification 127-19102-00026, issued July 23, 2004, and 326 IAC 2-2 (Prevention of Significant Deterioration), the PM and PM-10 emission rates from the Finishing Plant (EU001-05) emission units shall not exceed the values indicated below:

Process	Emission Limit (lb/ton)		Process	Emission Limit (lb/ton)	
	PM	PM10		PM	PM10
Two Syntron Feeders	0.0001008	0.000048	Radial Stacker S5	0.0001008	0.000048
Conveyor B	0.0001008	0.000048	Conveyor I	0.0001008	0.000048
Conveyor A1	0.0001008	0.000048	Radial Stacker S3	0.0001008	0.000048
D.D. Screen	0.0017640	0.000840	Conveyor J	0.0001008	0.000048
Stacker Conveyor C	0.0001008	0.000048	Conveyor K	0.0001008	0.000048
Conveyor D	0.0001008	0.000048	Radial Stacker S2	0.0001008	0.000048
Conveyor E	0.0001008	0.000048	Barge Hopper BH-1	0.0001008	0.000048
TD Screen	0.0017640	0.000840	Barge Stacker BS-1	0.0001008	0.000048
Conveyor F	0.0001008	0.000048	Conveyor A2	0.0001008	0.000048
Conveyor G	0.0001008	0.000048	Conveyor T1	0.0001008	0.000048
Conveyor H	0.0001008	0.000048	Conveyor T2	0.0001008	0.000048
SD Horizontal Screen	0.0017640	0.000840	Conveyor T3	0.0001008	0.000048
Radial Stacker S4	0.0001008	0.000048			

These limits will limit emissions to less than 15 tons per year of PM and PM-10 from the Finishing Plant. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply to this modification.

D.2.3 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

D.2.4 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan required by this rule.

Compliance Determination Requirements

D.2.5 Particulate Matter [326 IAC 2-7-6(6)]

Pursuant to Significant Source Modification 127-15319-00026, issued May 30, 2002, and Minor Source Modification 127-19102-00026, issued July 23, 2004, the Permittee shall use wet suppression to control emissions of PM and PM₁₀ from the conveyors, screens, feeders, hoppers, and stackers at all times these emission units are in operation. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 6-3 and 326 IAC 2-2. If weather conditions preclude the use of wet suppression, the Permittee shall perform chemical analysis on the slag material to ensure its moisture content is greater than 2.0 percent.

D.2.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled by wet suppressant on an as-needed basis.

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

D.2.7 Visible Emissions Notations

- (a) Visible emission notations of all process emission points shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down

time.

- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.2.8 Record Keeping Requirements

- (a) To document compliance with condition D.2.5, the Permittee shall maintain records of the chemical analysis of the slag material, as needed, to demonstrate compliance during times the wet suppression is not used due to weather.
- (b) To document compliance with condition D.2.7, the Permittee shall maintain records of visible emission notations of the process emission points.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 month, except if subject to 326 IAC 20-6. [326 IAC 8-3]
- (b) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6-3-2]
- (c) Stock piles with particulate emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)].
- (d) Activities with emissions equal to or less than insignificant thresholds [326 IAC 2-7-1(21)]:
 - (1) 17,000 gallon diesel AST identified as EE001-9011 [326 IAC 8-9];
 - (2) 11,000 gallon diesel AST identified as EE001-9012 [326 IAC 8-9];
 - (3) Iron breakup processing identified as EE001-9014; and
 - (4) Portable crushing and screening operation identified as EU001-9015.

(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 Insignificant Activities [326 IAC 2-7-1(21)]

The emissions from activities EE001-9011, EE001-9012, EE001-9014, and EE001-9015 shall remain below the thresholds listed below to be considered as insignificant:

Lead (Pb)= 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO)= 25lbs/day
Sulfur Dioxide (SO ₂)= 5 lbs/hr or 25 lbs/day	Particulate Matter (PM)= 5 lbs/hr or 25 lbs/day
Nitrogen Oxides (NO _x)= 5 lbs/hr or 25 lbs/day	Volatile Organic Compounds (VOC)= 3 lbs/hr or 15 lbs/day

D.3.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1(b), stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons (EE001-9011 and 9012) are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3]

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, 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°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:

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

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 8-3]

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 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).
- (b) 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).
- (c) 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.

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

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.2, and 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.

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

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: The Levy Company, Inc.
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304
Mailing Address: P.O. Box 540, Portage, Indiana 46368
Part 70 Permit No.: T127-7656-00026

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

Please check what document is being certified:

- 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:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: The Levy Company, Inc.
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304
Mailing Address: P.O. Box 540, Portage, Indiana 46368
Part 70 Permit No.: T127-7656-00026

This form consists of 2 pages

Page 1 of 2

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
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: _____

Attach a signed certification to complete 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: The Levy Company, Inc.
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304
Mailing Address: P.O. Box 540, Portage, Indiana 46368
Part 70 Permit No.: T127-7656-00026

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

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

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: The Levy Company, Incorporated- a contractor of ISG Burns Harbor, LLC
Source Location: U.S. Highway 12, Burns Harbor, Indiana 46304
County: Porter
SIC Code: 3312
Operation Permit No.: T127-7656-00026
Permit Reviewer: Melissa Groch

On February 10, 2006, the Office of Air Quality (OAQ) had a notice published in the Vidette Times, Valparaiso, Indiana, stating that The Levy Company, Inc., had applied for a Part 70 Operating Permit to operate a blast furnace and basic oxygen furnace slag finishing operation and separation plant operation. 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.

Written comments were received during this comment period from the Permittee. IDEM has addressed each one of these written comments in this document. In some instances, permit language has been added or deleted as a result of the comments. Added language is shown in bold font and language with strikethrough font has been deleted.

Additionally, on March 27, 2006, Calumite Company, LLC, submitted comments and application forms regarding their new ownership of the calumite plant (section D.4 of the draft Part 70 operating permit). Each of their comments addressed only the calumite facility, and changes they wished to make thereof. This section is being removed from the Levy Company permit. Because the initial Federally Enforceable State Operating Permit (FESOP) for the calumite plant remains in force, the Calumite Company is first required to transition from the FESOP program into the Part 70 program.

Regarding the Technical Support Document (TSD), IDEM OAQ prefers that this document remain as it was during public notice. No changes have been made to the TSD as a result of this Addendum to the Technical Support Document (or ATSD).

On March 27, 2006, Susan Grenzebach of OCS Environmental, Inc., submitted the following written comments on behalf of The Levy Co., Inc.:

Comment 1: Correction to the cover page. The zip code for Burns Harbor, Indiana is 46304.

Response 1: This correction has been made to the cover page and to the corresponding address in condition A.1.

Comment 2: We have provided corrections to the phone number and address. 900 George Nelson Drive is the location of the Calumite Company's calumite plant. Levy transferred ownership of this facility in October of 2005 and no longer owns or operates the facility. We request all references to the Calumite Plant be removed from the Levy permit.

Response 2: The D Section that contains the calumite facility, D.4, has been removed from the Part 70 operating permit. Prior to being included in this permit, the calumite facility was operating under a FESOP. Originally, the FESOP was to remain in force until issuance of the Part 70 operating permit for Levy Co. Because the final issued Part 70 operating permit for Levy Co. will not include this facility, as it is now owned by Calumite Company, LLC, the FESOP continues to be the current operating permit for the calumite facility until a transition into the Part 70 operating permit program takes place.

Additionally, the associated conditions in the Table of Contents, the descriptions in A.3(f), and the references to the Port of Indiana site in A.1, A.2, A.3, A.4 and D.4 have also been removed.

Comment 3: Levy transferred ownership of this facility in October of 2005 to Calumite Company, LLC and no longer owns or operates the facility. We request all references to the Calumite Plant be removed from the Levy permit and that a separate operating permit be issued to Calumite Company, LLC for the Calumite Plant at the Port of Indiana.

Response 3: Please see Response 2 concerning this matter.

Comment 4: [Condition A.3] Item (a) suggests there is a capacity of processing 5 slag pots per hour at the facility. We request that this statement be removed. Several slag pots may be staged inside the shop before being moved to the processing area and it is possible to have more than 5 pots moving into the processing area at any given time.

Item (b) contains errors in the description of the slag pot preparation process. Water is not used because of safety reasons. Additionally, blast furnace burden and limestone slurry are not part of this process.

[Item (c)]: We have provided corrections to the equipment listing in item (c). The overall throughput remains unchanged at 1,100 tph and the corrections to the individual equipment within the unit does not change emission levels. The overall throughput of this unit is controlled and limited by the feeder capacity of 1,100 tph. We feel that the listing of stockpiles is not appropriate for this type of operation and stockpile locations and quantities change frequently. We feel it is more appropriate to include stockpiles in the insignificant activities section of the permit as is commonly done in other aggregate operation permits.

