NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Administrative Part 70 Operating Permit

for Harsco Environmental in Lake County

Part 70 Operating Permit Renewal No.: T089-43714-00358

The Indiana Department of Environmental Management (IDEM) has received an application from Harsco Environmental located at 3236 Watling Street, MC#2-350, East Chicago, Indiana 46312 for a renewal of its Part 70 Operating Permit issued on November 16, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow Harsco Environmental to continue to operate its existing source.

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

A copy of the permit application and IDEM's preliminary findings have been sent to:

East Chicago Public Library
4925 Gladiola St.,
East Chicago, Indiana 46312

and

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

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

A copy of the application and preliminary findings is also available via IDEM’s Virtual File Cabinet (VFC). To access VFC, please go to: http://www.in.gov/idem/ and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

How can you participate in this process?

The date that this notice is posted on IDEM’s website (https://www.in.gov/idem/5474.htm) marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

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

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM’s mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number T089-43714-00358 in all correspondence.

Comments should be sent to:

Houlton Roberts  
IDEM, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
(800) 451-6027, ask for Houlton Roberts or (317) 234-4967  
Or dial directly: (317) 234-4967  
Fax: (317) 232-6749 attn: Houlton Roberts  
E-mail: hroberts@idem.IN.gov

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

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: https://www.in.gov/idem/airpermit/2358.htm; and the Citizens’ Guide to IDEM on the Internet at: https://www.in.gov/idem/6900.htm.

What will happen after IDEM makes a decision?

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

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

Josiah K. Balogun, Section Chief  
Permits Branch  
Office of Air Quality
Administrative Part 70 Operating Permit Renewal
OFFICE OF AIR QUALITY

Harsco Environmental
3236 Watling Street, MC#2-350
East Chicago, Indiana 46312

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

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

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

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

Issuance Date:

Expiration Date:
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Attachment A: Fugitive Dust Control Plan
SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(14)][326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary steel slab scarifying operation.

Source Address: 3236 Watling Street, MC#2-350, East Chicago, Indiana 46312

General Source Phone Number: 724-741-6662

SIC Code: 3398 (Metal Heat Treating)

County Location: Lake (North Township)

Source Location Status: Nonattainment for 8-hour ozone standard

Source Status: Part 70 Operating Permit Program

Major Source, under PSD and Emission Offset Rules

Major Source, Section 112 of the Clean Air Act

1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

[326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(14)]

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

Plant #2

The slab scarifier facility consists of:

(a) One (1) natural gas-fired Androfer Slab Scarfer, constructed in 1996, with a maximum capacity of 225 tons per hour and maximum heat input of 1.5 MMBtu/hr, with emissions exiting through one (1) Wheelabrator Jet III Dust Collector with an air flow rate of 95,000 acfm as control, and exhausting to stack 207.

A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)][326 IAC 2-7-5(14)]

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

Plant #2

(a) Equipment related to manufacturing activities: cutting torches. [326 6.8-1-2(a)]

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 325 IAC 20-6. [326 IAC 8-3-8]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

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

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

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

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

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

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

(a) This permit, T089-43714-00358, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.

(b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

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

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

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

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

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

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.
B.8 Certification [326 IAC 2-7-4(1)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

(1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

(2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

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

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

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

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

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

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

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

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

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

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

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance
causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

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

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

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

   Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
   Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
   Facsimile Number: 317-233-6865
   Northwest Regional Office phone: (219) 464-0233; fax: (219) 464-0553.

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

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

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

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

   (A) A description of the emergency;
(B) Any steps taken to mitigate the emissions; and
(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(6) The Permittee immediately took all reasonable steps to correct the emergency.
(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]
(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable
requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

1. The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

2. The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

3. The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

4. The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

(a) All terms and conditions of permits established prior to T089-43714-00358 and issued pursuant to permitting programs approved into the state implementation plan have been either:

1. incorporated as originally stated,

2. revised under 326 IAC 2-7-10.5, or

3. deleted under 326 IAC 2-7-10.5.

(b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).
B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

(1) That this permit contains a material mistake.

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

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

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

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

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

(2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the
(c) If the Permittee submits a timely and complete application for renewal of this permit, the source’s failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]

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

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

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

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

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

2. Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region 5
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

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

(3) Any change in emissions; and

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-7-10.5]
A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee’s premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]
(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-8590 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

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

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;
(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(c).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(d).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.7 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.8 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

(b) For existing units:
Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance to begin such monitoring. If, due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.9 Continuous Compliance Plan [326 IAC 6.8-8-1][326 IAC 6.8-8-8]

(a) Pursuant to 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the
inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.

(b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ not later than thirty (30) days after the update.

(c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

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

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

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

(a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.

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

C.12 Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]

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

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

(a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.

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

(1) initial inspection and evaluation;
(2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or

(3) any necessary follow-up actions to return operation to normal or usual manner of operation.

(c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:

(1) monitoring results;

(2) review of operation and maintenance procedures and records; and/or

(3) inspection of the control device, associated capture system, and the process.

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

(e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

(b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.

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

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 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(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.
The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

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

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

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

(AA) The date, place, as defined in this permit, and time of sampling or measurements.  
(BB) The dates analyses were performed.  
(CC) The company or entity that performed the analyses.  
(DD) The analytical techniques or methods used.  
(EE) The results of such analyses.  
(FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

(c) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:

(A) A description of the project.
(B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

(C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

(i) Baseline actual emissions;

(ii) Projected actual emissions;

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

(iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.

(d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

(1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and

(2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.17 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. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a “responsible official” as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
(b) The address for report submittal is:

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

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

(d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit “calendar year” means the twelve (12) month period from January 1 to December 31 inclusive.

(e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) 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 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and

(2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

(f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:

(1) The name, address, and telephone number of the major stationary source.

(2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.

(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
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.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.
SECTIO N D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Plant #2
The slab scarfer facility consists of:

(a) One (1) natural gas-fired Slab Scarfer, constructed in 1996, with a maximum capacity of 225 tons per hour and maximum heat input of 1.5 MMBtu/hr, with emissions exiting through one (1) Wheelabrator Jet III Dust Collector with an air flow rate of 95,000 acfm as control, and exhausting to stack 207.

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

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

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

Pursuant to Part 70 Administrative Operating Permit Renewal T089-29587-00358, issued on December 30, 2011, the Plant #2 stationary steel slab scarfer operation is limited as follows:

(a) The PM emissions shall not exceed 5.15 pounds per hour; and

(b) The PM10 emissions shall not exceed 2.86 pounds per hour.

Compliance with these limits shall limit PM emissions to less than twenty-five (25) tons per year and PM10 emissions to less than fifteen (15) tons per year and render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Particulate Emission Limitations [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the slab scarfer shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

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

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

D.1.4 Particulate Control

In order to comply with Conditions D.1.1 and D.1.2, the baghouse for PM control shall be in operation and control emissions from the slab scarfer at all times that the slab scarfer is operating.

