



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

August 7, 2019

Mr. Jeffrey May
ArcelorMittal Burns Harbor, LLC
250 West US Highway 12
Burns Harbor, IN 46304-9745

Re: Inspection Summary Letter
ArcelorMittal Burns Harbor, LLC
Plant ID Number: 127-00001
Burns Harbor, Porter County

Dear Mr. May:

On August 6, 2019, a representative of the Indiana Department of Environmental Management (IDEM), Northwest Regional Office (NWRO), conducted an inspection of ArcelorMittal Burns Harbor, Specifically Regulated Insignificant Activities at 250 West US Highway 12, Burns Harbor, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

- Type of Inspection:
- Commitment
 - Surveillance
 - Complaint
 - Other
- Results of Inspection:
- No violations were observed.
 - Violations were observed.
 - Violations were observed but corrected during the inspection.
 - Additional information/review is required to evaluate overall compliance.
 - Violations were observed and will result in an enforcement action.

Please direct any response to this letter and any questions to Kevin Davis at 219-306-1240 or by email at ktdavis@idem.in.gov. Thank you for your attention to this matter.

A copy of the Inspection Report will be placed IDEM's Virtual File Cabinet (VFC) within 14 days and will be available at <https://vfc.idem.in.gov/DocumentSearch.aspx>. The Inspection Report can be found in VFC by using the following search criteria:

- *Program*: OAQ
- *Document Type*: Inspection
- If Permitted source:
 - In *Alternate Field*, choose Air Source ID
 - In the *ID #* field, enter the Source ID (xxx-xxxxx)
- If Unpermitted source:

In *Full Text Search* field, enter the Source ID, company name, or ACES ID at the bottom of this letter.

Sincerely,



Kevin Davis
Senior Environmental Manager
Northwest Regional Office

ACES ID: 239303

cc: IDEM Office of Air Quality

**OFFICE OF AIR QUALITY
FIELD INSPECTION REPORT**

8/7/19

File: Porter County
Thru: RGM

SOURCE: ArcelorMittal Burns Harbor, LLC
Specifically Regulated Insignificant
Activities

PLANT ID NUMBER: 127-00001
INSPECTED BY: Kevin Davis
TIME IN: 0845 TIME OUT: 1030
INSPECTION DATE: 8-6-19
REPORTED BY: Kevin Davis
REPORT DATE: 8-7-19
ACES NUMBER: 239303

LOCATION: 250 West US Highway 12

CITY: Burns Harbor

COUNTY: Porter

COMPLAINT INVESTIGATION: YES NO COMPLAINT NUMBER: N/A

ATTAINMENT:

NONATTAINMENT: SO₂ CO O₃ NO₂ Pb PM₁₀ PM_{2.5}

PERMIT TYPE: Title V

PERMIT NO: T127-40675-00001

CHECK IF APPLICABLE: NSPS NESHAP PSD OTHER:

PERSONS/TITLE INTERVIEWED:

| Name | Title | Phone Number | Email |
|---------------|---|--------------|-------------------------------|
| Jeffrey May | Environmental Manager | 219-787-4964 | Jeffrey.May@arcelormittal.com |
| Tom Zendzian | Coke Plant Manager | | |
| Robbie Watson | Blast Furnace Manager | | |
| Emily Robben | Bruce Carter Associates, Administrative Assistant | | |

OBJECTIVES:

| | | | |
|---|-------------------------------------|--------------|--------------------------|
| Compliance Monitoring Strategy | <input checked="" type="checkbox"/> | Commitment | <input type="checkbox"/> |
| Multimedia Screening | <input type="checkbox"/> | Surveillance | <input type="checkbox"/> |
| Complaint | <input type="checkbox"/> | Other: | <input type="checkbox"/> |
| Mega-site: PCE <input type="checkbox"/> FCE <input checked="" type="checkbox"/> | | | |

Announced Inspection:

Unannounced Inspection:

Were all relevant documents reviewed prior to the inspection: Yes No (explain)

DESCRIPTION OF SOURCE:

The source is a stationary integrated steel mill.