[Item (d)]: We have provided corrections to the equipment listing in item (d). The overall throughput remains unchanged at 350 tph and the corrections to the individual equipment within the unit does not change emission levels. The overall throughput of this unit is controlled and limited by the feeder capacity of 350 tph which remains unchanged. We feel that the listing of stockpiles is not appropriate for this type of operation and stockpile locations and quantities change frequently. We feel it is more appropriate to include stockpiles in the insignificant activities section of the permit as is commonly done in other aggregate operation permits. We also feel it is inappropriate to list mobile equipment (front end loader) in the facility description boxes. It is not commonly done in other facility permits. The front end loader is not exclusive to this operating unit.

[Item (e)]: We have provided corrections to the equipment listing and overall throughput in item (e). The overall throughput is actually 350 tph versus 250 tph. Corrections provided to individual equipment pieces within the unit do not increase the overall throughput beyond 350 tph. Levy provided supporting emission calculations which are included in the TSD (Appendix A, page 2) to support the correction from 250 tph to 350 tph which does not trigger offsets or PSD.

Response 4: In A.3(a), the following has been deleted as requested:

An open air Slag Pot Dumping operation constructed in 1969 which receives slag pots by ~~front end loader~~ **pot carrier** from the BOF, identified as EU001-01, ~~with a maximum of 5 slag pots per hour,~~ with collective fugitive emissions EP001-9011.

In A.3(b), the following changes have been made as requested:

An open air Slag Pot Preparation operation constructed in 1969, identified as EU001-04, consisting of relining and conditioning of empty pots ~~(Pot Material Addition) with a limestone slurry, blast furnace slag burden, and water for return to the BOF,~~ **with pot material additive**, with collective fugitive emissions EP001-9001.

A.3(c) has the following deletions and additions which do not affect the overall maximum throughput:

- (1) ~~One (1) blast furnace slag surge pit;~~ **One (1) grizzly and feed hopper with a maximum capacity of 350 tons per hour.**
- (2) ~~One (1) BOF slag surge pit cooled by a water canon;~~ **One (1) No. 101 feeder with a maximum capacity of 1,150 tons per hour.**
- (3) ~~One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;~~ **One (1) No. 102 belt feeder with a maximum capacity of 1,000 tons per hour.**
- (4) ~~One (1) sizing mill with three (3) vibrating screens, with maximum capacities of 630 tons of material per hour each, and PM controlled by wet suppression;~~ **One (1) No. 103 72" drum magnet.**
- (5) ~~Twelve (12) open conveyors, and two (2) stackers, with maximum capacities of 1,260 tons of material per hour each, with PM controlled by wet suppression;~~ **One (1) No. 103-A swinging pendulum magnet.**
- (6) ~~Three (3) crushers, with maximum capacities of 700 tons of material per hour each, with PM controlled by wet suppression; and~~ **One (1) No. 104 main conveyor with a maximum capacity of 1,260 tons per hour.**
- (7) ~~Three (3) open air stock aggregate piles with a total combined maximum capacity of 2,000,000 tons.~~ **One (1) 42" mag head pulley.**
- (8) **One (1) Nos. 105 and 106 screens with a maximum capacity of 630 tons per hour each.**
- (9) **One (1) No. 107 conveyor with a maximum capacity of 550 tons per hour.**
- (10) **One (1) No. 109 radial stacker with a maximum capacity of 550 tons per hour.**
- (11) **One (1) 30" mag head pulley.**
- (12) **One (1) No. 107-A conveyor with a maximum capacity of 550 tons per hour.**

- (13) One (1) No. 110 radial stacker with a maximum capacity of 550 tons per hour.
- (14) One (1) 24" mag head pulley.
- (15) One (1) No. 111 crusher with a maximum capacity of 700 tons per hour.
- (16) One (1) No. 108 conveyor with a maximum capacity of 300 tons per hour.
- (17) One (1) No. 139 conveyor with a maximum capacity of 210 tons per hour.
- (18) One (1) No. 140 conveyor with a maximum capacity of 550 tons per hour.
- (19) One (1) No. 141 secondary crusher with a maximum capacity of 25 tons per hour.
- (20) One (1) No. 142 recirculatory conveyor with a maximum capacity of 250 tons per hour.
- (21) One (1) No. 143 conveyor with a maximum capacity of 225 tons per hour.
- (22) One (1) No. 144 secondary crusher with a maximum capacity of 225 tons per hour.
- (23) One (1) No. 145 recirculatory conveyor with a maximum capacity of 225 tons per hour.
- (24) One (1) No. 112 recirculatory conveyor with a maximum capacity of 410 tons per hour.
- (25) One (1) overband magnet.
- (26) One (1) 30" mag head pulley.
- (27) One (1) No. 114 recirculatory FE conveyor with a maximum capacity of 500 tons per hour.
- (28) One (1) No. 121 recirculatory FE conveyor with a maximum capacity of 50 tons per hour.
- (29) One (1) No. 120 conveyor with a maximum capacity of 110 tons per hour.
- (30) One (1) No. 120F conveyor with a maximum capacity of 10 tons per hour.
- (31) One (1) No. 120A screen with a maximum capacity of 110 tons per hour.
- (32) One (1) No. 120B conveyor with a maximum capacity of 120 tons per hour.
- (33) One (1) 42" mag head pulley.
- (34) One (1) No. 120E conveyor with a maximum capacity of 10 tons per hour.
- (35) One (1) No. 120C screen with a maximum capacity of 110 tons per hour.
- (36) Two (2) truck loading bins.
- (37) One (1) No. L-7 conveyor with a maximum capacity of 35 tons per hour.
- (38) One (1) 24" mag head pulley.

A.3(d), IDEM OAQ has no record that the throughput of the CM-13 plant is 350 tons of slag per hour, as a result only the following changes have been made:

- ~~(1) One (1) front end loader;~~
- (21) One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;
- ~~(32)~~ (32) One (1) open conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression;
- (43) Two (2) 4.25 cone crushers, with a maximum capacity of 700 tons of material per hour, with PM controlled by wet suppression; **and**
- ~~(54)~~ (54) One (1) open fines conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression; **and**.
- ~~(6) One (1) open air fines pile.~~

The throughput increase requested for A.3(e) has not been made. This equipment was initially reviewed under Significant Source Modification 127-15319-00026, issued May 30, 2002, and Minor Source Modification 127-19102-00026, issued July 23, 2004. The 250 tons per hour throughput, and associated limits under condition D.2.2, were carried into the operating permit based on those approvals. In April 2005, Linda Sturgess of the Levy Company, requested throughput increases to this equipment. At that time, she was informed that an application requesting another source modification should be submitted. Modifications to Part 70 sources can be accomplished pursuant to 326 IAC 2-7-10.5. As a result, no throughput increases have been made to A.3(e).

Additionally, the changes above have also been made to the descriptions in their respective Section Ds.

Comment 5: Levy transferred ownership of this facility in October of 2005 to Calumite Company, LLC and no longer owns or operates the facility. We request deletion of Calumite Plant references and we have provided corrections to the insignificant activities list to include all applicable activities that are defined under 326 IAC 2-7-1(21) for Burns Harbor.

Response 5: See Response 2 concerning this matter.

Comment 6: B.15 (Deviations from Permit Requirements and Conditions):

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. A deviation is not:

(1) An emergency as defined in 326 IAC 2-7-1(12), or

- (2) *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*
(3) *An excursion from compliance monitoring parameters as identified in applicable Section D's unless tied to an applicable rule or limit.*

We request this addition (above in italics) to clarify what does not constitute a deviation. This clarification has been allowed and included by IDEM in other major source facility permits.

Response 6: The requested change will not be made to condition B.15. It is not known which major source facility permits are being referred to in the above comment. The intent of the Part 70 permit program is to ensure continuous compliance with the applicable requirements. Therefore, the OAQ requires that compliance monitoring data for the complete duration of the operation should be reviewed for determining 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. IDEM, OAQ generally handles concerns regarding the non-availability of 100% of compliance monitoring data as expressed in the comment above by exercising "enforcement discretion" in the decision of whether to pursue these matters or not. IDEM Office of Enforcement (OE) works closely with the Permittee to understand, in great detail, any physical constraints or realistic factors influencing the information availability. IDEM, OE evaluates the missing information on a case by case basis.

Comment 7: (Section D.1 Description Box)

[Item (a)]: Item (a) suggests there is a capacity of processing 5 slag pots per hour at the facility. We request that this statement be removed. Several slag pots may be staged inside the shop before being moved to the processing area and it is possible to have more than 5 pots moving into the processing area at any given time.