D.1.5 Broken or Failed Bag Detection

(1) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(2) 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 current batch. 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).

(3) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ, of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Bag failure can be indicated by a significant drop in the baghouse 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.

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

D.1.6 Visible Emission Notations

(a) Visible emission notations of the slab scarfer stack (207) exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

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

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

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

(e) If abnormal emissions are observed, the Permittee shall take reasonable response steps. Section C – Response to Excursions or Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouse used in conjunction with the slab scarfer, at least once per day when the slab scarfer is in operation. When, for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 10.0 inches of water, or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and Exceedances contains the Permittee’s obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirement

(a) To document the compliance status with Condition D.1.6 - Visible Emissions Notations, the Permittee shall maintain daily records of visible emission notations of the slab scarfer stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e., the process did not operate that day).

(b) In order to document the compliance status with Condition D.1.7 - Parametric Monitoring, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the process when venting to the atmosphere. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of pressure drop reading (i.e., the process did not operate that day).

(c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

<table>
<thead>
<tr>
<th>Plant #2</th>
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<tr>
<td>(a) Equipment related to manufacturing activities: cutting torches. [326 6.8-1-2(a)]</td>
</tr>
<tr>
<td>(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 325 IAC 20-6. [326 IAC 8-3-8]</td>
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(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

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

D.2.1 Particulate Emission Limitations [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the torch cutting shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

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

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), the Permittee shall not operate a cold cleaning degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

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

D.2.4 Record Keeping Requirements

(a) To document the compliance status with Condition D.2.2, the Permittee shall maintain the following records for each purchase of solvent used in the cold cleaner degreasing operation. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

(1) The name and address of the solvent supplier.

(2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).

(3) The type of solvent purchased.

(4) The total volume of solvent purchased.

(5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

(b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Harsco Environmental
Source Address: 3236 Watling Street, MC#2-350, East Chicago, Indiana 46312
Part 70 Permit No.: T089-43714-00358

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

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) __________________________________________________________

☐ Report (specify) ______________________________________________________________

☐ Notification (specify) _________________________________________________________

☐ Affidavit (specify) _____________________________________________________________

☐ Other (specify) _______________________________________________________________

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:
PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Harsco Environmental
Source Address: 3236 Watling Street, MC#2-350, East Chicago, Indiana 46312
Part 70 Permit No.: T089-43714-00358

This form consists of 2 pages
Page 1 of 2

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

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:
If any of the following are not applicable, mark N/A

| Date/Time Emergency started: |          |
| Date/Time Emergency was corrected: |          |
| Was the facility being properly operated at the time of the emergency? | Y | N |
| Type of Pollutants Emitted: TSP, PM-10, SO₂, VOC, NOₓ, 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: _________________________________________________________
This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B - Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C - General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

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Form Completed by: _______________________________________________________
Title / Position: __________________________________________________________
Date: ___________________________________________________________________
Phone: _________________________________________________________________
Harsco Environmental

A Contractor of Cleveland Cliffs (former ArcelorMittal USA, Inc.)

- Indiana Harbor East

3210 Watling Street, MS #2-350
East Chicago, Indiana 46312

Part 70 Operating Permit No. T089-37046-00358
Issue Date: November 16, 2016 - Expiration Date: November 16, 2021

Fugitive Dust Control Plan

May 3, 2021

Prepared by Valparaiso Safety & Environmental Consultants, Inc.
HARSCO METALS AMERICAS, A DIVISION OF HARSCO CORPORATION:
PLANT #2

HARSCO METALS AMERICAS, A DIVISION OF HARSCO CORPORATION, IS A SUBCONTRACTOR TO CLEVELAND CLIFFS (FORMER ARCELORMITTAL USA, INC.). ALL OF THE FUGITIVE DUST SOURCES AROUND THE HARSCO METALS AMERICAS FACILITY THAT ARE REQUIRED TO HAVE PERMITS ARE OWNED AND UNDER THE EXCLUSIVE CONTROL OF CLEVELAND CLIFFS (FORMER ARCELORMITTAL USA, INC.)., WHOSE CONTROL MEASURES AND OPERATING PROCEDURES MINIMIZE EMISSIONS AND PREVENT OFF-PROPERTY TRANSPORT. ALL UNPAVED/PAVED ROADS AND PARKING LOTS AROUND THE HARSCO METALS AMERICAS FACILITY ARE OWNED BY AND UNDER THE EXCLUSIVE CONTROL OF CLEVELAND CLIFFS (FORMER ARCELORMITTAL USA, INC.). THERE ARE NO OTHER FUGITIVE DUST SOURCE CATEGORIES AT THE HARSCO METALS AMERICAS FACILITY.
SECTION 1 – INTRODUCTION

Purpose

Developed at the request of the Indiana Department Of Environmental Management (IDEM), this plan describes all of the fugitive dust sources and the technologically feasible and economically reasonable control measures and operating procedures that can be used to minimize dust at HARSCO METALS AMERICAS. Our employees and contractors will implement these measures to avoid off-property transport and to ensure the associated visible emissions do not exceed 20% opacity or create a nuisance problem.

Fugitive Dust and Its Health Effects

Fugitive dust is a health concern because it can contain particles that may be trapped in the nose or upper respiratory system. Other particles can bring about both chronic and acute health effects, such as persistent coughs, asthma, aggravation of bronchitis, premature death, or heart and lung disease. Particularly sensitive groups that appear to be at greater risk include the elderly, individuals with cardiopulmonary disease (such as asthma), and children. In addition to health complications, material in fugitive dust can cause impaired vision, physical discomfort and/or property damage.

References

Control of fugitive dust is regulated by the Indiana Department of Environmental Management (IDEM)

The applicable state and/or county emission limitation guidelines are listed below:

- Air Permitting Rules 326 IAC 6-4 and 326 IAC 6-5 require fugitive dust to be controlled as needed to prevent dust from visibly crossing property lines.
Scope

The most common examples of fugitive dust emissions are those associated with storage piles or unpaved roads caused by either wind or human activities, such as vehicle traffic. Construction, demolition, dismantling, and renovation activities, unpaved roadways, and disturbed areas are other sources of fugitive dust emissions. Importantly, regardless of whether or not a project requires a permit, IDEM requires that sources emitting fugitive dust must use applicable control measures to minimize such emissions as much as possible.

This document is a guide for identifying and controlling sources of fugitive dust emissions at HARSCO METALS AMERICAS. Section 2 defines and describes these fugitive sources, Section 3 describes the appropriate control measures to minimize those emissions, Section 4 outlines responsibilities of involved personnel and Section 5 concludes.
SECTION 2 – SOURCE CATEGORIES

General

This section defines and describes the fugitive dust emissions sources at HARSCO METALS AMERICAS. Fugitive emissions are those that cannot be reasonably collected and passed through a stack or other type of opening. When they are caused by sporadic or widespread activities due to wind or vehicle travel, it can often be difficult to quantify such emissions. Fugitive dust emissions from unpaved roads can only be a rough estimate as it is difficult to track the number and types of vehicles on these roads, owned mostly by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. Additionally, there are no specific emission factors established for the various types of vehicles or to account for all of the road surface constituents.

