AIR EMISSION PERMIT NO. 13700062- 002

IS ISSUED TO

Mittal Steel USA Inc

MITTAL STEEL USA - MINORCA MINE INC
5950 Old Highway 53 North
Virginia, St. Louis County, MN 55792

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	01/17/1995
Minor Amendment	04/03/2006

This permit supersedes Permit No. 13700062- 001 and authorizes the Permittee to operate the stationary source at the address listed above and mine the East Reserve pit unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/Major for NSR

Issue Date: February 12, 2007

Expiration: 01/14/2005
All Title I Conditions do not expire.
The Permittee can continue to operate this facility after the expiration date of this permit per the provision under Minn. R. 7007.0450, subp. 3 (Title V Re-issuance application received on March 1, 2002).

Ann M. Foss, Director
Mining Sector
Industrial Division

for Brad Moore
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

Mittal Steel USA - Minorca Mine Inc., formerly known as Ispat Inland Steel Mining Company produces taconite pellets for sale to the steel industry. This facility is capable of producing flux pellets and acid pellets. The facility is capable of producing 400 tons/hour and 3,200,000 tons per year of pellets (flux, acid, or combination of both). This facility has one induration furnace.

The taconite pellet production process consists of a number of interrelated operations. These operations include ore mining, ore crushing, ore concentrating, pelletizing and shipping. The production of flux pellets also requires fluxstone (typically limestone) processing. In 1987 Inland Steel was issued a Prevention of Significant Deterioration (PSD) permit for the installation of auxiliary burners in the induration furnace and the installation of fluxstone handling equipment. The installation of the fluxstone equipment also included the relocation of existing coal handling equipment to be used in the fluxstone processing operations. Mittal Steel USA no longer has the capability to handle coal and transport it to the induration furnace without undergoing a modification and permit approval.

Appendix I to Permit 1370062-001: Visible Emissions Checklist(s) Requirements

Emission Units and Stack/Vents:

The Permittee shall monitor, record and maintain records of the following information for SV002, 003, 009, 010, 012, 013 and 022**.**

Visible Emissions Checklist(s):

1) Initials of observer;
2) Date and time of observation;
3) Indication of process and control equipment performance, either "requires attention", or" does not require attention". This determination is based upon an observed change in visible emission characteristics from that observed when this source and its pollution control equipment are properly operated and maintained. A change in visible emission characteristics will be indicative of "requires attention";
4) Facility identification of emission unit.
5) Short description of emission unit.

The Permittee shall retain a central facility checklist of the following information to support the Visible Emission Checklist(s):

1) Description of investigation and corrective actions completed for each “requires attention” observation marked on the visible emission checklist(s);
2) Weather conditions (temperature, cloud cover, wind, precipitation);
3) A key which will enable an inspector to cross reference the identification numbers or names used on the visible emission checklist(s) to the Emission Unit (EU), Stack/Vent (SV) and Control Equipment (CE) numbers used in the Title V permit.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Mittal Steel USA - Minorca Mine Inc

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Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: **Total Facility**