[Item (b)]: Item (b) contains errors in the description of the slag pot preparation process. Water is not used because of safety reasons. Additionally, blast furnace burden and limestone slurry are not part of this process.

[Item (c)]: We have provided corrections to the equipment listing in item (c). The overall throughput remains unchanged at 1,100 tph and the corrections to the individual equipment within the unit does not change emission levels. The overall throughput of this unit is controlled and limited by the feeder capacity of 1,100 tph. We feel that the listing of stockpiles is not appropriate for this type of operation and stockpile locations and quantities change frequently. We feel it is more appropriate to include stockpiles in the insignificant activities section of the permit as is commonly done in other aggregate operation permits.

[Item (d)]: We have provided corrections to the equipment listing in item (d). The overall throughput remains unchanged at 350 tph and the corrections to the individual equipment within the unit does not change emission levels. The overall throughput of this unit is controlled and limited by the feeder capacity of 350 tph which remains unchanged. We feel that the listing of stockpiles is not appropriate for this type of operation and stockpile locations and quantities change frequently. We feel it is more appropriate to include stockpiles in the insignificant activities section of the permit as is commonly done in other aggregate operation permits. We also feel it is inappropriate to list mobile equipment (front end loader) in the facility description boxes. It is not commonly done in other facility permits. The front end loader is not exclusive to this operating unit.

Response 7: Please see Response 4 (A.3(a) through (d)).

Comment 8: (Condition D.1.1, Particulate)

We request the correction to the capacity of the CM-13 Plant which is limited by the feeder capacity at 350 tph. This does not change the overall capacity of the plant which is 350 tph. This also does not constitute a change in emission levels. The feeder capacity remains unchanged in the permit.

Response 8: Please see Response 4 (A.3(e)).

Comment 9: (Condition D.1.2, Particulate Matter)

D.1.2 Particulate Matter [326 IAC 2-7-6(6)]

The Permittee shall use wet suppression to control emissions of PM and PM-10 from the conveyors, screens, feeders, hoppers, crushers and stackers, *weather permitting*. The suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 5-1 and Condition C.2.

We request removal of the reference to limit the moisture content of the slag material as a means of controlling PM and the reference to use wet suppression at all times the emission units operate. A slag operation can not operate with continuous wet suppression due to quality issues and weather conditions. The limitation of greater than 2% moisture does not have basis and can not be consistently maintained in slag material. Ambient weather conditions do not allow control of moisture above 2% in slag and internal moisture in slag is not an indication of external moisture to control fugitive dust. This type of limitation has not been observed in other slag operation permits and we request this condition be removed. The reference to 326 IAC 6-3-2 demonstrates a limitation that is not measureable under the process weight rule and there is no test method or protocol for demonstrating compliance with 326 IAC 6-3-2. We believe it is more appropriate to cite 326 IAC 5-1-2 and Condition C.2 because the intent to control PM is to meet the applicable opacity standards.

Response 9: The Significant Source Modification 127-15319-00026, issued May 30, 2002, determined that wet suppression was necessary for the slag handling equipment to ensure compliance with 326 IAC 6-3-2 and 326 IAC 2-7-6. Therefore, it has been determined that wet suppression is necessary for the equipment listed in D.1 in order to demonstrate compliance with 326 IAC 6-3-2 and 326 IAC 2-7-6. There has been no change to this condition as a result.

Comment 10: (D.1.4 Record Keeping Requirements) We request removal of this condition for the reasons stated in the comments to Section D.1.2 above.

Response 10: Condition D.1.4 will not be removed because no changes have been made to D.1.2 as discussed in Response 9.

Comment 11: (Section D.2) We have provided corrections to the equipment listing and overall throughput. The overall throughput is actually 350 tph versus 250 tph. Corrections to individual equipment pieces within the unit do not increase the overall throughput beyond 350 tph. Levy provided supporting emission calculations included in the TSD (Appendix A, page 2) to support the correction from 250 tph to 350 tph which did not trigger offsets or PSD.

Response 11: Please see Response 4 (A.3(e)), the overall throughput has not been revised for this process.

Comment 12: The overall throughput is actually 350 tph versus 250 tph. Levy provided supporting emission calculations which are included in the TSD (Appendix A, page 2) to support the correction from 250 tph to 350 tph which did not trigger offsets or PSD.

Response 12: As discussed in Response 4 (A.3(e)), the overall throughput has not been revised for this process.

Comment 13: (D.2.2, PSD Minor Limit) The limits provided in the table are published AP-42 emission factors. We do not think it is appropriate to list AP-42 emission factors as a surrogate for the application of limits on fugitive emission units which are not testable. We have not observed these limits used in other slag processing facility permits. The process is limited to 350 tons per hour which does not trigger PSD or Offsets.

Response 13: This process is not limited to 350 tons per hour. As noted in this condition, Significant Source Modification 127-15319-00026, issued May 30, 2002, and Minor Source Modification 127-19102-00026, issued July 23, 2004, established that the throughput for this process is 250 tons per hour. These modifications were not appealed by Levy Company. Please see Response 4 (A.3(e)) regarding why changing the overall throughput for this process cannot be accomplished after the public comment period. As a result, no changes have been made to this condition.

Comment 14: (D.2.4, Fugitive Particulate Matter Emission Limitations) We believe 326 IAC 6-5 is applicable to nonattainment areas for particulate matter, Porter County is unclassified for PM-10.

Response 14: 326 IAC 6-5-1(b) notes that 326 IAC 6-5 applies to, "Any new source of fugitive particulate matter emissions, located anywhere in the state, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985." Because the Levy Company does not have the necessary preconstruction approvals prior to this established date, this rule applies. As a result, no changes have been made to this condition.

Comment 15: We request removal of the reference to limit the moisture content of the slag material as a means of controlling PM and the reference to use wet suppression at all times the emission units operate. A slag operation can not operate with continuous wet suppression due to quality issues and weather conditions. The limitation of greater than 2% moisture does not have basis and can not be consistently maintained in slag material. Ambient weather conditions do not allow control of moisture above 2% in slag and internal moisture in slag is not an indication of external moisture

to control fugitive dust. This type of limitation has not been observed in other slag operation permits and we request this condition be removed. The reference to 326 IAC 6-3-2 demonstrates a limitation that is not measurable under the process weight rule and there is no test method or protocol for demonstrating compliance with 326 IAC 6-3-2. We believe it is more appropriate to cite 326 IAC 5-1-2 and Condition C.2 because the intent to control PM is to meet the applicable opacity standards.

Response 15: Please see Response 9. As a result, D.2.5 has not been changed.

Comment 16: (D.2.6, Fugitive Particulate Matter Emission Limitations) We believe 326 IAC 6-5 is applicable to nonattainment areas for particulate matter, Porter County is unclassified for PM-10.

Response 16: Please see Response 14. As a result, D.2.6 has not been changed.

Comment 17: (D.2.8, Record Keeping Requirements) We request removal of this condition for the reasons stated in the comments to Section D.2.5 above.

Response 17: Please see Response 14. As a result, D.2.8(a) has not been deleted.

Comment 18: Levy transferred ownership of this facility in October of 2005 to Calumite Company, LLC and no longer owns or operates the facility. We request deletion of Calumite Plant references and we have provided corrections to the insignificant activities list to include all applicable activities that are defined under 326 IAC 2-7-1(21) for Burns Harbor.

Response 18: Please see Response 2.

Comment 19: Levy transferred ownership of the Calumite Plant in October of 2005 to the Calumite Company, LLC and no longer owns or operates the facility. We request all references to the Calumite Plant be removed from the Levy permit and that a separate operating permit be issued to Calumite Company, LLC for the Calumite Plant at the Port of Indiana.

Response 19: Please see Response 2.

Comment 20: We request all corresponding sections in the TSD also be revised with the comments provided for the permit document.

Response 20: IDEM OAQ prefers that the TSD remain as it was during public notice. No changes have been made to the TSD as a result of this Addendum to the Technical Support Document (or ATSD). Any corrections that need to be made to the TSD are addressed in this ATSD, which serves as the documentation of these changes.

Upon further review, the IDEM Office of Air Quality (OAQ) has made the following revisions to the permit (bolded language has been added, the language with strikethrough has been deleted). In addition, although not shown below, The Table of Contents has also been modified to reflect these revisions where necessary.

Revision 1: Since the public notice began, there has been a change in the signatory. This only affects the box on the cover page. The change is as follows:

Operation Permit No.: T127-7656-00026	
Issued by: Paul Dubonetzky, Assistant Commissioner Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

Revision 2: A reference to condition A.2 has been added to the second sentence of the first paragraph in Section A because condition A.2 is not federally enforceable. The second sentence now reads as:

The information describing the source contained in conditions A.1, **A.2**, A.3, and A.4 is descriptive information and does not constitute enforceable conditions.