Source Categories

• Emissions from Building
• Storage Piles
• Unpaved Road Travel
• Paved Road Dust Entrainment
• Street Cleaning/Sweeping

Emissions from Building
The HARSCO METALS AMERICAS building/facility is owned and on the property of Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. Dust generated by the scarfing process is collected in a baghouse. Any other dust is contained within the building itself by keeping all building opening, such as overhead doors, closed while the process is in operation.

Storage Piles
Temporary storage piles contain steel drippings from the scarfing process are stored outside temporarily throughout the year. This material is owned by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East to be used in the manufacturing of steel by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. This material has relatively high moisture content and will not contribute in any significant manner to Fugitive Emissions.

Unpaved Road Travel
There is one unpaved road adjacent to the HARSCO METALS AMERICAS building that is used exclusively by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East vehicles and not HARSCO METALS AMERICAS.
**Paved Road Dust Entrainment**
Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East owns all of the paved roads around the HARSCO METALS AMERICAS facility. All of the paved roads are under the exclusive control of Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. Dust is generated from this category when various materials are dragged out or spilled from vehicles under the exclusive control of Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East then vehicles grind and lift dried particles off these paved surfaces and into the air.

**Street Cleaning/Sweeping**
Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East owns all of the paved roads around the HARSCO METALS AMERICAS facility. All of the paved roads are under the exclusive control of Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. Mechanical street sweepers are used on a regular basis at Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. They clean the debris from paved roadways to maintain the overall appearance and also as a best management practice for storm water pollution control. However, in dry conditions, the sweeping equipment can create some minor, localized dust emissions. Wetting the paved roadways with water is a practice used by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East to minimize dust emissions.
SECTION 3 – CONTROL MEASURES

General

Abatement and control measures, such as watering and street sweeping, are used to minimize dust from several types of sources at Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. All of these methods are under the exclusive control of Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East. The HARSCO METALS AMERICAS facility uses best management practice to control and minimize dust released from their building.

Existing Dust Controls

The best management practice used to control dust at the HARSCO METALS AMERICAS facility is to close overhead doors to the facility during scarfing operations and maintain their closure during the duration of the process activity.

Recommended Control Measures

This section identifies the most common, available control measures recommended for implementation, but should not be relied upon as a comprehensive list or the only list. Control measures are often considered best management practices.

Emissions from Building

- Keeping building opening, such as overhead doors, closed while the process is in operation
- Maintaining the Bag house that collect dust generated in the scarfing process
- Maintaining process equipment so as to minimize fugitive dust emissions

Storage Piles

- Use of wind breaks
- Restrict speed limits
- Minimize the slope of the upwind face of the pile, confining as much pile activity as possible to the downwind side of the pile
- Limit the pile height
Unpaved Roads/Areas

- Unpaved roads are used exclusively by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East vehicles and not HARSCO METALS AMERICAS.
- The parking area directly outside of the HARSCO METALS AMERICAS Maintenance/Office Building is unpaved and three (3) HARSCO METALS AMERICAS park their private cars there on a daily basis. Due to the speed restrictions imposed on the Mill property, these vehicles do not contribute in a significant way to road generated dust.

Paved Road Dust Entrainment

- Paved roads are exclusively maintained and cleaned by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East vehicles and not HARSCO METALS AMERICAS.
- Restrict speed limits controlled by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East.

Street Cleaning/Sweeping

- Use water while equipment is operated, controlled by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East.
- Clean streets on a regular schedule to avoid build up, controlled by Cleveland Cliffs (former ArcelorMittal USA, Inc.)-Indiana Harbor East.
SECTION 4 – RESPONSIBILITIES

Regardless of whether or not a permit is required, sources potentially emitting fugitive dust are required to minimize such emissions so that nuisance conditions are not created, visible emissions are not transported off property, and opacity limits are not exceeded.

If a fugitive dust event exceeds the 20% opacity limit, results in off-property transport or violates the nuisance regulation, actions will be taken to correct the problem and return to compliance as quickly as possible.

The following are steps that have been and will continue to be taken if a fugitive dust event is observed:

- Stop the activity immediately
- Implement more control measures to minimize the fugitive dust non-compliance event
SECTION 5 – CONCLUSION

This plan should be referred to prior to any future project initiation to provide additional forethought in the development and implementation of a project to avoid off-property transport and to ensure the associated visible emissions do not exceed 20% opacity or create a nuisance problem. Personnel involved in activities that produce fugitive dust are responsible for implementing the applicable control measures and operating procedures to minimize dust emissions to the greatest extent possible. Such persons are responsible for complying with all applicable county, state and federal air regulations and will appropriately burden the responsibility of any associated compliance actions if taken by the regulatory authorities.

Personnel will continue to be made aware of the local and state regulations through a variety of ways, primarily by being provided access to this plan, as well as the Fugitive Dust Controls and Permit Requirements. HARSCO METALS AMERICAS will continue providing appropriate response when reviewing future projects so that personnel will be made aware of fugitive dust issues and requirements for control measures.
Indiana Department of Environmental Management
Office of Air Quality

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

Source Description and Location

<table>
<thead>
<tr>
<th>Source Name:</th>
<th>Harsco Environmental</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Location:</td>
<td>3236 Watling Street, MC#2-350, East Chicago, Indiana 46312</td>
</tr>
<tr>
<td>County:</td>
<td>Lake (North Township)</td>
</tr>
<tr>
<td>SIC Code:</td>
<td>3398 (Metal Heat Treating)</td>
</tr>
<tr>
<td>Permit Renewal No.:</td>
<td>T089-43714-00358</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Houlton Roberts</td>
</tr>
</tbody>
</table>

On February 1, 2021, Harsco Environmental submitted an application to the Office of Air Quality (OAQ) requesting to renew its operating permit. OAQ has reviewed the operating permit renewal application from Harsco Environmental relating to the operation of a steel slab scarfing operation. Harsco Environmental was issued its second Part 70 Operating Permit Renewal (T089-37046-00358) on November 16, 2016.

Source Definition

Cleveland-Cliffs Steel LLC., an integrated steel mill, consists of a source with on-site contractors.

(a) Cleveland-Cliffs Steel LLC., Plant ID# 089-00316, the primary operation, is located at 3210 Watling Street, East Chicago, Indiana; and

(b) Harsco Environmental, Plant ID# 089-00358, the supporting operation, is located at 3236 Watling Street, MC#2-350, East Chicago, Indiana and consists of the following plant:

(1) Harsco Environmental

Harsco Environmental is under the common control of Cleveland-Cliffs Steel LLC. These plants are considered one (1) major source, as defined by 326 IAC 2-7-1(22), based on this contractual control. Therefore, the term “source” in the Part 70 documents refers to both Cleveland-Cliffs Steel LLC. and Harsco Environmental as one (1) major source.