What to do	Why to do it
Air Pollution Control Equipment: Operate all air pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Comply with the O&M Plan: Follow the actions and record keeping specified in the O&M plan. The plan may be amended with Commissioner's written approval.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operations & Maintenance Plan: The O&M plan shall identify all air pollution control equipment, a preventative maintenance program for that equipment, description of corrective actions to be taken in the event of a malfunction, breakdown or deviation outside operating parameter ranges, description of the employee training program, and the records kept to demonstrate plan implementation. The Commissioner may require additions or changes to the O & M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Visible Emissions Training: The Permittee shall (1) ensure that one plant employee obtain an initial EPA Method 9 certification and be recertified every three years; or (2) employ a similarly certified contractor. This person will train other plant employees to perform the daily visible emissions check as detailed in the O & M Plan and Fugitive Control Plan.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Visible Emissions Check: Prior to approval of the O&M Plan, the Permittee shall check visible emissions from SV 002, 003, 009, 010, 012, 013, and 022 once daily when in operation during daylight hours. A form(s) meeting the requirements of Appendix I shall be used to indicate whether process or control equipment requires attention. In the event the Permittee makes a finding that attention is required, the Permittee shall investigate the process and control equipment performance and implement appropriate corrective action, if necessary. Upon approval of the O&M Plan, the Permittee shall check visible emissions from SV 002, 003, 009, 010, 012, 013, and 022 once daily when in operation during daylight hours. The Permittee shall use the visible emissions checklists in the O&M Plan as a means to indicate when appropriate corrective actions in the O&M Plan should be taken.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Visible Emissions Checklist(s): The Permittee shall use one or more checklists that contain SV 002, 003, 009, 010, 012, 013, and 022. These checklist(s) will be a part of the O&M plan. The checklist or checklists must contain at a minimum the information contained in Appendix I.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Fugitive Emission Control Plan: The plan shall identify all fugitive emission sources, primary and contingent control measures and practices, and records kept. The plan at a minimum shall contain at least daily monitoring of FS007-020. The plan will include a statement of objectives, fugitive emission sources, operating and control measures, dust suppressant application description, corrective actions, training, and records. The Commissioner may require additions or changes to the Fugitive Emission Control Plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.	Minn. R. 7011.0150
Fugitive Control Plan: Comply with the fugitive control plan. Follow the actions and recordkeeping specified in the fugitive control plan. The plan may be amended with the Commissioners approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, or fugitive control plan, then the Permittee may be required to amend the fugitive control plan. Prior to approval of the fugitive dust control plan the Permittee shall observe fugitive dust from FS007-020 at least once daily and take corrective action to control emissions in excess of Minn. R. 7011.0150.0	Minn. R. 7011.0150
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150

Facility Name: Mittal Steel USA - Minorca Mine Inc

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Contractors: The Permittee shall retain records on site of all contractors that are allowed on site that include any crushers, screens and conveyors. The Permittee shall also retain records on site of all contractors whose operations would require an Air Emissions Permit from the MPCA. The records shall include the contractors company name, MPCA air emissions permit number, short description of activities undertaken by the contractor, estimate of emissions or materials handled and the dates the contractor was on site. The record shall be updated in the month following any month when a contractor has operated at this facility.	Minn. R. 7007.0800, subp. 2
Contractors: The Permittee shall evaluate if the activities of any contractor require New Source Review (NSR) permitting prior to the contractor performing such activities. If a contractor has their own permit, but it is determined that the contractor is under the common control of the taconite plant then the contractors permit does not shield the taconite plant or the contractor from the NSR and Part 70 modification regulations or enforcement actions.	Minn. R. 7007.0800, subp. 2
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Performance Tests: Performance testing for EU021-035 (GP006-010) and their associated control equipment and stacks shall be tested at a fired pellet production rate of greater than or equal to 340 long tons per hour. If a performance test is conducted at less than the applicable minimum rate given above the Permittee shall be given the opportunity to retest within 90 days of the subject test before process limits can be applied as specified in Minn. R. 7017.2025, subpart 3. Once a process limit has been applied the Permittee may at any time conduct a voluntary performance test at or above the applicable minimum rate in order to remove the process limit.	Minn. R. 7017.2025
The performance testing for EU001-020 (GP001-005) and their associated control equipment and stacks shall be tested at greater than or equal to 90% of the emission units rated capacity. If a performance test is conducted at less than the applicable minimum rate given above the Permittee shall be given the opportunity to retest within 90 days of the subject test before process limits can be applied as specified in Minn. R. 7017.2025, subpart 3. Once a process limit has been applied the Permittee may at any time conduct a voluntary performance test at or above the applicable minimum rate in order to remove the process limit.	Minn. R. 7017.2025
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Breakdowns: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Shutdowns: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B, and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3

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Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, such as for system breakdowns, repairs, calibration checks, and zero and span adjustments (as applicable). If such a situation exists during the time when the process or monitoring parameter is normally recorded, the monitoring records shall identify the situation that precludes or invalidates that recording. The Permittee is not required to keep records of downtime unless the Permittee is normally required to make a recording of some operating or monitoring parameter during this situation.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Application for Permit Amendment: If you need a permit amendment, submit application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill	Minn. R. 7002.0005 through Minn. R. 7002.0095
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of the monitoring sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units.This is a state-only requirement and is not enforceable by the EPA Administrator, nor subject to the citizen suit provisions of section 304 of the Clean Air Act, 42 U.S.C. section 7604.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16	Minn. R. 7007.0800, subp. 16
DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NEW SOURCE REVIEW	hdr
These requirements apply where there is a reasonable possibility that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test and found to not be part of a major modification, may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project. Even though a particular modification is not subject to New Source Review, a permit amendment, recordkeeping, or notification may still be required under Minn. R. 7007.1150 - 7007.1500.	Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000

