



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

JUN 30 2016

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Terry Nanti
General Manager
Mag Pellet LLC
64 East 100 North
Reynolds, Indiana 47980

Re: Notice of Violation
Mag Pellet LLC
Reynolds, Indiana

Dear Mr. Nanti:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Mag Pellet LLC (Mag Pellet or you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). We find that you are violating the CAA and the Indiana State Implementation Plan at your Reynolds, Indiana facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Patrick Miller. You may call him at (312) 886-4044 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,



Edward Nam
Acting Director
Air and Radiation Division

Enclosure

cc: Mike Twite
Magnetation LLC

Janusz Johnson
Section Chief, Office of Air Quality
Indiana Department of Environmental Management

Rebecca Hayes
Compliance and Enforcement Manager, Office of Air Quality
Indiana Department of Environmental Management

7. 40 C.F.R. § 70.1(b) provides that all sources subject to Title V shall have a permit to operate that assures compliance by the source with all applicable requirements.
8. 40 C.F.R. § 70.2 defines "applicable requirement" in part, to include, among other things, any standard or other requirements provided for in the applicable implementation plan approved or promulgated by EPA through rulemaking under Title I of the Act that implements the relevant requirements of the Act.
9. 40 C.F.R. § 70.7(b) provides that no source subject to 40 C.F.R. Part 70 requirements may operate without a permit as specified in the Act.
10. 40 C.F.R. § 70.5(a) and (c) require the owner or operator to submit timely and complete permit applications for Title V permits. These regulations also specify the required information in that permit application. 40 C.F.R. § 70.6 specifies required permit content. 40 C.F.R. § 70.6(c) requires that Title V permits include requirements for compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices and the status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance was continuous or intermittent.
11. 40 C.F.R. § 70.5(b) provides that any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

Indiana Title V Requirements

12. On November 14, 1995, EPA approved the Indiana Title V program as part of the federally enforceable SIP for Indiana. 60 Fed. Reg. 57191.
13. On December 14, 1995, EPA granted interim approval of 326 IAC 2-7-5, governing Title V permit content as part of the Indiana's operating permits program. 60 Fed. Reg. 57188. On November 30, 2001, EPA granted final full approval. 66 Fed. Reg. 62969.
14. 326 IAC 2-7-5(1) provides that Title V permits shall incorporate emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of a Part 70 permit issuance.
15. On December 14, 1995, EPA granted interim approval of 326 IAC 2-7-6, governing Title V operating permits compliance requirements. 60 Fed. Reg. 57188. On November 30, 2001, EPA granted final full approval. 66 Fed. Reg. 62969.
16. 326 IAC 2-7-6(1) provides that Title V permits issued under this rule shall contain requirements with respect to compliance certification, testing, monitoring, reporting, and

record keeping sufficient to assure compliance with the terms and conditions of a Part 70 permit consistent with section 5(3) of this rule.

17. On July 18, 2007, EPA approved 326 IAC 2-2-3, governing control technology review requirements for best available control technology (BACT) analyses required for Prevention of Significant Deterioration (PSD) permit applications as part of the Indiana SIP. 72 Fed. Reg. 33395.
18. 326 IAC 2-2-3 provides that an owner or operator of a major stationary source shall apply BACT control technology for each regulated New Source Review (NSR) pollutant.
19. On June 18, 2013, EPA approved 326 IAC 1-4, governing the applicability of NSR for areas designated as attainment or unclassifiable in 326 IAC 1-4.
20. 326 IAC 2-2-2(b) provides that no new major stationary source subject to the requirement to obtain a PSD permit shall begin actual construction without a permit that states that the major stationary source will meet the requirements of PSD.