Separate Part 70 permits will be issued to Cleveland-Cliffs Steel LLC. and Harsco Environmental solely for administrative purposes.

This determination was initially made under Part 70 No. 089-6583-00358, issued on June 1, 2006.

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T089-37046-00358 on November 16, 2016. There have been no subsequent approvals issued.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:
Plant #2
The slab scarfer facility consists of:

(a) One (1) natural gas-fired Androfer Slab Scarfer, constructed in 1996, with a maximum capacity of 225 tons per hour and maximum heat input of 1.5 MMBtu/hr, with emissions exiting through one (1) Wheelabrator Jet III Dust Collector with an air flow rate of 95,000 acfm as control, and exhausting to stack 207.

### Emission Units and Pollution Control Equipment Removed From the Source

The source has removed the following emission units:

1. The briquetting facility, maximum processing capacity of 60 tons/hr of solid waste materials, installed in 1993, consists of:
   - (a) one (1) raw material storage pile and blending area;
   - (b) one (1) 37 MMBtu/hr natural gas-fired rotary drum dryer exhausting through a multi-tube cyclone and baghouse with an air flow rate of 36,000 acfm, with emissions controlled by baghouse and exiting through stack 203 into the atmosphere;
   - (c) one (1) blend silo exhausting through a bin vent into the building;
   - (d) one (1) bulk sack and pneumatic truck unloading area, covered conveyors, and four (4) material silos, each with a bin vent and exhausting into the building;
   - (e) two (2) pug mills, one (1) molasses storage vessel, one (1) briquette press, and one (1) vibrating screen exhausting into the building; and
   - (f) one (1) indoor storage pile.

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

### Insignificant Activities

The source also consists of the following insignificant activities:

Plant #2

(a) Equipment related to manufacturing activities: cutting torches. [326 6.8-1-2(a)]

(b) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 325 IAC 20-6. [326 IAC 8-3-8]

(c) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]

### Enforcement Issue

There are no enforcement actions pending.

### Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.
County Attainment Status

The source is located in Lake County, North Township.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Designation</th>
</tr>
</thead>
<tbody>
<tr>
<td>SO₂</td>
<td>Better than national standards.</td>
</tr>
<tr>
<td>CO</td>
<td>Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.</td>
</tr>
<tr>
<td>O₃</td>
<td>Serious nonattainment effective September 23, 2019, for the 2008 8-hour ozone standard.</td>
</tr>
<tr>
<td>O₃</td>
<td>Marginal nonattainment effective August 3, 2018, for the 2015 8-hour ozone standard for Calumet Township, Hobart Township, North Township, Ross Township, and St. John Township. Unclassifiable or attainment effective August 3, 2018, for the 2015 8-hour ozone standard for the remainder of the county.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective January 28, 2019, for the 2012 annual PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₂.₅</td>
<td>Unclassifiable or attainment effective December 13, 2009, for the 2006 24-hour PM₂.₅ standard.</td>
</tr>
<tr>
<td>PM₁₀</td>
<td>Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable or attainment effective November 15, 1990, for the remainder of Lake County.</td>
</tr>
<tr>
<td>NO₂</td>
<td>Unclassifiable or attainment effective January 29, 2012, for the 2010 NO₂ standard.</td>
</tr>
<tr>
<td>Pb</td>
<td>Unclassifiable or attainment effective December 31, 2011, for the 2008 lead standard.</td>
</tr>
</tbody>
</table>

(a) Ozone Standards
U.S. EPA, in the Federal Register Notice 84 FR 44238 dated August 23, 2019, designated Lake County as serious nonattainment for the 2008 8-hour ozone standard effective September 23, 2019. A rulemaking is in process to revise the 326 IAC 1-4 attainment status designations for the 2008 8-hour ozone standard for Lake and Porter County. The OAQ will rely on the serious nonattainment designation under 40 CFR 81.315 until the rulemaking for 326 IAC 1-4 is effective. Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NOx emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.

(b) PM₂.₅
Lake County has been classified as attainment for PM₂.₅. Therefore, direct PM₂.₅, SO₂, and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants
Lake County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this source is classified as an integrated steel mill, it is considered one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B). Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

The fugitive emissions of hazardous air pollutants (HAP) are counted toward the determination of Part 70 Permit applicability and source status under Section 112 of the Clean Air Act (CAA).
Greenhouse Gas (GHG) Emissions

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

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

<table>
<thead>
<tr>
<th>Unrestricted Potential Emissions (ton/year)</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM¹</td>
</tr>
<tr>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>Plant #2 Slab Scarfer</td>
</tr>
<tr>
<td>Plant #2 Cutting torches</td>
</tr>
<tr>
<td>Plant #2 Scarfer Combustion</td>
</tr>
<tr>
<td>Total PTE of Entire Source Including Fugitives*</td>
</tr>
<tr>
<td>Cleveland-Cliffs Steel LLC</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂₅ listed is direct PM₂₅.
*Fugitive HAP emissions are always included in the source-wide emissions.

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

(a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM₁₀ and PM₂₅ is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

The potential to emit (as defined in 326 IAC 2-7-1(30)) of NOₓ VOC is equal to or greater than fifty (50) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Operating Permit Renewal.

(b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(30)) of a
The combination of HAPs is equal to or greater than twenty-five (25) tons per year. The source will be issued a Part 70 Operating Permit Renewal.

**Part 70 Permit Conditions**

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

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

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

<table>
<thead>
<tr>
<th>Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)</th>
<th>PM¹</th>
<th>PM₁₀¹</th>
<th>PM₂₅¹ ²</th>
<th>SO₂</th>
<th>NOₓ</th>
<th>VÒC</th>
<th>CO</th>
<th>Total HAPs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant #2 Slab Scarfer</td>
<td>22.56</td>
<td>12.53</td>
<td>4.93</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plant #2 Cutting torches</td>
<td>2.42</td>
<td>2.42</td>
<td>2.42</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Plant #2 Scarfer Combustion</td>
<td>0.01</td>
<td>0.05</td>
<td>0.05</td>
<td>3.94E-03</td>
<td>0.66</td>
<td>0.04</td>
<td>0.55</td>
<td>0.01</td>
</tr>
<tr>
<td><strong>Total PTE of Entire Source Including Fugitives</strong></td>
<td><strong>24.99</strong></td>
<td><strong>15.00</strong></td>
<td><strong>7.39</strong></td>
<td><strong>3.94E-03</strong></td>
<td><strong>0.66</strong></td>
<td><strong>0.04</strong></td>
<td><strong>0.55</strong></td>
<td><strong>0.01</strong></td>
</tr>
<tr>
<td>Cleveland-Cliffs Steel LLC</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;100</td>
<td>&gt;25</td>
</tr>
<tr>
<td>Title V Major Source Thresholds</td>
<td>NA</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>50</td>
<td>50</td>
<td>100</td>
<td>25</td>
</tr>
<tr>
<td>PSD Major Source Thresholds</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>100</td>
<td>--</td>
</tr>
<tr>
<td>Emission Offset Major Source Thresholds</td>
<td>---</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td>50</td>
<td>50</td>
<td>NA</td>
<td>--</td>
</tr>
</tbody>
</table>

¹Under the Part 70 Permit program (40 CFR 70), PM₁₀ and PM₂₅, not particulate matter (PM), are each considered as a “regulated air pollutant.”
²PM₂₅ listed is direct PM₂₅.
*Fugitive HAP emissions are always included in the source-wide emissions.