BACKGROUND:

A commitment inspection was performed on August 8, 2017. No violations were observed at the time of the inspection. A Title V Second Renewal Permit (127-40675-00001) was issued on May 31, 2019.

PROCESS DESCRIPTION/FINDINGS/OBSERVATIONS:

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| A. Permit Section D.13 | Specifically Regulated Insignificant Activities |
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1. Process Description:

Petroleum fuel and gasoline dispensing facility, cold cleaner degreasing operations and other insignificant activities.

2. Equipment:

- (a) A petroleum fuel, other than gasoline, dispensing facility with monthly throughput rate of less than 10,000 gallons
- (b) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months
- (d) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees Celsius (100°F); or
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees Celsius C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (f) Any of the following structural steel and bridge fabrication activities:
 - (1) Cutting 200,000 linear feet or less of one (1) inch plate or equivalent.
 - (2) Using 80 tons or less of welding consumables.
- (g) Conveyors as follows: Covered conveyor for coal or coke conveying of less than or equal to 360 tons per day.
- (h) Coal bunker and coal scale exhausts and associated dust collector vents.
- (i) Grinding and machining operations with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (j) Vents from ash transport systems not operated at positive pressure.

3. Pollutants Emitted: SO₂ NO_x CO VOC PM PM₁₀ PM_{2.5} HAPS GHG's

4. Control Equipment:

| Control Equipment/Identification | Exhaust to: |
|----------------------------------|-------------|
| Fabric filters | Atmosphere |
| Scrubbers | Atmosphere |
| Mist Collectors | Atmosphere |
| Wet Collectors | Atmosphere |
| Electrostatic Precipitators | Atmosphere |

5. Applicable Rules:

Emission Limitations and Standards [326 IAC 2-7-5(1)], Particulate Emission Limitations for Manufacturing Processes [326 IAC 6-3-2], Volatile Organic Compounds (VOC) [326 IAC 8-3-2], Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1], Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers), Compliance Determination Requirement [326 IAC 2-7-5(1), Opacity [326 IAC-5-1].

6. Observations:

When I arrived at ArcelorMittal Burns Harbor, LLC, I met with Mr. Jeffrey May and reviewed the records associated with Permit Section D.13. Mr. May and Ms. Emily Robben then gave me a tour of the dispensing facility. ArcelorMittal updated its fuel dispensing facility approximately three (3) years ago. The automated dispensing facility is named The Gas Boy System. The diesel fuel

tank during the inspection showed no leaks and the hoses were in their proper location. I was then given a tour of the coal bunker and coal scale exhausts and dust collector vents. No emissions were observed escaping from the process. I then observed the covered conveyor for coal or coke conveying. The conveyor was operating at the time of the inspection. No emissions were observed escaping from the process. The brazing equipment, cutting torches, soldering equipment, welding equipment, grinding and machining operations were not operating at the time of the inspection. Mr. May informed me that these activities are usually performed by contractors on an as needed basis. The ash transport systems have not been used in several years, due to the lack of fuel oil use which creates the ash. Mr. May, Ms. Robben and I then met with Mr. Tom Zendzian of the Coke Plant and he gave us a tour of the cold cleaning degreasers located in the Coke Plant. One (1) of the degreasers was located in the #2 Battery Coke Mechanical Shop and the other was located in the Coal and Chemical Mechanical Shop. Both degreasers were properly labeled and the lids were closed and no leaks were observed. We then met with Mr. Robbie Watson of the Blast Furnace Department and he gave us a tour of two (2) cold cleaning degreasers in the Blast Furnace Department. One (1) of the degreasers was located in the Blast Furnace Repair Shop and the other was located in the Blast Furnace Stock House Building. The degreasers were properly labeled and the lids were closed and no leaks were observed. Mr. May informed me that the degreasers are serviced on an as needed basis by Safety-Kleen, Inc.