Facility Name: Mittal Steel USA - Minorca Mine Inc

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Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following information: 1. A description of the project 2. Identification of the emission unit(s) whose emissions of an NSR pollutant could be affected 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the potential emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the unit(s) could have accommodated during the baseline period, an explanation of why the amounts were excluded, and any creditable contemporaneous increases and decreases that were considered in the determination. The Permittee shall maintain records of this documentation.	Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5
The Permittee shall monitor the actual emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using the ATPA test, and the potential emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using potential emissions. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if used in the analysis) emissions of the regulated pollutant, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit of any unit associated with the project.	Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5
The Permittee must submit a report to the Agency if the annual summed (actual plus potential, if applicable) emissions differ from the preconstruction projection and exceed the baseline actual emissions by a significant amount as listed at 40 CFR Section 52.21(b)(23). Such report shall be submitted to the Agency within 60 days after the end of the year in which the exceedances occur. The report shall contain: a. The name and ID number of the facility, and the name and telephone number of the facility contact person b. The annual emissions (actual plus potential, if any part of the project was analyzed using potential emissions) for each pollutant for which the preconstruction projection and significant emissions increase are exceeded. c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection.	Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 001 Secondary Crushing**

Associated Items: CE 004 Venturi Scrubber

CE 005 Venturi Scrubber

EU 003 Secondary Crusher System

EU 004 Secondary Crusher System

EU 005 Secondary Crusher System

SV 004

SV 005

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE004 and CE005 once every day when in operation once the pressure gauges are installed. A deviation from the pressure drop range for either unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 6 inches of water column and less than or equal to 11.5 inches of water column for CE004 and CE005.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE004 and CE005 once every day when in operation once the scrubber water flow rate meters are installed. A deviation from the range for either unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 208 gallons/minute for CE004 and CE005.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Equipment Installation: due 180 days after 01/14/2000 CE004 and CE005 water flow rate and pressure drop monitor	Minn. R. 7007.0800, subp. 4(D)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Mittal Steel USA - Minorca Mine Inc

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Subject Item: **GP 002 Tertiary Crushing**

Associated Items: CE 006 Venturi Scrubber

CE 007 Venturi Scrubber

CE 008 Venturi Scrubber

EU 007 Tertiary Crusher System

EU 008 Tertiary Crusher System

EU 009 Tertiary Crusher System

EU 010 Tertiary Crusher System

SV 006

SV 007

SV 008

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE006, CE007 and CE008 once every day when in operation once the pressure gauges are installed. A deviation from the pressure drop range for any unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 6 inches of water column and less than or equal to 11.5 inches of water column for CE006, CE007 and CE008.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE006, CE007 and CE008 once every day when in operation once the scrubber water flow rate meters are installed. A deviation from the range for any unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 208 gallons/minute for CE006, CE007 and CE008.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 003 Fine ore drop, underfeed & inter. conveyor**

Associated Items: CE 009 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 010 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 006 Outside Ore Transfer

EU 011 Fine Ore Drop Onto Two Underfeed Belts

EU 012 Fine Ore Drop Onto Intermediate Conveyor

SV 009

SV 010

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV009 & 010 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure drop: Monitor and record for CE009 and CE010 once every day when in operation once the pressure gauges are installed. A deviation from the pressure drop range for either unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 8 inches of water column for CE009 and CE010.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 004 Fine ore drop, rod mill material handling**

Associated Items: CE 011 Venturi Scrubber

EU 013 Fine Ore Drop Onto Rod Mill Bin Conveyor

EU 014 Fine Ore Drop Onto Rod Mill Bin Feeder

EU 015 Fine Ore Drop Into Rod Mill Bin

EU 016 Fine Ore Drop Onto Internal Conveyors

EU 017 Fine Ore Drop Into Rod Mills

SV 011

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE011 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 6 inches of water column and less than or equal to 11.5 inches of water column for CE011.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE011 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 208 gallons/minute for CE011.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 005 Binder shift bins and blending**