Revision 3 The explanation regarding common control between the primary operation and the supporting operation in condition A.2 has been deleted from the permit. This explanation was included in the TSD, and it is not necessary to include this in the operating permit itself. Additionally, as noted in Response 2, the calumite plant has also been removed from the permit due to new ownership. The change to A.2 reads as follows:

The Levy Company, Inc., operates this slag finishing operation, ~~and~~ **and** separation plant, ~~and calumite plant,~~ and is a contractor of ISG Burns Harbor, LLC:

- (a) ISG Burns Harbor, LLC (plant ID 127-00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (b) The Levy Company (plant ID 127-00026), the secondary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; ~~and.~~
- (c) ~~The Levy Company (plant ID 127-00024), the secondary operation, is located at Port of Indiana, 900 George Nelson Drive, Portage, Indiana.~~

~~IDEM has determined that ISG Burns Harbor, LLC and The Levy Company are under the common control of ISG Burns Harbor, LLC. These three plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Burns Harbor, LLC, and The Levy Company (Burns Harbor site and Port of Indiana site), as one source.~~

Separate Part 70 permits will be issued to ISG Burns Harbor, LLC (TV 127-6301-00001) and The Levy Company (TV 127-7656-00026) solely for administrative purposes.

Revision 4: To further clarify the intent of condition B.9, Annual Compliance Certification, the second sentence of part (a) has been changed to read as:

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:

Revision 5 Language regarding requests for a PMP extension was inadvertently left out of B.10, Preventive Maintenance Plan. Therefore, the following language has been added to the end of part (a):

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
Indianapolis, Indiana 46204-2251**

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

Revision 6: An IDEM telephone number and facsimile number have been updated in condition B.11, Emergency Provisions. These two items are found under (b)(4) of this condition. They both now read as follows:

Telephone Number: 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile Number: 317-233-~~5967~~ **6865**

Additionally, these two numbers have also been updated on the Emergency Occurrence Report form of the operating permit.

Revision 7: To reflect the wording of 326 IAC 2-7-15(a), condition B.12, Permit Shield, has a deletion in the second sentence of part (a). The sentence now reads as:

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.

Revision 8: It has been decided that part (d) concerning nonroad engines from condition B.18, Permit Amendment or Modification, should be removed. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new. Previously part (d) read as:

- (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.~~

Revision 9: The Credible Evidence condition, B.25, has been updated as follows:

- B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]
~~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. For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.~~

Revision 10: C.18, General Record Keeping Requirements, has the following correction to part (c)(1)(C)(iii):

- Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(~~3~~)(iii); and

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: Levy Company, Inc.- a contractor of ISG Burns Harbor, LLC
Source Location: U.S. Highway 12, Burns Harbor, Indiana 46304
County: Porter
SIC Code: 3295
Operation Permit No.: T127-7656-00026
Permit Reviewer: Melissa Groch

The Office of Air Quality (OAQ) has reviewed a Part 70 operating permit application from Levy Company, Inc., relating to the operation of a blast furnace and basic oxygen furnace slag finishing plant and separation plant.

Source Definition

This blast furnace and basic oxygen furnace slag finishing plant, separation plant, and calumite plant is operated by a contractor of an integrated steel mill:

- (a) ISG Burns Harbor, LLC (plant ID 127-00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (b) Levy Company (plant ID 127-00026), the secondary operation, is located at U.S. Highway 12, Burns Harbor, Indiana; and
- (c) The Levy Company (plant ID 127-00024), the secondary operation, is located at Port of Indiana, 900 George Nelson Drive, Portage, Indiana.

IDEM has determined that ISG Burns Harbor, LLC and Levy Company are under the common control of ISG Burns Harbor, LLC. These plants are considered one source due to contractual control. Therefore, the term "source" in the Part 70 documents refers to both ISG Burns Harbor, LLC, and Levy Company (Burns Harbor site and Port of Indiana site) as one source.

Separate Part 70 permits will be issued to ISG Burns Harbor, LLC (TV 127-6301-00001) and The Levy Company (TV 127-7656-00026) solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

The Levy Companies at Burns Harbor and the Port of Indiana consist of the following permitted emission units and pollution control devices:

Burns Harbor Site

- (a) An open air Slag Pot Dumping operation constructed in 1969 which receives slag pots by front end loader from the BOF, identified as EU001-01, with a maximum of 5 slag pots per hour, with collective fugitive emissions EP001-9011.
- (b) An open air Slag Pot Preparation operation constructed in 1969, identified as EU001-04, consisting of relining and conditioning of empty pots (Pot Material Addition) with a limestone slurry, blast furnace slag burden, and water for return to the BOF, with collective fugitive emissions EP001-9001.
- (c) An open air Blast Furnace and BOF Slag Batch Unloading/Processing/Loading operation (Separation Plant) constructed in 1969, identified as EU001-02, with a maximum capacity of 1,150 tons of material

per hour, with PM controlled by water sprays, and collective fugitive emissions EP001-9002, consisting of the following equipment:

- (1) One (1) blast furnace slag surge pit;
 - (2) One (1) BOF slag surge pit cooled by a water canon;
 - (3) One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;
 - (4) One (1) sizing mill with three (3) vibrating screens, with maximum capacities of 630 tons of material per hour each, and PM controlled by wet suppression;
 - (5) Twelve (12) open conveyors, and two (2) stackers, with maximum capacities of 1,260 tons of material per hour each, with PM controlled by wet suppression;
 - (6) Three (3) crushers, with maximum capacities of 700 tons of material per hour each, with PM controlled by wet suppression; and
 - (7) Three (3) open air stock aggregate piles with a total combined maximum capacity of 2,000,000 tons.
- (d) An open air Slag Processing operation (CM-13 Plant) constructed in 1969, identified as EU001-03, with a maximum capacity of 70 tons of slag per hour, and collective fugitive emissions EP001-9003, consisting of:
- (1) One (1) front end loader;
 - (2) One (1) feed hopper, with a maximum capacity of 350 tons of material per hour, with PM controlled by wet suppression;
 - (3) One (1) open conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression;
 - (4) Two (2) 4.25 cone crushers, with a maximum capacity of 700 tons of material per hour, with PM controlled by wet suppression;
 - (5) One (1) open fines conveyor, with a maximum capacity of 1,260 tons of material per hour, with PM controlled by wet suppression; and
 - (6) One (1) open air fines pile.
- (e) An open air Blast Furnace and BOF Slag Finishing Plant constructed in 2003, identified as EU001-05, with a maximum capacity of 250 tons of material per hour, with PM emissions controlled by wet suppression, and collective fugitive emissions EP001-9005, consisting of the following pieces of equipment:
- (1) Two Syntron Feeders (F1 and F2), with a capacity of 250 tons per hour each;
 - (2) One 30 inch by 95 foot conveyor (B), with a capacity of 250 tons per hour;
 - (3) One 30 inch conveyor (A1), with a capacity of 250 tons per hour;
 - (4) One 6 foot by 16 foot D.D Screen, with a capacity of 250 tons per hour;
 - (5) One 30 inch by 150 foot Stacker conveyor (C), with a capacity of 48 tons per hour;
 - (6) One 36 inch conveyor (D), with a capacity of 250 tons per hour;
 - (7) One 30 inch conveyor (E), with a capacity of 250 tons per hour;
 - (8) One 8 foot by 20 foot TD Screen (SC2), with a capacity of 250 tons per hour;
 - (9) One 60 inch conveyor (F), with a capacity of 110 tons per hour;
 - (10) One 30 inch conveyor (G), with a capacity of 110 tons per hour;
 - (11) One 30 inch conveyor (H), with a capacity of 50 tons per hour;
 - (12) One 5 foot by 12 foot horizontal screen (SC3), with a capacity of 50 tons per hour;
 - (13) One 36 inch by 150 foot radial stack conveyor (S4), with a capacity of 110 tons per hour;
 - (14) One 24 inch by 100 foot radial stack conveyor (S5), with a capacity of 50 tons per hour;
 - (15) One 30 inch conveyor (I), with a capacity of 200 tons per hour;
 - (16) One 24 inch by 150 foot radial stack conveyor (S3), with a capacity of 200 tons per hour;
 - (17) One 30 inch conveyor (J), with a capacity of 113 tons per hour;
 - (18) One 24 inch conveyor (K), with a capacity of 113 tons per hour;
 - (19) One 24 inch by 100 foot radial stack conveyor (S2), with a capacity of 113 tons per hour;
 - (20) One barge hopper (BH-1);
 - (21) One barge stacker (BS-1); and

Four additional conveyors constructed in 2004;

- (22) One 24 inch by 65 foot conveyor (T1), with a capacity of 110 tons per hour;

- (23) One 24 inch by 65 foot conveyor (T2), with a capacity of 200 tons per hour;
- (24) One 30 inch by 30 foot conveyor (T3), with a capacity of 48 tons per hour; and
- (25) One 30 inch conveyor (A2), with a capacity of 250 tons per hour.