Appendix A of this TSD reflects the detailed potential to emit of the entire source after issuance.

(a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

(b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because NOₓ and VOC, each a nonattainment regulated pollutant, is emitted at a rate of 50 tons per year or more.

(c) This source is a major source of HAP, as defined in 40 CFR 63.2, because HAP emissions are equal to or greater than ten (10) tons per year for a single HAP and equal to or greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
Federal Rule Applicability

Federal rule applicability for this source has been reviewed as follows:

**New Source Performance Standards (NSPS):**

(a) The requirements of the New Source Performance Standard for Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984 40 CFR 60, Subpart Kb and 326 IAC 12, are not included in the permit for the insignificant petroleum liquid dispensing facility, because although they store volatile organic liquids, pursuant to 40 CFR 60.110b, the petroleum liquid dispensing facility does not have a capacity greater than or equal to 75 cubic meters.

(b) There are no New Source Performance Standards (40 CFR Part 60) and 326 IAC 12 included in the permit.

**National Emission Standards for Hazardous Air Pollutants (NESHAP):**

(a) There are no National Emission Standards for Hazardous Air Pollutants under 40 CFR 63, 326 IAC 14 and 326 IAC 20 included in the permit.

**Compliance Assurance Monitoring (CAM):**

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

1. has a potential to emit before controls equal to or greater than the major source threshold for the regulated pollutant involved;
2. is subject to an emission limitation or standard for that pollutant (or a surrogate thereof); and
3. uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

(b) Pursuant to 40 CFR 64.2(b)(1)(i), emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act are exempt from the requirements of CAM. Therefore, an evaluation was not conducted for any emission limitations or standards proposed after November 15, 1990 pursuant to a NSPS or NESHAP under Section 111 or 112 of the Clean Air Act.

The following table is used to identify the applicability of CAM to each emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

<table>
<thead>
<tr>
<th>Emission Unit/Pollutant</th>
<th>Control Device</th>
<th>Applicable Emission Limitation</th>
<th>Uncontrolled PTE (tons/year)</th>
<th>Controlled PTE (tons/year)</th>
<th>CAM Applicable (Y/N)</th>
<th>Large Unit (Y/N)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slab Scarfing PM/PM10/PM2.5</td>
<td>Baghouse</td>
<td>326 IAC 6.8-1-2(a)</td>
<td>98.55¹</td>
<td>4.93</td>
<td>No</td>
<td>N</td>
</tr>
</tbody>
</table>

¹ The value 98.55 represents the PTE for the Slab Scarfing PM/PM10/PM2.5 emission unit.
Under the Part 70 Permit program (40 CFR 70), PM is not a regulated air pollutant. Uncontrolled PTE (tpy) and controlled PTE (tpy) are evaluated against the Major Source Threshold for each pollutant. Major Source Threshold for regulated air pollutants (PM10, PM2.5, SO2, and CO) is 100 tpy, for NOx and VOC 50 tpy, for a single HAP ten (10) tpy, and for total HAPs twenty-five (25) tpy.

N CAM does not apply for PM because the uncontrolled PTE of PM is less than the major source threshold.

PM* For limitations under 326 IAC 6-3-2, 326 IAC 6.5, and 326 IAC 6.8, IDEM OAQ uses PM as a surrogate for the regulated air pollutant PM10. Therefore, uncontrolled PTE and controlled PTE reflect the emissions of the regulated air pollutant PM10.

Emission units without air pollution controls are not subject to CAM. Therefore, they are not listed.

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

State rule applicability for this source has been reviewed as follows:

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

326 IAC 2-2 (PSD)
This source, located in Lake County, is one of the 28 listed source categories and is an on-site contractor of Cleveland-Cliffs Steel LLC. These plants are considered one source due to contractual control. Cleveland-Cliffs Steel LLC has the potential to emit of at least one regulated attainment pollutant greater than 100 tons per year. Therefore, this source is a major source pursuant to 326 IAC 2-2 (PSD).

1993 Modification
(1) Pursuant to Part 70 Administrative Operating Permit Renewal T089-29587-00358, issued on December 30, 2011, the Plant #2 stationary steel slab scarfer operation is limited as follows:

(a) The PM emissions shall not exceed 5.15 pounds per hour; and

(b) The PM10 emissions shall not exceed 2.86 pounds per hour.

Compliance with these limits shall limit PM emissions to less than twenty-five (25) tons per year and PM10 emissions to less than fifteen (15) tons per year and render the requirements of 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-3 (Emission Offset)
This source, located in Lake County, is one of the 28 listed source categories and is a supporting operation as an onsite contractor to Cleveland-Cliffs Steel LLC. These plants are considered one source due to contractual control. Cleveland-Cliffs Steel LLC has the potential to emit NOx and VOC emissions greater than fifty (50) tons per year. Therefore, this source is a major source pursuant to 326 IAC 2-3 (Emission Offset).

326 IAC 2-6 (Emission Reporting)
This source is subject to the requirements of 326 IAC 2-6 (Emission Reporting), since it is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program. Pursuant to 326 IAC 2-6-3(a)(2), the Permittee shall submit triennially, by July 1, an emission statement covering the previous calendar year in accordance with the compliance schedule in 326 IAC 2-6-3. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
326 IAC 2-7-6(5) (Annual Compliance Certification)
The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

326 IAC 5-1 (Opacity Limitations)
This source is subject to the opacity limitations specified in 326 IAC 5-1-2(B), and (C).

326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
This source is not subject to the requirements of 326 IAC 6-5, because the source has potential fugitive particulate emissions of less than twenty-five (25) tons per year.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)
This source (located in Lake County) is not one of the sources specifically listed in 326 IAC 6.8-4, 326 IAC 6.8-5, or 326 IAC 6.8-8 through 326 IAC 6.8-11. The source-wide PTE of PM is 10 tons per year or more. Therefore, this source is subject to the requirements of 326 IAC 6.8-1-2 because the source-wide actual emissions of PM can be 10 tons per year or more.

326 IAC 6.8-8 (Particulate Matter Limitations for Lake County)
This source is subject to 326 IAC 6.8-8 because the source has facilities with total uncontrolled PM$_{10}$ emissions of ten (10) tons per year or more. Pursuant to 326 IAC 6.8-8-1(18), the Permittee shall submit to IDEM, OAQ and maintain at the source a copy of a Continuous Compliance Plan (CCP).