Mag Pellet Title V Requirements

21. On April 16, 2013, IDEM issued Mag Pellet Title V Permit Number T181-32081-00054 (Title V Permit) for its Reynolds, Indiana facility.
22. Section D of the Title V Permit lists the following emission unit and corresponding control device operating conditions:
 - a. Title V Permit Condition D.1.1 for EU001a and EU004b, raw material handling units, provides the PM₁₀ and PM_{2.5} PSD BACT emission limits for baghouses CE001 and CE004.
 - b. Title V Permit Condition D.1.5(a), raw material handling units, provides that CE001 shall be in operation and control PM emissions from EU001 at all times that EU001 is in operation; CE004 shall be in operation and control PM emissions from EU004b at all times that EU004b is in operation.
 - c. Title V Permit Condition D.2.1(a), additive grinding and mixing, provides the PM, PM₁₀, and PM_{2.5} PSD BACT emission limits for baghouses CE009, CE010, CE011a, CE011b, CE012, and CE023.
 - d. Title V Permit Condition D.2.4(a), additive grinding and mixing units, provides that CE023 shall be in operation and control PM emissions from EU025b at all times that EU025b is in operation; CE010 shall be in operation and control PM emissions from EU010 at all times that EU010 is in operation; CE011 shall be in operation and control PM emissions from EU011 at all times that EU011 is in operation; and CE012 shall be in operation and control PM emissions from EU012 at all times that EU012 is in operation.

- e. Title V Permit Condition D.3.1(a), induration unit, provides the PM, PM₁₀ and PM_{2.5} PSD BACT emission limits for baghouses CE017a and CE017b.
- f. Title V Permit Condition D.3.5(a), induration unit, provides that CE017a and CE017b shall be in operation and control PM emissions from EU015 at all times the EU015 is in operation.
- g. Title V Permit Condition D.3.17(a), induration unit, provides the parametric monitoring requirements for the gas suspension absorber (GSA) unit, CE015. The unit shall maintain the air flow rate at or above the minimum of 250,000 dscfm.
- h. Title V Permit Condition D.4.1 for EU016, separation and loadout units, provides the PM, PM₁₀ and PM_{2.5} PSD BACT emission limits for baghouse CE018.
- i. Title V Permit Condition D.4.1 for EU019a, separation and loadout units, provides the PM₁₀ and PM_{2.5} PSD BACT emission limits for baghouse CE019a.
- j. Title V Permit Condition D.4.4(a), separation and loadout units, provides that CE018 shall be in operation and control PM emissions from EU016 at all times that EU016 is in operation; CE019a shall be in operation and control PM emissions from EU019a at all times that EU019a is in operation.
- k. Title V Permit Condition D.5.1(a) for EU027, windbox exhaust air pollution control equipment, provides the PM₁₀ and PM_{2.5} PSD BACT emission limits for baghouse CE027.
- l. Title V Permit Condition D.5.3(a), windbox exhaust air pollution control equipment, provides that CE020 shall be in operation and control PM emissions from EU020 at all times that EU020 is in operation.

FINDING OF FACTS

- 23. Mag Pellet owns and operates an iron ore concentrate pelletizing plant at 64 East 100 North, Reynolds, Indiana.
- 24. Mag Pellet started operating on September 29, 2014.
- 25. Mag Pellet is a major source as defined by 40 C.F.R. § 70.2. Mag Pellet is also considered a new stationary source under the CAA.
- 26. Mag Pellet is located in White County, Indiana, which is designated as an attainment area for PM.
- 27. Mag Pellet conducted performance testing on various emissions units from August 25-September 3, 2015 and February 1-4, 2016. Performance testing was performed for PM, PM₁₀ and PM_{2.5} emissions.

28. Mag Pellet submitted a quarterly deviation report on May 6, 2016 to IDEM for the period January 1 – March 31, 2016.

Violations

Title V: Operating Parameters

29. For the following units on the following dates, Mag Pellet failed to operate air pollution control equipment when the associated emission unit was in operations, in violation of the listed Title V Permit requirements. The information was provided in the quarterly reports submitted by Mag Pellet to IDEM, listed in Paragraph 28.