Port of Indiana Site

(f) Calumite Plant:

- (1) one (1) calumite plant slag dryer, identified as Cal-200 - unit 207, originally constructed in 1980 and modified in 1994, with a maximum capacity of 40 tons per hour, equipped with one (1) No.2/No.4 fuel oil fired burner with a maximum rated capacity of 49.3 MMBtu per hour, with PM controlled by one (1) baghouse, identified as unit 237, exhausting to stack 1;
- (2) one (1) calumite plant screening tower process consisting of screening, crushing, conveying, and railcar loadout, with a maximum throughput of 70 tons per hour, with PM controlled by three (3) dust collectors constructed in 1980, each identified as units 232, 233 and 234, exhausting at stacks 2, 3 and 4, respectively;
- (3) One (1) horizontal screw conveyor, constructed in 2000, with a maximum capacity of 42 tons per hour;
- (4) One (1) crusher, constructed in 2000, with a maximum capacity of 160 tons per hour, and PM controlled by wet suppression;
- (5) One (1) bucket elevator, constructed in 2000, with a maximum capacity of 300 tons per hour; and
- (6) Two (2) screens, constructed in 2000, each with a maximum capacity of 26 tons per hour, with PM controlled by wet suppression and one (1) dust collector, identified as unit 234, exhausting at stack 5.

Unpermitted Emission Units and Pollution Control Equipment

There are no known unpermitted facilities operating at this source during this review process.

Insignificant Activities

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

- (a) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, and automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (b) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids that contain VOC and/or HAPs.
- (c) Degreasing operations that do not exceed 145 gallons per 12 month, except if subject to 326 IAC 20-6.
- (d) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) Activities with emissions equal to or less than insignificant thresholds:
 - (1) 17,000 gallon diesel AST identified as EU001-9011;
 - (2) 11,000 gallon diesel AST identified as EU001-9012;
 - (3) Iron breakup processing identified as EU001-9014; and
 - (4) Portable crushing and screening operation identified as EU001-9015.

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

- (a) Unpaved roads;
- (b) Aggregate (slag) storage piles; handling and wind erosion;
- (c) Two fuel oil storage tanks each less than 10,000 gallons capacity;
- (d) Welding for maintenance purposes;
- (e) 12 gallon mineral spirits tank for degreasing metal parts;
- (f) One crusher; and
- (g) One bucket elevator.

Existing Approvals

The Levy Company site located in Burns Harbor has been operating under previous approvals including, but not limited to, the following:

- (a) OP 3420-0026-0259, issued September 5, 1990;
- (b) Significant Source Modification 127-15319-00026, issued May 30, 2002; and
- (c) Minor Source Modification 127-19102-00026, issued July 23, 2004.

The Levy Company site located in the Port of Indiana has been operating under previous approvals including, but not limited to, the following:

- (a) Registration 127-3799-00024, issued July 11, 1994;
- (b) FESOP 127-5567-00024, issued December 12, 1996;
- (c) First Administrative Amendment 127-9254-00024, issued January 7, 1998;
- (d) Second Administrative Amendment 127-11252-00024, issued September 9, 1999;
- (e) First Significant Permit Revision 127-12042-00024, issued July 17, 2000;
- (f) Third Administrative Amendment 127-12638-00024, issued October 13, 2000; and
- (g) Administrative Amendment 127-19337-00024, issued August 26, 2004.

All conditions from previous approvals were incorporated into this Part 70 operating permit, except the following:

- (a) FESOP 127-5567-00024, issued on December 12, 1996:

Sections D.1 and D.2
All conditions.

Reason Changed: General changes have been made to the operating permit, regarding Sections D.1 and D.2. The Calumite Plant at this site is now included in the Part 70 operating permit (Section D.4) T127-7656-00026, based on the determination that it is to be considered as one source with the Levy operations at the Burns Harbor site for the purposes of the Part 70 operating permit program. The Finishing Plant facilities at the Port of Indiana site have been shut down and dismantled. As a result, this equipment has not been carried over into the Part 70 operating permit.

Condition D.1.4

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from the 49.3

million Btu per hour burner for the slag dryer shall be limited to 0.5 pounds per million Btu heat input or a sulfur content of less than or equal to 0.49 percent when using fuel oils #2 and #4. Therefore, the requirements of 326 IAC 2-7 will not apply.

Reason Changed: The last sentence of condition D.1.4 was deleted because this source has been combined into another Part 70 source as mentioned previously. Also, this condition has been updated to reflect current rule language.

Condition D.2.1

The Finishing Plant total throughput shall not exceed 305,000 tons per month, based on a fixed monthly limit. Therefore, the requirements of 326 IAC 2-7 will not apply.

Reason Changed: This throughput limit is no longer necessary because the Finishing Plant at the Port of Indiana site has been shut down and dismantled.

- (b) First Significant Permit Revision 127-12042-00024, issued on July 17, 2000;

Condition D.1.1

Pursuant to 326 IAC 6-3 (Process Operations) the particulate matter emissions from the slag dryer shall not exceed 47.1 lbs per hour.

Reason changed: The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) were inadvertently omitted from condition D.1.1 when the permit was revised for the related new equipment. Therefore, this condition has been revised to include all previously omitted processes.

Condition D.1.2

- (a) Pursuant to 326 IAC 2-8-4, PM-10 emissions from the aggregate mixing and drying operations shall not exceed 10.36 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.
- (b) Pursuant to 326 IAC 2-8-4, PM-10 emissions from the one (1) crusher shall not exceed 0.09 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.
- (c) Pursuant to 326 IAC 2-8-4, PM-10 emissions from the one (1) screw conveyor and one (1) bucket elevator shall not exceed 0.48 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.
- (d) Pursuant to 326 IAC 2-8-4, PM-10 emissions from the two (2) screens shall not exceed 0.15 pounds per hour, including both filterable and condensible fractions. Compliance with this limit will satisfy 326 IAC 2-8-4. Therefore, the Part 70 rules (326 IAC 2-7) do not apply.

Condition D.1.3

The Calumite plant total throughput shall not exceed 28,229 tons per 12 consecutive month period, rolled on a monthly basis.

Reason Changed: Conditions D.1.2 and D.1.3 are not needed in this Part 70 operating permit because this source has been combined into another Part 70 source as mentioned previously, and therefore, limits to satisfy 326 IAC 2-8-4 are not necessary.

- (c) Significant Source Modification 127-15319-00026, issued May 30, 2002;

Condition D.1.1:

Applicability of 326 IAC 6-3-2 as it applies to the Finishing Plant (Burns Harbor site) process.

Reason Changed: The process weight rate for the entire process is used in the formula instead of the rate from each individual piece of equipment.

(d) Minor Source Modification 127-19102-00026, issued July 23, 2004;

Condition D.1.1:

Applicability of 326 IAC 6-3-2 as it applies to the Finishing Plant (Burns Harbor site) process.

Reason Changed: The process weight rate for the entire process is used in the formula instead of the rate from each individual conveyor.

History

Levy Company applied for a Part 70 operating permit on December 6, 1996, for the Burns Harbor site. On May 30, 2002, Levy Company, Inc., (a contractor of ISG Burns Harbor, LLC) was issued a Significant Source Modification permit giving them approval to construct a new Finishing Plant at their existing facility. The equipment from the new Finishing Plant handles and processes blast furnace slag (a waste product from ISG Burns Harbor, LLC) which has been processed in the Levy Co. Separation Plant. It has been established that the Levy Company is a contractor of ISG Burns Harbor, LLC. Additionally, iron recovered by Levy from their Separation Plant is sold back to ISG Burns Harbor for processing in the mill.

Finished product from the Separation Plant is sent to a second Levy Company site (Calumite Plant) at the Port of Indiana. This site is in proximity to the Levy Company site at ISG Burns Harbor, LLC. The Port of Indiana site only processes material trucked over from the Burns Harbor site. This material is trucked to the Port of Indiana site by way of a private road. Because of these facts, the Port of Indiana Levy Company site (127-00024) has been combined with the Burns Harbor Levy Company site (127-00026).

The Port of Indiana site also had a Finishing Plant which has been shut down and dismantled. This is not to be confused with the existing Finishing Plant that Levy Co. operates at their Burns Harbor site.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Operating 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 application for the purposes of this review was received on December 20, 2001.