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| <p>Emission Limit/Standard</p> | <p>D.13.1 Particulate Emission Limitations For Manufacturing Processes [326 IAC 6-3-2]</p> <p>Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour, and the methods in 326 IAC 6-3-2(b) through (d) do not apply, shall not exceed 0.551 pounds per hour.</p> <p>D.13.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]</p> <p>(a) Pursuant to 326 IAC 8-3-2 (Cold Cleaner Degreaser Control Equipment and Operating Requirements), the Permittee shall ensure the following control equipment and operating requirements are met:</p> <ul style="list-style-type: none"> (1) Equip the degreaser with a cover. (2) Equip the degreaser with a device for draining cleaned parts. (3) Close the degreaser cover whenever parts are not being handled in the |
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| | <p>degreaser.</p> <ul style="list-style-type: none">(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.(5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).(6) Store waste solvent only in closed containers.(7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere. <p>(b) The owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:</p> <ul style="list-style-type: none">(1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):<ul style="list-style-type: none">(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.(B) A water cover when solvent used is insoluble in, and heavier than, water.(C) A refrigerated chiller.(D) Carbon adsorption.(E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.(2) Ensure the degreaser cover is |
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| | <p>designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.</p> <p>(3) If used, solvent spray:</p> <p>(A) must be a solid, fluid stream; and (B) shall be applied at a pressure that does not cause excessive splashing</p> <p>D.13.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]</p> <p>Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a) and (b) for all stationary vessels used to store volatile organic liquids.</p> <p>D.13.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers)</p> <p>Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaner degreasers), the Permittee shall not operate the cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteenthousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).</p> |
| Preventive Maintenance Plan | Required: <input type="checkbox"/> Prepared: <input type="checkbox"/> Available on Site: <input type="checkbox"/> Adequate: <input type="checkbox"/> N/A: <input checked="" type="checkbox"/> |
| Compliance Response Plan | Required: <input type="checkbox"/> Prepared: <input type="checkbox"/> Available on Site: <input type="checkbox"/> Adequate: <input type="checkbox"/> N/A: <input checked="" type="checkbox"/> |
| Testing Requirements | N/A |
| Compliance Determination | <p>D.13.5 Particulate Control</p> <p>In order to comply with D.13.1, the control equipment shall be in operation and control particulate emissions from the insignificant grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting;</p> |

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| | pneumatic conveying; and woodworking operations, at all times these operations are in operation. |
| Compliance Monitoring | N/A |
| Recordkeeping | Are required records on site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Type of records checked: The vessel identification number, the vessel dimensions and the vessel capacity. The name and address of the solvent supplier, the date of purchase, and the type of solvent purchased, the total volume of the solvent purchased, the true vapor pressure of the solvent. Dates or amount of records checked: August 2017 through August 2019 Are records consistent with observations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |
| Reporting | Have all required reports been submitted in a timely manner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Are reports consistent with observations? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> |

7. Compliance Status:
 No violations of the State of Indiana's air rules or this section of the company's permit were discovered at the time of the inspection.
8. Additional Comments:
 None

GENERAL SOURCE ISSUES:

1. Does the permit accurately represent the emission units observed? Yes No N/A
 If no, explain:
2. Have violations been documented by photographs? Yes No N/A
3. Were Pollution Prevention opportunities discussed? Yes No N/A
4. Per the source, are they required to have a Risk Management Plan? Yes No N/A
 If yes, does the source have a plan? Yes No N/A
 Have the employees been trained? Yes No N/A
5. Has the source submitted an acceptable Annual Compliance Certification for the current applicable year? Yes No N/A

ADDITIONAL COMMENTS:

None

CONCLUSIONS:

No violations of the State of Indiana's air rules or of this section of the company's permit were discovered at the time of the inspection.

RECOMMENDATIONS:

I recommend inspecting this source according to the Compliance Monitoring Strategy (CMS).

EXIT INTERVIEW:

I informed Mr. May of my findings, conclusion and recommendation prior to exiting the plant on August 6, 2019.

ATTACHMENTS:

None

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