326 IAC 6.8-10 (Particulate Matter Limitations for Lake County)
The source is subject to the requirements of 326 IAC 6.8-10 because it is located in Lake County and has the potential to emit five (5) tons per year or more of fugitive particulate matter into the atmosphere.

326 IAC 6.8-11 (Particulate Matter Limitations for Lake County)
Pursuant to 326 IAC 6.8-11-1, the Permittee is subject to 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures) and shall comply with 326 IAC 6.8-11-4, 326 IAC 6.8-11-5 and 326 IAC 6.8-11-6 (formerly 326 IAC 6-1-11.2(h), (l), (k), (l), (m), (o), (p) and (q) (Lake County Particulate Matter Contingency Measures) as required.

State Rule Applicability – Individual Facilities

State rule applicability has been reviewed as follows:

Slab Scarfing Facility

326 IAC 6.8 (PM Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the slab scarfer shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Torch Cutting

326 IAC 6.8 (PM Limitations for Lake County)
Pursuant to 326 IAC 6.8-1-2(a), the particulate matter emissions from the torch cutting shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).
Degreasing

326 IAC 8-3-2 (Cold cleaner degreaser control equipment and operating requirements)
Pursuant to 326 IAC 8-3-1(a), the degreasing operations are not subject to 326 IAC 8-3-2, because the degreasers do not use solvents that contain one (1) or more volatile organic compounds (VOC).

326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers)
Pursuant to 326 IAC 8-3-8(a), the degreasing operations are subject to the material requirements of 326 IAC 8-3-8 because it is a degreaser that was constructed before January 1, 2015 and are in Lake County.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)
Pursuant to 326 IAC 8-9-1(b), the Permittee is subject to the reporting and record keeping provisions of 326 IAC 8-9-6(a) and 326 IAC 8-9-6(b) and are exempt from all other provisions of 326 IAC 8-9.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
Even though, the degreasing operation was constructed after January 1, 1980, it is not subject to the requirements of 326 IAC 8-1-6 because its unlimited VOC potential emissions are less than twenty-five (25) tons per year.

Compliance Determination and Monitoring Requirements

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

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

(a) The Compliance Determination Requirements applicable to this source are as follows:

Testing Requirements:

IDEM OAQ has determined that testing of the slab scarfer baghouse is not required at this time to determine compliance with the PM emission limits. IDEM has the authority to require testing at a later time if necessary to demonstrate compliance with any applicable requirement.

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

<table>
<thead>
<tr>
<th>Emission Unit and Control Device</th>
<th>Type of Parametric Monitoring</th>
<th>Frequency</th>
<th>Range or Specification</th>
</tr>
</thead>
<tbody>
<tr>
<td>Slab Scarfer/Baghouse</td>
<td>Water Pressure Drop</td>
<td>Daily</td>
<td>3.0 to 10.0 Inches</td>
</tr>
<tr>
<td></td>
<td>Visible Emission Notations</td>
<td></td>
<td>Normal to Abnormal</td>
</tr>
</tbody>
</table>

These monitoring conditions are necessary because the the baghouse for the slab scarfer must operate properly to assure compliance with 326 IAC 6.8-1-2 (Particulate Emission Limitations) and 326 IAC 2-2 (PSD).
Proposed Changes

As part of this permit approval, the permit may contain new or different permit conditions and some conditions from previously issued permits/approvals may have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes.

The following changes were made to conditions contained previously issued permits/approvals (these changes may include Title I changes):

1. Plant #1: Harsco Metals ECR LLC, wholly owned by Harsco Corporation, has ceased operations and the site is permanently closed. The limits to the Plant #1 natural gas-fired rotary drum dryer have been removed from the source as follows:

   Pursuant to construction permit CP089-3264-00358, issued on October 19, 1993, and as revised by Part 70 Operating Permit Renewal No. T089-29587-00358, the Plant #1 natural gas-fired rotary drum dryer shall be limited as follows:

   a. The PM Emissions shall not exceed 4.91 pounds per hour.
   b. The PM10 Emissions shall not exceed 2.47 pounds per hour.

Conclusion and Recommendation

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 February 1, 2021.

The operation of this steel slab scarfing operation shall be subject to the conditions of the attached proposed Administrative Part 70 Operating Permit Renewal No. 089-43714-00358.

The staff recommends to the Commissioner that the Administrative Part 70 Operating Permit Renewal be approved.

IDEM Contact

(a) If you have any questions regarding this permit, please contact Houlton Roberts, Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or by telephone at (317) 234-4967 or (800) 451-6027, and ask for Houlton Roberts or (317) 234-4967.

(b) A copy of the findings is available on the Internet at: [http://www.in.gov/ai/appfiles/idem-caats/](http://www.in.gov/ai/appfiles/idem-caats/)

(c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: [https://www.in.gov/idem/airpermit/2358.htm](https://www.in.gov/idem/airpermit/2358.htm); and the Citizens' Guide to IDEM on the Internet at: [https://www.in.gov/idem/6900.htm](https://www.in.gov/idem/6900.htm).
### Source Wide Emissions Summary

**Company Name:** Harco Environmental  
**Address:** 3236 Watling Street, MC#2-350, East Chicago, IN 46312  
**Part 70 Permit No.:** T089-43714-00358  
**Permit Reviewer:** Houlton Roberts

#### Process ID/facility

<table>
<thead>
<tr>
<th>Process ID/facility</th>
<th>Uncontrolled PTE (tons/yr)</th>
<th>Limited PTE (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PM</td>
<td>PM$_{10}$</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>----</td>
<td>-----------</td>
</tr>
<tr>
<td>Plant #2 Slab Scarfer</td>
<td>98.55</td>
<td>98.55</td>
</tr>
<tr>
<td>Plant #2 Cutting torches</td>
<td>2.42</td>
<td>2.42</td>
</tr>
<tr>
<td>Plant #2 Scarfer Combustion</td>
<td>0.01</td>
<td>0.05</td>
</tr>
</tbody>
</table>

**Source Total Unlimited PTE:**  

| Plant #2 Slab Scarfer         | 22.56 | 12.53 | 4.93 | - | - | - | - | - | - | - | 24.99 | 15.00 | 7.39 | 3.94E-03 | 0.66 | 0.04 | 0.55 | 0.03 | 0.01 | 0.01 |
| Plant #2 Cutting torches      | 2.42 | 2.42 | 2.42 | - | - | - | - | 0.01 | 0.01 | Manganese |
| Plant #2 Scarfer Combustion   | 0.01 | 0.05 | 0.05 | 3.94E-03 | 0.66 | 0.04 | 0.55 | 0.01 | 0.01 | Hexane |

**Source Total Limited PTE:**

**Notes**

2 Plant #2 Slab Scarfer is limited as specified in Part 70 Operating Permit Renewal T089-37046-00358
Appendix A: Emissions Calculations
Potential Particulate Matter Emissions from Plant #2 Scarfing Operation