Emission Calculations

The approval for Significant Source Modification 127-15319-00026, issued May 30, 2002, includes the calculations reviewed for the new Finishing Plant. The calculations below were submitted by the Levy Company with their Part 70 permit application for the Burns Harbor site:

EU001-01 Slag Pot Dumping: The emission factor for the Iron and Steel Production (AP-42 Section 12.5, Table 12.5-4) predicts the uncontrolled emissions attributed to the batch drop of high silt slag from the slag pot dumping to be 0.026 lbsTSP/ton of slag.

Maximum amount of slag processed annually: 1,353,000 tons of BOF slag per year

$$\begin{aligned} \text{TSP emissions} &= [(1,353,000 \text{ tons slag/yr}) \times (0.026 \text{ lbs TSP/ton slag})] (2000 \text{ lbs/ton}) \\ &= 17.59 \text{ tons TSP/year} \end{aligned}$$

For PM10, AP-42 Section 12.5, Table 12.5-4, predicts the uncontrolled emissions to be 0.013 lbs PM-10/ton of slag.

$$\begin{aligned} \text{PM-10 emissions} &= [(1,353,000 \text{ tons slag/yr}) \times (0.013 \text{ lbs PM-10/ton slag})] \times (2000 \text{ lbs/ton}) \\ &= 8.79 \text{ tons PM-10/year} \end{aligned}$$

EU001-04 Slag Pot Preparation:

Pot Spraying: The pots are sprayed with 100 gallons of the mixture which contains 30% solids. The pot is hot when sprayed and water is discharged as steam. Some of the solids are carried by the steam.

The emissions from the pot spraying will be estimated using emission factors for sodium carbonate pre-dryers. All the pre-dryers used in sodium carbonate production have an average TSP emission factor of 3.6 lbs. TSP/ton of product. Assume PM-10 = 50% of TSP. The specific gravity of the spray is approximately 1.20.

$$\text{Maximum number of pots sprayed per year} = 23092$$

$$\begin{aligned} \text{Weight of spray} &= (8.33 \text{ lb. water/ gallon})(1.20 \text{ lb. spray/lb. water}) (100 \text{ gallons/pot}) (23,092 \text{ pots/year}) \\ &= 23,082,763 \text{ lbs./yr. or } 11,541.4 \text{ tons spray/year} \end{aligned}$$

$$\begin{aligned} \text{TSP emissions} &= (11,541.4 \text{ tons spray/yr.}) (3.6 \text{ lbs. TSP/ton spray}) \\ &= 41,549 \text{ lbs. TSP/year or } 20.8 \text{ tons TSP/year} \end{aligned}$$

$$\begin{aligned} \text{PM-10 emissions} &= (41,549 \text{ lbs. TSP/year})(0.5) \\ &= 20,774.5 \text{ lbs. PM-10/year or } 10.4 \text{ tons PM10/year} \end{aligned}$$

Pot Material Addition: The emission factor for the Iron and Steel Production (AP-42 Section 12.5, Table 12.5-4) predicts the uncontrolled emissions attributed to the batch drop of high silt slag from the slag pot preparation as 0.026 lbs. TSP/ton of slag.

Density of slag	= 1.35 tons per cubic yard of slag
Amount of material added to each pot	= 7 cubic yards of BOF slag per pot or 9.45 tons
Maximum number of pots per year	= 23092

$$\begin{aligned} \text{TSP emissions} &= (9.45 \text{ tons/pot}) (23092 \text{ pots/yr.}) (0.026 \text{ lbs. TSP/ton slag}) \\ &= 5674 \text{ lbs. TSP/year or } 2.84 \text{ tons TSP/year} \end{aligned}$$

For PM-10, AP-42 Section 12.5, Table 12.5-4, predicts the uncontrolled emissions to be 0.013 lbs. PM-10/ton slag.

$$\begin{aligned} \text{PM-10 emissions} &= (9.45 \text{ tons/pot}) (23092 \text{ pots/yr.}) (0.013 \text{ lbs. PM-10/yr}) \\ &= 2837 \text{ lbs. PM-10/year or } 1.42 \text{ tons PM10/year} \end{aligned}$$

Total emissions from Slag Pot Preparation:

$$\text{TSP emissions} = 20.8 + 2.84 = 23.64 \text{ tons TSP/year}$$

$$\text{PM-10 emissions} = 10.4 + 1.42 = 11.82 \text{ tons PM-10/year}$$

The TV application did not include complete calculations for the Separation Plant and CM-13 Plant at the Burns Harbor site. Calculations for the Finishing Plant at Burns Harbor, and the Calumite Plant at the Port of Indiana, are included in Appendix A of this document. These calculations were performed by Levy Company, Inc., and submitted on April 6, 2005.

Potential To Emit of Entire Source

Pursuant to 326 IAC 2-7-1(29), 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
Total HAPs	greater than 25

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 2-7-1(29)) of PM-10, SO₂, CO, and NO_x are equal to or greater than 100 tons per year, and the potential to emit (as defined in 326 IAC 2-7-1(29)) 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 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (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 - Levy Company, Inc.

The following table shows the actual emissions from Levy Company, Inc. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)	
	Burns Harbor	Port of Indiana
PM	-	-
PM-10	13.0	-
SO ₂	-	-
VOC	-	-
CO	-	-
NO _x	-	-
HAP (specify)	-	-

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM 2.5	Nonattainment
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
1-hour Ozone	Severe nonattainment
8-hour Ozone	Moderate nonattainment

CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
- (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. Porter County has been designated as severe 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. Porter County has been designated as moderate nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) Porter County has been classified as moderate nonattainment in Indiana for the 8-hour ozone standard. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) U.S. EPA, in Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Porter County as nonattainment for PM 2.5. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM 2.5 emissions pursuant to the Nonattainment New Source Review requirements. See the State Rule Applicability - Entire Source section.
- (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- Levy Company

- (a) The diesel storage tanks (EU001-9011 and 9012) and the two fuel oil storage tanks (each less than 10,000 gallons) each have capacities less than 75 cubic meters (19,812.90 gallons), therefore, the New Source Performance Standards for Volatile Organic Liquid Storage Vessels (40 CFR 60.110b - 117b, Subpart Kb) are not included in this Part 70 operating permit.
- (b) No other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are included in this Part 70 operating permit for the Levy Company operations, as noted below:
- (1) 40 CFR Part 60, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) is not included in this permit because the original ore is expanded and vitrified in a furnace which alters the physical and chemical makeup of the ore, producing a slag by-product that does not meet the definition of a nonmetallic mineral in 40 CFR Subpart 60.671.

- (2) 40 CFR Part 60, Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) is not included in this permit because the operations are not producing metallic mineral concentrates from ore. Also, the slag crushing and/or screening operations are not performed in a mine or pit.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 40 CFR Part 61 and 40 CFR Part 63) included in this Part 70 operating permit for Levy Company, Inc.
- (d) The owner or operator of Levy Company, Inc., shall submit a CAM (Compliance Assurance Monitoring) plan as part of their Part 70 Operating Permit renewal application. Prior to the renewal, if the owner or operator submits an application for a significant permit revision, they shall also submit a CAM plan with respect to those pollutant-specific emissions units for which the proposed permit revision is applicable.

State Rule Applicability - Entire Source

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

Significant Source Modification 127-15319-00026, issued May 30, 2002, was not considered major because the PM and PM10 emissions were limited to less than the PSD significant levels and the Emission Offset significant levels. Therefore, PSD (326 IAC 2-2) and Emission Offset (326 IAC 2-3) requirements are not included in this Part 70 operating permit.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this blast furnace and basic oxygen furnace slag finishing plant and separation plant will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs, therefore, 326 IAC 2-4.1 is not included in this Part 70 operating permit.

326 IAC 2-6 (Emission Reporting)

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:

- (a) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (b) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

Since Levy Company, Inc., is considered one source with ISG Burns Harbor, LLC, it is required to submit an annual emission statement for the actual emissions by July 1.

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 forty percent (40%) 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 6-4 (Fugitive Dust Emissions)

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

State Rule Applicability - Individual Facilities of Levy Company

Burns Harbor Site

Separation Plant and CM-13 Plant

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Separation Plant (EU001-02) and the CM-13 Plant (EU001-03) shall not exceed 79.4 and 47.8 pounds per hour when the Separation Plant is operating at a capacity of 1,150 tons of material per hour, and when the CM-13 Plant is operating at a capacity of 70 tons of slag per hour, respectively. The pounds per hour limitation was calculated with the following equation:

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

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

Compliance with these limits is established through the use of the controlled (wet suppression) emission factors for crushed stone processing found in Table 11.19.2-2 of AP-42 (1/95).