Emission Unit (ID)	Control Device (ID)	Limit/ Requirement	Dates of Non-compliance	Requirement (Title V Permit and PSD/SIP)
Rail Car Unloading (EU001a)	Baghouse (CE001)	Operate control device when emission unit is in operation	1/8/16, 1/13/16, 1/16/16, 1/20/16, 1/24/16, 1/31/16, 2/6/16, 2/12/16, 2/14/16, 2/16/16, 2/17/16, 2/23/16, 2/24/16, 2/28/16, 3/1/16, 3/2/16, 3/10/16, 3/11/16 - 3/13/16, 3/19/16, 3/21/16, 3/22/16, 3/27/16, 3/28/16	D.1.4(a), 326 IAC 2-7-5(1)
Coke Breeze Unloading and Storage Area (EU004b)	Baghouse (CE004)	Operate control device when emission unit is in operation	1/21/16, 1/26/16, 3/2/16, 3/4/16, 3/15/16	D.1.4(a), 326 IAC 2-7-5(1)
Mixing Area Material Handling System (EU011)	Baghouse (CE011)	Operate control device when emission unit is in operation	1/7/16, 1/11/16, 1/13/16, 1/17/16, 1/19/16, 1/22/16, 1/25/16, 1/26/16, 1/29/16, 2/1/16, 2/3/16, 2/5/16, 2/9/16, 2/11/16, 2/13/16, 2/15/16, 2/17/16, 2/18/16, 2/20/16, 2/23/16, 2/25/16, 2/27/16, 3/2/16, 3/3/16, 3/4/16, 3/6/16, 3/9/16, 3/10/16, 3/11/16, 3/13/16, 3/15/16, 3/17/16, 3/18/16, 3/19/16, 3/20/16, 3/21/16, 3/22/16, 3/23/16, 3/24/16,	D.2.4(a), 326 IAC 2-7-5(1)

			3/25/16, 3/26/16, 3/29/16, 3/30/16	
Hearth Layer Bin System (EU012)	Baghouse (CE012)	Operate control device when emission unit is in operation	1/21/16, 1/27/16, 2/9/16, 2/11/16, 2/12/16, 2/16/16, 2/22/16, 2/29/16, 3/1/16, 3/7/16, 3/8/16, 3/9/16, 3/14/16, 3/15/16, 3/17/16, 3/24/16, 3/25/16, 3/28/16, 3/30/16, 3/31/16	D.2.4(a), 326 IAC 2-7-5(1)
Furnace Discharge System (EU015)	Baghouse (CE017)	Operate control device when emission unit is in operation	1/4/16, 1/6/16, 1/7/16, 1/13/16, 1/14/16, 1/15/16, 1/16/16 - 1/19/16, 1/20/16, 1/21/16, 1/22/16, 1/23/16, 1/28/16, 2/2/16, 2/4/16, 2/5/16, 2/6/16, 2/7/16, 2/8/16, 2/9/16, 2/11/16, 2/12/16, 2/13/16, 2/14/16-2/15/16, 2/17/16, 2/19/16, 2/21/16, 2/22/16, 2/26/16, 2/29/16, 3/1/16, 3/2/16, 3/4/16, 3/5/16, 3/7/16, 3/8/16, 3/10/16, 3/11/16, 3/14/16, 3/15/16, 3/16/16, 3/22/16, 3/23/16, 3/24/16, 3/25/16, 3/26/16, 3/28/16, 3/30/16, 3/31/16	D.3.5(a), 326 IAC 2-7-5(1)
Hearth Layer Separation System (EU016)	Baghouse (CE018)	Operate control device when emission unit is in operation	1/13/16, 1/21/16, 1/22/16, 1/23/16, 1/28/16, 1/30/16, 2/2/16, 2/3/16, 2/4/16, 2/5/16, 2/6/16, 2/7/16, 2/12/16, 2/13/16, 2/14/16, 2/15/16, 2/16/16, 2/18/16, 2/19/16, 2/20/16, 2/26/16, 3/1/16, 3/2/16, 3/5/16, 3/7/16, 3/8/16, 3/9/16, 3/10/16, 3/11/16, 3/15/16, 3/16/16, 3/17/16, 3/18/16, 3/21/16, 3/22/16, 3/24/16, 3/25/16, 3/26/16, 3/28/16, 3/29/16, 3/30/16, 3/31/16	D.4.4(a), 326 IAC 2-7-5(1)
Oxide Pellet Storage and Unloading	Baghouse (CE019a)	Operate control device when emission unit is in operation	2/3/16, 2/26/16, 2/29/16, 3/1/16, 3/7/16, 3/8/16, 3/10/16, 3/12/16, 3/17/16, 3/18/16, 3/19/16, 3/21/16,	D.4.4(a), 326 IAC 2-7-5(1)

System (EU019a)			3/22/16, 3/24/16, 3/28/16, 3/29/16, 3/30/16, 3/31/16	
Limestone & Dolomite Grinding Mill Bin Area (EU025b)	Baghouse (CE023)	Operate control device when emission unit is in operation	1/21/16, 1/25/16, 1/29/16, 2/10/16, 2/12/16, 2/15/16, 3/4/16, 3/7/16, 3/10/16, 3/11/16, 3/15/16, 3/16/16, 3/17/16, 3/24/16, 3/25/16	D.2.4(a), 326 IAC 2-7-5(1)

30. On the following dates, Mag Pellet failed to operate the Gas Suspension Absorber (GSA) above the minimum air flow rate, in violation of the Title V Permit requirement. The information was provided in the quarterly reports submitted by Mag Pellet to IDEM, listed in Paragraph 28.