Company Name: Harsco Environmental
Address: 3236 Watling Street, MC#2-350, East Chicago, IN 46312
Part 70 Permit No.: T089-43714-00358
Permit Reviewer: Houlton Roberts

<table>
<thead>
<tr>
<th>Operation/Location</th>
<th>Emission Factor* (lbs/ton)</th>
<th>Max. Quantity of Material (tons/hr)</th>
<th>Max. Uncontrolled PM Emissions (tons/yr)</th>
<th>Baghouse Collection Efficiency (%)</th>
<th>Max. Controlled PM Emissions (lbs/hr)</th>
<th>Max. Controlled PM Emissions (tons/yr)</th>
<th>326 IAC 6.8-1-2(a) Limit** (tons/yr)</th>
<th>PSD Minor PM Limit (tons/yr)</th>
<th>PSD Minor PM(_{10}) Limit (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant #2 Slab Scarfer 3236 Watling St.</td>
<td>0.1</td>
<td>225</td>
<td>98.55</td>
<td>95.0%</td>
<td>1.13</td>
<td>4.93</td>
<td>40.55</td>
<td>22.56</td>
<td>12.53</td>
</tr>
</tbody>
</table>

Methodology:
*Emission Factor obtained from AP 42, Ch 12.5, Table 12.5-1
** 326 IAC 6.8-1-2(a) emission limit of 0.03 gr/scf converted to tons/yr at design flow rate of 36,000 acfm
Uncontrolled Emissions (tons/yr) = Max. Quantity of Material (tons/hr)*8760 (hrs/yr)*Emission Factor (lbs/ton)/2000 (lbs/ton)
Controlled Emissions (tons/yr) = Uncontrolled Emissions (tons/yr)* (1-Control Efficiency)
Appendix A: Emissions Calculations
Plant #2 Scarfer Natural Gas Combustion Only
MM BTU/HR <100

Company Name: Harsco Environmental
Address: 3236 Watling Street, MC#2-350, East Chicago, IN 46312
Part 70 Permit No.: T089-43714-00358
Permit Reviewer: Houlton Roberts

Heat Input Capacity

<table>
<thead>
<tr>
<th>MMBtu/hr</th>
<th>HHV mmBtu/mmscf</th>
<th>Potential Throughput MMCF/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.5</td>
<td>1000</td>
<td>13.1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PM*</th>
<th>PM10*</th>
<th>SO2</th>
<th>NOx</th>
<th>VOC</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMCF</td>
<td>1.9</td>
<td>7.6</td>
<td>0.6</td>
<td>100</td>
<td>5.5</td>
<td>84</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>0.01</td>
<td>0.05</td>
<td>3.94E-03</td>
<td>0.66</td>
<td>0.04</td>
<td>0.55</td>
</tr>
</tbody>
</table>

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page HAPs emissions calculations.
# Appendix A: Emissions Calculations

## Plant #2 Scarfer Natural Gas Combustion Only

**MM BTU/HR <100**

### HAPs Emissions

<table>
<thead>
<tr>
<th>Company Name:</th>
<th>Harsco Environmental</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>3236 Watling Street, East Chicago, IN 46312</td>
</tr>
<tr>
<td>Part 70 Permit No.:</td>
<td>T089-43714-00358</td>
</tr>
<tr>
<td>Permit Reviewer:</td>
<td>Houlton Roberts</td>
</tr>
</tbody>
</table>

**Benzene**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1E-03</td>
<td>1.38E-05</td>
</tr>
</tbody>
</table>

**Dichlorobenzene**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2E-03</td>
<td>7.88E-06</td>
</tr>
</tbody>
</table>

**Formaldehyde**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.5E-02</td>
<td>4.93E-04</td>
</tr>
</tbody>
</table>

**Hexane**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.8E+00</td>
<td>1.18E-02</td>
</tr>
</tbody>
</table>

**Toluene**

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.4E-03</td>
<td>2.23E-05</td>
</tr>
</tbody>
</table>

**Total Organic HAP =** 1.236E-02

### HAPs - Metals

<table>
<thead>
<tr>
<th>Lead</th>
<th>Cadmium</th>
<th>Chromium</th>
<th>Manganese</th>
<th>Nickel</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0E-04</td>
<td>1.1E-03</td>
<td>1.4E-03</td>
<td>3.8E-04</td>
<td>2.1E-03</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.29E-06</td>
<td>7.23E-06</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>9.20E-06</td>
<td>2.50E-06</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Factor in lb/MMcf</th>
<th>Potential Emission in tons/yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.38E-05</td>
<td>1.38E-05</td>
</tr>
</tbody>
</table>

**Total Metal HAP =** 3.600E-05

**Total HAP =** 1.240E-02

Methodology is the same as page 7.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

See Page 11 for Greenhouse Gas calculations.
**Appendix A: Emissions Calculations**

**Plant #2 Scarfer Natural Gas Combustion Only**

MM BTU/HR <100

**Greenhouse Gas Emissions**

Company Name: Harsco Environmental
Address: 3236 Watling Street, East Chicago, IN 46312
Part 70 Permit No.: T089-43714-00358
Permit Reviewer: Houlton Roberts

<table>
<thead>
<tr>
<th>Greenhouse Gas</th>
<th>CO2</th>
<th>CH4</th>
<th>N2O</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Factor in lb/MMcf</td>
<td>120000</td>
<td>2.3</td>
<td>2.2</td>
</tr>
<tr>
<td>Potential Emission in tons/yr</td>
<td>788.40</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Summed Potential Emissions in tons/yr</td>
<td>788.43</td>
<td></td>
<td></td>
</tr>
<tr>
<td>CO2e Total in tons/yr</td>
<td>793.20</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64. Emission Factors are from AP 42, Table 1.4-2 SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03. Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) +
## Appendix A: Emissions Calculations

### Particulate Matter Emissions from Manual Torch Cutting

**Company Name:** Harsco Environmental  
**Address City IN Zip:** 3236 Watling Street, MC#2-350, East Chicago, IN 46312  
**Part 70 Permit No.:** T089-43714-00358  
**Permit Reviewer:** Houlton Roberts

<table>
<thead>
<tr>
<th>Facility/Operation</th>
<th>PM/PM$_{10}$ Emission Factor (lbs/kin)</th>
<th>Mn Emission Factor (lbs/kin)</th>
<th>Ni Emission Factor (lbs/kin)</th>
<th>Cr Emission Factor (lbs/kin)</th>
<th>Uncontrolled PM/PM$_{10}$ Emissions (tons/yr)</th>
<th>Uncontrolled Mn Emissions (tons/yr)</th>
<th>Uncontrolled Ni Emissions (tons/yr)</th>
<th>Uncontrolled Cr Emissions (tons/yr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>manual torch cutting/burning</td>
<td>0.1622</td>
<td>0.0005</td>
<td>0.0001</td>
<td>0.0003</td>
<td>2.42</td>
<td>0.01</td>
<td>1.49E-03</td>
<td>4.47E-03</td>
</tr>
</tbody>
</table>

