



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 17 2012

REPLY TO THE ATTENTION OF:

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

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed the draft Title V renewal permit for ArcelorMittal USA, Inc., permit number T089-29993-00316, in East Chicago, Indiana. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

- 1.) For each emission unit in section D of the permit, emission rate limitations are established for particulate matter (PM), PM10, and total suspended particulates (TSP). The emission rates are generally defined in terms of grains per dry standard cubic foot and pounds per hour. However, the permit does not contain requirements to monitor and record the PM, PM10, and TSP emission rates. Please clarify how compliance with each emission rate limit is ensured in the permit or add conditions to the permit containing sufficient monitoring, recordkeeping, and reporting to ensure compliance with these emission rate limits.
- 2.) Conditions D.2.4, D.5.2, D.6.2, and D.8.3 establish opacity limits for several units at the facility. However, the permit does not list a monitoring method, a monitoring frequency, and recordkeeping sufficient to ensure compliance with these limits. Please add an appropriate monitoring method, monitoring frequency, and appropriate recordkeeping to the permit to ensure compliance with the opacity limits.
- 3.) Conditions D.4.5, D.5.2, D.6.2, D.8.14, and D.14.6 require the facility to monitor pressure drop across each baghouse to ensure correct operation of each baghouse. However, measuring pressure drop alone across each baghouse may not be enough to ensure proper operation of the baghouse since the output from each baghouse can vary with a relatively small change in pressure drop. Please explain why measuring only pressure drop is sufficient to ensure proper operation of each baghouse, provide

additional parametric monitoring to ensure proper operation of each baghouse, or require the use of a baghouse leak detection system to ensure the same.

- 4.) Condition D.2.3 cites 326 IAC 6.8-3 as the underlying requirement for establishing opacity requirements. 326 IAC 6.8-3 was repealed by Indiana's Air Pollution Control Board on January 23, 2008. A more appropriate underlying requirement for this condition may be 326 IAC 6.8-2-17(b).

We appreciate the opportunity to provide comments on this draft permit. If you have any questions, please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico". The signature is written in dark ink and is positioned above the typed name.

Genevieve Damico
Chief
Air Permits Section