Finishing Plant

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable PM emission rate from the Finishing Plant (EU001-05) shall not exceed 61.0 pounds per hour when operating at a process weight rate of 250 tons per hour. The pounds per hour limitation was calculated with the following equation:

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

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

Compliance with these limits is established through the use of the controlled (wet suppression) emission factors for crushed stone processing found in Table 11.19.2-2 of AP-42 (1/95).

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Significant Source Modification 127-15319-00026, issued May 30, 2002, the PM and PM-10 emission rates from the Finishing Plant unit operations shall not exceed the values indicated below:

Process	Emission Limit (lb/ton)		Process	Emission Limit (lb/ton)	
	PM	PM10		PM	PM10
Two Syntron Feeders	0.0001008	0.000048	SD Horizontal Screen	0.0017640	0.000840
Conveyor B	0.0001008	0.000048	Radial Stacker S4	0.0001008	0.000048
Conveyor A	0.0001008	0.000048	Radial Stacker S5	0.0001008	0.000048
SD Screen	0.0017640	0.000840	Conveyor I	0.0001008	0.000048
Stacker Conveyor C	0.0001008	0.000048	Radial Stacker S3	0.0001008	0.000048
Conveyor D	0.0001008	0.000048	Conveyor J	0.0001008	0.000048
Conveyor E	0.0001008	0.000048	Conveyor K	0.0001008	0.000048
TD Screen	0.0017640	0.000840	Radial Stacker S2	0.0001008	0.000048
Conveyor F	0.0001008	0.000048	Barge Hopper BH-1	0.0001008	0.000048
Conveyor G	0.0001008	0.000048	Barge Stacker BS-1	0.0001008	0.000048
Conveyor H	0.0001008	0.000048			

These limits will limit emissions to less than 15 tons per year of PM and PM10. Therefore, 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply to this modification. These limits are based on AP-42 emission factors for controlled processes (wet suppression). Compliance with these limits will be established through the use of wet suppression (weather permitting), and the visible emissions notations. When weather conditions preclude the use of wet suppression, the source will be required to perform chemical analysis of the slag material to ensure it has a moisture content greater than 2.0 percent. The 2.0 percent value is near the

upper range of the study group used to develop the controlled AP-42 emission factors (0.55 to 2.88 percent), and historically, the moisture content of the slag material at Levy Company has been between 3 and 6 percent.

Port of Indiana Site

Calumite Plant

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

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Calumite Plant operation shall not exceed 47.77 pounds per hour when operating at a process weight rate of 70 tons per hour. The pounds per hour limitation was calculated with the following equation:

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

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

Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations) the SO₂ emissions from the 49.3 MMBtu per hour oil-fired calumite plant slag dryer shall not exceed five tenths (0.5) pound per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a thirty (30) day rolling weighted average.

Insignificant Activities with Applicable Requirements

326 IAC 2-7-1(21) (Insignificant Activities)

The emissions from activities EU001-9011, EU001-9012, EU001-9014, and EU001-9015 shall remain below the thresholds listed below to be considered as insignificant:

Lead (Pb)= 0.6 ton/year or 3.29 lbs/day	Carbon Monoxide (CO)= 25lbs/day
Sulfur Dioxide (SO ₂)= 5 lbs/hr or 25 lbs/day	Particulate Matter (PM)= 5 lbs/hr or 25 lbs/day
Nitrogen Oxides (NO _x)= 5 lbs/hr or 25 lbs/day	Volatile Organic Compounds (VOC)= 3 lbs/hr or 15 lbs/day

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

The equipment related to manufacturing activities not resulting in the emission of HAPs (brazing equipment, cutting torches, soldering equipment, welding equipment) shall comply with the following:

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

326 IAC 8-3 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-3-1(b)(2) and (c) (Applicability), the degreasing operations at Levy Company, Inc., shall comply with sections 5 through 7, and 8 of this rule, because they exist as of July 1, 1990, are located in Porter County, and use organic solvent.

The degreasing operation is cold cleaner and not open top or conveyORIZED. Therefore, only sections 5 and 8 of this rule are included in this operating permit.

326 IAC 8-3 (Volatile Organic Compounds (VOC))

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs, 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°C) (one hundred degrees Fahrenheit (100°F));

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

Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, 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 8-3 (Volatile Organic Compounds (VOC))

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 Porter County, except for solvents intended to be used to clean electronic components shall do the following:

- (a) 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).
- (b) 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).
- (c) 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.

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

Pursuant to 326 IAC 8-9-1(b), stationary vessels with a capacity of less than thirty-nine thousand (39,000) gallons (EU 001-9011 and 9012) are subject to the reporting and record keeping provisions of section 6(a) and 6(b) of this rule and are exempt from all other provisions of this rule.

Testing Requirements

No testing of the units at the Separation Plant, the CM-13 Plant, and the Finishing Plant is required because there are no stacks, and uncontrolled emissions from each unit are less than 10 pounds per hour.

Compliance Requirements

Permits issued under 326 IAC 2-7 are 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.

The compliance monitoring requirements applicable to the Levy Company operations as follows:

- (a) The Permittee shall use wet suppression to control emissions of PM and PM₁₀ from the conveyors, screens, feeders, hoppers, crushers and stackers at all times these emission units are in operation at the Levy operations Burns Harbor site. The water suppressant shall be applied in a manner and at a frequency sufficient to ensure compliance with 326 IAC 6-3 and 326 IAC 2-2. If weather conditions preclude the use of wet suppression, the Permittee shall perform chemical analysis on the slag material to ensure it has a moisture content greater than 2.0 percent.
- (b) For all processes, visible emission notations of emission units shall be performed once per day during normal daylight operations. 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. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (c) The Permittee shall record the pressure drop across the baghouse used in conjunction with the calumite plant slag dryer and the three (3) dust collectors used in conjunction with the calumite plant screening tower, at least once per day when the calumite plant slag dryer is in operation. When for any one reading, the pressure drop across the baghouse or the three (3) dust collectors is outside the normal

range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

- (d) In the event that bag failure has been observed for a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the slag dryer or screening tower processes. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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

Conclusion

The operation of this proposed Part 70 permit shall be subject to the conditions of the attached proposed Part 70 Operating Permit No. T127-7656-00026.

TSD APPENDIX A
Emissions Calculations: Separation Plant (Crushed Stone Processing)

Company Name: Levy Company, Inc.
Address City IN: US Highway 12, Burns Harbor
TV: 127-7656-00026
Reviewer: Melissa Groch

Process	Throughput Rate (tons/hr)	Emission Factor (lb/ton)				Emissions (tons/year)			
		PM*	PM10*	PM*	PM10*	PM*	PM10*	PM*	PM10*
		Uncontrolled	Uncontrolled	Controlled	Controlled	PTE	PTE	Controlled	Controlled
Separation Plant (EU 001-02)									
1 feed hopper	350	0.00294	0.00140	0.0001008	0.000048	4.507	2.146	0.155	0.074
3 sizing mill screens	630	0.03150	0.01500	0.0017640	0.000840	260.763	41.391	14.603	6.954
12 open conveyors	1260	0.00294	0.00140	0.0001008	0.000048	194.703	92.716	6.676	3.179
2 Stackers	1260	0.03150	0.01500	0.0017640	0.000840	347.684	165.564	19.470	9.272
3 crushers**	700	0.00070	0.00240	0.0012390	0.000590	6.439	22.075	3.799	1.809
CM-13 Plant (EU001-03)									
1 feed hopper	350	0.00294	0.00140	0.0001008	0.000048	4.507	2.146	0.155	0.074
1 Conveyor	1260	0.00294	0.00140	0.0001008	0.000048	16.225	7.726	0.556	0.265
2 cone crushers**	700	0.00070	0.00240	0.0012390	0.000590	2.146	7.358	3.799	1.809
1 fines conveyor	1260	0.00294	0.00140	0.0001008	0.000048	16.225	7.726	0.556	0.265
TOTAL						853.20	348.85	49.77	23.70

*PM-10 emission factors from AP-42 Table 11.19.2-2. PM emission factors are not provided in AP-42, but guidance is provided to estimate TSP emissions by multiplying the PM-10 emission factor by 2.1. Controlled factors account for water suppression.

**Tertiary crushing PM-10 emissions factors were used since there were none available for primary crushing.

Methodology

Emission (tons/yr) = Throughput (tons/hr) x Emission Factor (lb/ton)*8,760(hr/yr)/2,000 lb/ton

TSD APPENDIX A

(Calculations performed by Levy Company, Inc.)

Company Name: Levy Company, Inc.
 Address City IN: U.S. Highway 12, Burns Harbor
 TV Permit #: T127-7656-00026
 Reviewer: Melissa Groch

Calculations submitted by Levy Company, Inc., show 350 tpy as the maximum throughput.
 Source modification 127-15319-00026, issued May 30, 2002, lists 250 tpy as the maximum throughput.