*Pursuant to 326 IAC 6-3-1(b)(10), maximum cutting allowable for exempt status*

**Methodology:**

PM = PM$_{10}$

Maximum cutting (kin/yr) = 3,400 in/hr x 8760 hr/yr x kin/1000 inches

Assumed oxyacetylene torch used for cutting/burning of carbon steel

Uncontrolled Emissions (tons/yr) = Emission Factor (lbs/kin)*Max cutting (kin/yr)/2000 (lbs/ton)
May 14, 2021

Glenn Hundertmark
Harsco Metals Americas, a Division of Harsco
300 Seven Fields Blvd
Seven Fields PA 16046

Re: Public Notice
Harsco Environmental
Permit Level: Title V Renewal Administrative Permit
Permit Number: 089-43714-00358

Dear Glenn Hundertmark:

Enclosed is the Notice of 30-Day Period for Public Comment for your draft air permit.

Our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person. The Notice of 30-Day Period for Public Comment has also been sent to the OAQ Permits Branch Interested Parties List and, if applicable, your Consultant/Agent and/or Responsible Official/Authorized Individual.

The preliminary findings, including the draft permit, technical support document, emission calculations, and other supporting documents, are available electronically at:

IDEM’s online searchable database: http://www.in.gov/apps/idem/caats/. Choose Search Option by Permit Number, then enter permit 43714

and

IDEM’s Virtual File Cabinet (VFC): https://www.IN.gov/idem. Enter VFC in the search box, then search for permit documents using a variety of criteria, such as Program area, date range, permit #, Agency Interest Number, or Source ID.

The Public Notice period will begin the date the Notice is published on the IDEM Official Public Notice website. Publication has been requested and is expected within 2-3 business days. You may check the exact Public Notice begins and ends date here: https://www.in.gov/idem/public-notices/

Please note that as of April 17, 2019, IDEM is no longer required to publish the notice in a newspaper.

OAQ has submitted the draft permit package to the East Chicago Public Library, - 151st St Center 4925 Gladiola St, East Chicago IN 46312. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.
Please review the draft permit documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Houlton Roberts, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 4-4967 or dial (317) 23 4-4967.

Sincerely,

L. Pogost

L. Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter access via website 8/10/2020
May 14, 2021

To: East Chicago Public Library - 151st St Center 4925 Gladiola St East Chicago IN 46312

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Harsco Environmental
Permit Number: 089-43714-00358

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

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

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

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

If you have any questions concerning this public review process, please contact Joanne Smiddle-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library updated 4/2019
AFFECTED STATE NOTIFICATION OF PUBLIC COMMENT PERIOD
DRAFT INDIANA AIR PERMIT

May 14, 2021

A 30-day public comment period has been initiated for:

Permit Number: 089-43714-00358
Applicant Name: Harsco Environmental
Location: East Chicago, Lake County, Indiana

The public notice, draft permit and technical support documents can be accessed via the IDEM Air Permits Online site at:
http://www.in.gov/ai/appfiles/idem-caats/

Questions or comments on this draft permit should be directed to the person identified in the public notice by telephone or in writing to:

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

Questions or comments regarding this email notification or access to this information from the EPA Internet site can be directed to Chris Hammack at chammack@idem.IN.gov or (317) 233-2414.
Notice of Public Comment

May 14, 2021
Harsco Environmental
089-43714-00358

Dear Concerned Citizen(s):

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

Enclosed is a Notice of Public Comment, which has posted on IDEM’s Public Notice website at https://www.in.gov/idem/public-notices/.

The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

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

Please Note: If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Joanne Smiddie-Brush with the Air Permits Administration Section at 1-800-451-6027, ext. 3-0185 or via e-mail at JBRUSH@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.

Enclosure
PN AAA Cover Letter 2/28/2020
## Mail Code 61-53

**IDEA Staff**
LPOGOST 5/14/2021
Harsco Metals Americas, a Division of Harsco Environmental 089-43714-00358 draft

**Type of Mail:** CERTIFICATE OF MAILING ONLY

<table>
<thead>
<tr>
<th>Line</th>
<th>Article Number</th>
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<th>Rest. Del. Fee</th>
<th>Remarks</th>
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<tr>
<td>1</td>
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<td>Glenn Hundertmark  Harsco Metals Americas, a Division of Harsco Envir 300 Seven Fields Blvd Seven Fields PA 16046 (Source CAATS)</td>
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<td>Timothy Jackson  Harsco Metals Americas, a Division of Harsco Envir 300 Seven Fields Blvd Seven Fields PA 16046 (RO CAATS)</td>
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<td>3</td>
<td></td>
<td>East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)</td>
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<td>Indiana State Representative 2nd District 4114 Butternut St East Chicago IN 46312 (Legislator)</td>
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<td>WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)</td>
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<td>Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)</td>
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<td>Craig Hogarth  7901 West Morris Street Indianapolis IN 46231 (Affected Party)</td>
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<td>Responsible Official Arcelor Mittal 3210 Watling St. East Chicago IN 46312-1610 (source - addl contact)</td>
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<td>Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)</td>
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<td>Anthony Copeland  2006 E. 140th Street East Chicago IN 46312 (Affected Party)</td>
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<td>Barbara G. Perez  506 Lilac Street East Chicago IN 46312 (Affected Party)</td>
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<td>Mr. Robert Garcia  3733 Parrish Avenue East Chicago IN 46312 (Affected Party)</td>
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<td>Ms. Karen Kroczek  8212 Madison Ave Munster IN 46321-1627 (Affected Party)</td>
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<td>Joseph Hero  11723 S Oakridge Drive St. John IN 46373 (Affected Party)</td>
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<td></td>
<td>City of Gary Dept. of Environmental Affairs 401 Broadway Suite 304 Gary IN 46402 (Local Official)</td>
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**Total number of pieces Listed by Sender**

**Total number of Pieces Received at Post Office**

**Postmaster, Per (Name of Receiving employee)**

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### Mail Code 61-53

**Name and address of Sender**

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<td>1</td>
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<td>Ronald R. Valparaiso Safety &amp; Environmental Consultants, Inc 653 West 23rd Street #302 Panama City FL 32405 (Consultant)</td>
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<td>Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)</td>
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<td>Jeff Mayes News-Dispatch 422 Franklin St Michigan City IN 46360 (Affected Party)</td>
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<td>East Chicago City Health Department 100 W Chicago Ave East Chicago IN 46312 (Health Department)</td>
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<td>Lake County Health Department 2900 W 93rd Ave Crown Point IN 46307 (Health Department)</td>
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<td>East Chicago Public Library - 151st St Center 4925 Gladiola St East Chicago IN 46312 (Library)</td>
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