Emission Unit (ID)	Control Device (ID)	Limit/ Requirement	Dates of Non-Compliance	Requirement (Title V Permit and PSD/SIP)
Furnace Windbox (EU014)	GSA (CE015)	Maintain air flow rate at or above the minimum of 250,000 dscfm	1/1/16 – 1/5/16, 1/6/16 – 1/10/16, 1/12/16 – 1/13/16, 1/14/16 – 1/15/16, 1/15/16 – 1/16/16, 1/17/16 – 1/18/16, 1/19/16 – 1/25/16, 1/26/16 – 1/27/16, 1/28/16, 1/29/16 – 1/30/16, 1/30/16 – 2/2/16, 2/2/16 – 2/9/16, 2/10/16 – 3/2/16, 3/3/16 – 3/7/16, 3/7/16 – 3/8/16, 3/9/16 – 3/11/16, 3/11/16 – 3/12/16, 3/15/16, 3/21/16, 3/27/16 – 3/31/16	D.3.17(a), 326 IAC 2-7-5(1) and 326 IAC 2-7-6(1)

31. For the dates provided below, Mag Pellet failed to operate the following emission units consistent with the permitted construction design in violation of 326 IAC 2-7-4(c)(3) and 326 IAC 2-7-5(14). The information was provided in the quarterly reports submitted by Mag Pellet to IDEM, listed in Paragraph 28.
- a. From start-up on September 20, 2014 to present, Title V Permit Condition A.2(o) for bin vent CE020; and
 - b. From start-up on September 20, 2014 to present, Title V Permit Condition D.6.1(e) for paved roads.

Title V: Operating Parameters

32. On various days between August 25 and September 3, 2015, Mag Pellet conducted performance testing at the facility. The following are emission exceedances of the facility's PSD BACT and Title V Permit limits demonstrated during the performance testing in violation of 326 IAC 2-2-3.

Emission Unit (ID)	Control Device (ID)	Pollutant	Emission Limit	2015 Stack Test Results	Requirement (Title V Permit and PSD BACT)
Coke Breeze Unloading (EU004b)	Baghouse (CE004)	PM ₁₀ gr/dscf	0.002	0.006	D.1.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.1388	0.35	D.1.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.006	D.1.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.1388	0.35	D.1.1(a) and 326 IAC 2-2-3
Mixing Area Material Handling System (EU011)	(CE011a and CE011b)	PM ₁₀ gr/dscf	0.002	0.0022	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.0022	D.2.1(a) and 326 IAC 2-2-3
Oxide Pellet Storage and Unloading System (EU019a)	Baghouse (CE019a)	PM ₁₀ gr/dscf	0.002	0.034	D.4.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.13	1.56	D.4.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.034	D.4.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.13	1.56	D.4.1(a) and 326 IAC 2-2-3
Limestone & Dolomite Grinding Mill Bin Area (EU025b)	Baghouse (CE023)	PM ₁₀ gr/dscf	0.002	0.0063	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.26	0.57	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.0063	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.26	0.57	D.2.1(a) and 326 IAC 2-2-3
Dust Recycle Surge Hopper (EU027)	Baghouse (CE027)	PM ₁₀ gr/dscf	0.002	0.033	D.5.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.05	0.49	D.5.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.033	D.5.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.05	0.49	D.5.1(a) and 326 IAC 2-2-3

33. On various days between February 1 and February 4, 2016, Mag Pellet conducted performance testing at the facility. The following are emission exceedances of the facility's PSD BACT and Title V Permit limits demonstrated during the performance testing in violation of 326 IAC 2-2-3.