Levy-ISGBH Finishing Plant

Calculations to support requested limit revision to Condition D.2.2 in draft permit T089-7719-00133.

PM PTE - based on AP-42 emission factors

PM Uncontrolled	Capacity (ton/hr)	EF (lb/ton)	PM Emissions (tons/yr)	EF Source
Loading/Unloading-Entry	350	0.00010	0.15	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Loading/Unloading-Exit	350	0.00010	0.15	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Screening	350	0.026	38.33	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Crushing	350	0.0054	8.28	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Conveyor Transfer points	350	0.003	4.80	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Total Uncontrolled Emissions			52	
Total Controlled Emissions			10	based on 80% controls from water spray system.

PM-10 PTE - based on AP-42 emission factors

PM-10 Uncontrolled	Capacity (ton/hr)	EF (lb/ton)	PM-10 Emissions (tons/yr)	EF Source
Loading/Unloading-Entry	350	0.00010	0.15	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Loading/Unloading-Exit	350	0.00010	0.15	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Screening	350	0.0087	13.34	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Crushing	350	0.0024	3.88	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Conveyor Transfer points	350	0.0011	1.89	AP-42, 11.19.2, Table 11.19.2-2, plant is limited by 350 tpy throughput capacity.
Total Uncontrolled Emissions			19	
Total Controlled Emissions			4	based on 80% controls from water spray system.

2000 lbs/ton
 8760 hrs/year potential

This plant is limited by the rate of feed equipment into the plant at 350 tons per hour. This is the maximum that can be processed throughout the plant.

TSD APPENDIX A

(Calculations performed by Levy Company, Inc.)

Company Name: Levy Company, Inc.
 Address City IN: 900 George Nelson Drive, Portage
 TV Permit #: T127-7656-00026
 Reviewer: Melissa Groch

The throughput limit calculation is no longer needed because this site has been combined into the Levy located at ISG, Burns Harbor.

PM Emission Calculations - Levy Calumite Plant

Calculations to support requested limit revision to Condition D.4.2 in draft permit T088-7718-00133.

PM PTE - based on AP-42 emission factors

PM	Capacity (ton/hr)	AP-42 Uncontrolled EF (lb/ton)	AP-42 Controlled EF (lb/ton)	PM Emissions Uncontrolled (tons/yr)	PM Emissions Controlled (tons/yr)	Control Efficiency	Control Method	EF Source	Comment
Roadways				143	72	50%	Suppression	AP-42, 13.2.2	See Transportation calculations.
Loading/Unloading-Entry	40	0.00016	0.00016	0.003	0.001	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Loadout	40	0.0001	0.0001	0.018	0.02		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Product loadout is limited by entry rate.
Primary Crushing	40	0.0054	0.0012	0.346	0.5	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Fines Crushing	111	0.039	0.003	18.361	1.5		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Screening through screening tower	111	0.025	0.0022	12.156	1.1		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Screening before the dryer	40	0.025	0.0022	4.380	2.2	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Fines Screening	6	0.3	0.0036	7.884	0.1		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the fines screens.
Conveyor Transfer points before the dryer	40	0.003	0.00014	0.526	0.3	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity throughout of the plant.
Conveyor Transfer points in screening tower	111	0.003	0.00014	1.459	0.07		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Conveyor Transfer points after the screening tower	40	0.003	0.00014	0.526	0.02		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity throughout of the plant.
Totals:				190	77				

PM-10 PTE - based on AP-42 emission factors

PM-10	Capacity (ton/hr)	AP-42 Uncontrolled EF (lb/ton)	AP-42 Controlled EF (lb/ton)	PM-10 Emissions Uncontrolled (tons/yr)	PM-10 Emissions Controlled (tons/yr)	Control Efficiency	Control Method	EF Source	Comment
Roadways				38	19	50%	Suppression	AP-42, 13.2.2	See Transportation calculations.
Loading/Unloading-Entry	40	0.00016	0.00016	0.003	0.001	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Loadout	40	0.0001	0.0001	0.018	0.02		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Product loadout is limited by entry rate.
Primary Crushing	40	0.0034	0.00054	0.420	0.2	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Fines Crushing	111	0.0150	0.00120	7.293	0.6		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Screening through screening tower	111	0.0087	0.00074	4.230	0.4		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Screening before the dryer	40	0.0087	0.00074	1.524	0.8	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the dryer.
Fines Screening	6	0.072	0.0022	1.892	0.1		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the fines screens.
Conveyor Transfer points before the dryer	40	0.0011	0.00046	0.193	0.1	50%	Suppression	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity throughout of the plant.
Conveyor Transfer points in screening tower	111	0.0011	0.00046	0.536	0.02		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity of the crusher (age mill). NOTE: this is conservative, only 40 tph can be processed through the plant total.
Conveyor Transfer points after the screening tower	40	0.0011	0.00046	0.193	0.01		Baghouse	AP-42, 11.19.2, Table 11.19.2-2	Limited by the capacity throughout of the plant.
Totals:				64	21				

2000 lb/ton
 6760 hrs/year potential

Throughput Limit Calculation:

100 TPY Threshold / 77 TPY PM PTE after controls x 40 TPY x 8760 hrs/yr = **463,568 tons per year throughput**
 100 TPY Threshold / 21 TPY PM-10 PTE after controls x 40 TPY x 8760 hrs/yr = **1,862,881 tons per year throughput**

PM is the limiting pollutant.

TSD APPENDIX A
(Calculations performed by Levy Company, Inc.)

Company Name: Levy Company, Inc.
Address City IN: 900 George Nelson Drive, Portage
TV Permit #: T127-7656-00026
Reviewer: Melissa Groch

EMISSIONS FROM UNPAVED ROADWAYS

Levy - Calumite Plant

Calculations to support requested limit revision to Condition D.4.2 in draft permit T089-7719-00133.

Annual Throughput: 453,554 tons per year

Vehicle	Estimated Maximum Throughput (tons/yr)	Tare Weight (tons)	Gross Weight (tons)	Product Weight (tons per round trip)	Round Trips/yr	Miles per round trip	VMT/yr
Customer Bulker Trucks	453,554	14	37	23	19,720	0.50	9,860
Slag Hauler Trucks	453,554	25	80	55	8,246	0.74	6,102
CAT 324 Loader (used for cleanup & mtoe)	56,694	9	11	2	28,347	0.68	19,276
988F Loader	453,554	55	64	9	50,395	0.36	18,142

Unpaved Roadways Continued

Vehicle	Mean Weight (W) (tons)	PM Emission Factor (lb/VMT)	PM10 Emission Factor (lb/VMT)	VMT/yr	UNCONTROLLED		CONTROLLED*	
					Maximum PM Annual Emissions (TPY)	Maximum PM10 Annual Emissions (TPY)	Maximum PM Annual Emissions (TPY)	Maximum PM10 Annual Emissions (TPY)
Customer Bulker Trucks	26	4.98	1.33	9,860	24.55	6.54	12.27	3.27
Slag Hauler Trucks	53	6.89	1.84	6,102	21.03	5.60	10.51	2.80
CAT 324 Loader (used for cleanup & mtoe)	10	3.27	0.87	19,276	31.49	8.39	15.75	4.20
988F Loader (slag loader)	60	7.29	1.94	18,142	66.13	17.62	33.06	8.81
					143.19	38.16	71.60	19.08

*Based on a 50% control efficiency from the periodic application of water and/or other dust suppressants.

Reference AP-42, 13.2.2 Eq (1a) and (2), Version 12/03

$$E = k((s/12)^a) ((W/3)^b) ((365-p)/365)$$

Variable	PM10 Value	Units	Description
k	1.5	lb/VMT - Table 13.2.2-2	empirical constant
a	0.9	Table 13.2.2-2	empirical constant
b	0.45	Table 13.2.2-2	empirical constant
W	see above	tons	mean vehicle weight
s	6	% (Table 13.2.2-1)(iron/steel mills)	surface material silt content
p	135	Figure 13.2.2-1	mean number of days in a year with at least 0.01 inches of precipitation

Variable	PM Value	Units	Description
k	4.9	Table 13.2.2-2	empirical constant
a	0.7	Table 13.2.2-2	empirical constant
b	0.45	Table 13.2.2-2	empirical constant
W	see above	tons	mean vehicle weight
s	6	% (Table 13.2.2-1)(iron/steel mills)	surface material silt content
p	135	Figure 13.2.2-1	mean number of days in a year with at least 0.01 inches of precipitation

Any paved roadways are calculated as unpaved roadways, conservatively.