Emission Unit (ID)	Control Device (ID)	Pollutant	Emission Limit	2016 Stack Test Results	Requirement (Title V Permit and PSD BACT)
Coke Breeze Additive System (EU009)	Baghouse (CE009)	PM gr/dscf	0.002	0.0091	D.2.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.14	0.81	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.0163	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.14	1.45	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.0163	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.14	1.45	D.2.1(a) and 326 IAC 2-2-3

Ground Limestone and Dolomite Additive System (EU010)	Baghouse (CE010)	PM gr/dscf	0.002	0.041	D.2.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.32	9.44	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.029	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.32	6.74	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.029	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.32	6.74	D.2.1(a) and 326 IAC 2-2-3
Mixing Area Material Handling System (EU011)	Baghouse (CE011a and CE011b)	PM gr/dscf	0.002	0.019	D.2.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.77	3.88	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.019	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.77	3.88	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.019	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.77	3.88	D.2.1(a) and 326 IAC 2-2-3
Hearth Layer Bin System (EU012)	Baghouse (CE012)	PM gr/dscf	0.002	0.012	D.2.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.11	0.49	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.012	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.11	0.49	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.012	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.11	0.49	D.2.1(a) and 326 IAC 2-2-3
Furnace Discharge System (EU015)	Baghouse (CE017a and CE017b)	PM gr/dscf	0.002	0.018	D.3.1(a) and 326 IAC 2-2-3
		PM lb/hr	1.01	4.67	D.3.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.018	D.3.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	1.01	4.67	D.3.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.018	D.3.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	1.01	4.67	D.3.1(a) and 326 IAC 2-2-3
Hearth Layer Separation System (EU016)	Baghouse (CE018)	PM gr/dscf	0.002	0.007	D.4.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.49	0.82	D.4.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.007	D.4.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.49	0.82	D.4.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.007	D.4.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.49	0.82	D.4.1(a) and 326 IAC 2-2-3
Limestone & Dolomite Grinding Mill Bin Area (EU025b)	Baghouse (CE023)	PM gr/dscf	0.002	0.008	D.2.1(a) and 326 IAC 2-2-3
		PM lb/hr	0.26	1.43	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ gr/dscf	0.002	0.008	D.2.1(a) and 326 IAC 2-2-3
		PM ₁₀ lb/hr	0.26	1.43	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} gr/dscf	0.002	0.008	D.2.1(a) and 326 IAC 2-2-3
		PM _{2.5} lb/hr	0.26	1.43	D.2.1(a) and 326 IAC 2-2-3

Indiana State Implementation Plan

34. Mag Pellet violated 326 IAC 2-1.1-2(a), 326 IAC 2-2-2 and 326 IAC 2-2-3 by constructing and operating an emergency hearth layer separation conveyor without obtaining a permit to construct as required by 326 IAC 2-1.1-2(a), without obtaining a PSD permit as required by 326 IAC 2-2-2 and without conducting a Best Available

Control Technology analysis as required by 326 IAC 2-2-3 prior to construction and operation of the unit.

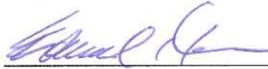
Environmental Impact of Violations

35. These violations have caused or can cause excess emissions of particulate matter (PM). Violation of the PM standards increases public exposure to unhealthy PM. PM, especially fine particulates contains microscopic solids or liquid droplets, which can get deep into the lungs and cause serious health problems. PM contributes to:

- irritation of the airways, coughing, and difficulty breathing;
- decreased lung function;
- aggravated asthma;
- chronic bronchitis;
- irregular heartbeat;
- nonfatal heart attacks; and
- premature death in people with heart or lung disease.

Date

6/30/16


Edward Nam
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-16-IN-09, by

Certified Mail, Return Receipt Requested, to:

Terry Nanti
General Manager
Mag Pellet LLC
64 East 100 North
Reynolds, Indiana 47980

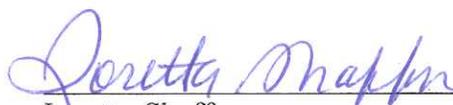
I also certify that I sent copies of the Notice of Violation by first-class mail to:

Mike Twite
Corporate Environmental Manager
Magnetation LLC
102 NE 3rd Street, Suite 120
Grand Rapids, Minnesota 55744

Janusz Johnson
Section Chief, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Rebecca Hayes
Compliance and Enforcement Manager, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

On the 30 day of June 2016.



Loretta Shaffer
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 70091680 0000 7673 7975