Associated Items: CE 013 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 019 Binder Transfer to Binder Shift Bins

EU 020 Binder Blending

SV 013

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV013 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure Drop: Monitor and record for CE013 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 6 inches of water column for CE013.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 006 Pellet hearth layer conveyor, bin and gratefeed**

Associated Items: CE 019 Wet Scrubber-Medium Efficiency w/o Lime

EU 021 Pellet Drop Onto Internal Hearth Layer Conveyor

EU 022 Drop Into Hearth Layer Bin

EU 023 Grate Feed

SV 019

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE019 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 4 inches of water column for CE019.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE019 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 112 gallons/minute for CE019.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 007 Pellet HL Screen & Convy. to HL Bin**

Associated Items: CE 020 Wet Scrubber-Medium Efficiency w/o Lime

EU 024 Drop Into Hearth Layer Screen

EU 025 Drop Onto Conveyor to Hearth Layer Bin

SV 020

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE020 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 4 inches of water column for CE020.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE020 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 112 gallons/minute for CE020.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
C. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 008 Machine Discharge & Conveyor to Spl.Bin**

Associated Items: CE 018 Wet Scrubber-Medium Efficiency w/o Lime

EU 027 Machine Discharge

EU 028 Drop Onto Conveyor to Pellet Splitter Bin

SV 018

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE018 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 4 inches of water column for CE018.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE018 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 320 gallons/minute for CE018.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 009 Drop into Spl. Bin & into Prod. Spl. Bin Conv.**

Associated Items: CE 021 Wet Scrubber-Medium Efficiency w/o Lime

EU 029 Drop Into Pellet Splitter Bin

EU 030 Drop Onto Product Splitter Bin Conveyors

SV 021

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE021 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 4 inches of water column for CE021.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE021 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 112 gallons/minute for CE021.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 010 Fluxstone Crushing and Handling**

Associated Items: EU 034 Fluxstone crushing

EU 035 Fluxstone handling

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.05 grams/dry standard cubic meter . This emission limit applies individually to all emission units in this group.	40 CFR pt. 60.672 (a)(1)
Opacity: less than or equal to 7 percent opacity , unless the stack emissions are discharged from an affected facility using a wet scrubbing control device. Facilities using a wet scrubber must comply with the reporting provisions contained in 40 CFR Part 60.676(c)(d) and (e).	40 CFR Part 60.672(a)(2)
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. This emission limit applies individually to each emission unit in this group. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity . This emission limit applies individually to each emission unit in this group.	Minn. R. 7011.0715, subp. 1(B)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **GP 011 Fugitive Sources**

Associated Items: FS 007 PM10 - Haulage Truck Operation

FS 008 PM10 - Tailings Truck Operation

FS 009 PM10 - Wind Erosion of Laurentian Pit Waste Rock and Overburden Dump

FS 011 PM10 - Wind Erosion of Tailings Basin Beach

FS 012 PM10 - Ore Dump Into Primary Crusher

FS 013 PM10 - Coarse Ore Pile Drop

FS 014 PM10 - Wind Erosion of Coarse Ore Pile

FS 015 PM10 - Fine Ore Pile Drop

FS 016 PM10 - Wind Erosion of Fine Ore Pile

FS 017 PM10 - Taconite Pellet Pile Drop

FS 018 PM10 - Wind Erosion of Taconite Pile

FS 019 PM10 - Pellet Loadout Drop

FS 020 PM10 - Wind Erosion of Fluxstone Pile

What to do	Why to do it
Fugitive Control Plan: Comply with the Fugitive Control Plan. Follow the actions and recordkeeping specified in the Fugitive Control Plan. The plan may be amended with the Commissioners approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, or Fugitive Control Plan, then the Permittee may be required to amend the Fugitive Control Plan. Prior to approval of the Fugitive Control Plan the Permittee shall observe fugitive emissions from FS007-020 at least once daily and take corrective action to control emissions in excess of Minn. R. 7011.0150.0	Minn. R. 7011.0150

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 001 Primary Crusher System**

Associated Items: CE 001 Venturi Scrubber

CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 001

SV 002

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV002 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure drop: Monitor and record for CE001 and CE002 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range for either unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 6 inches of water column and less than or equal to 11.5 inches of water column for CE001.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 8 inches of water column for CE002.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE001 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 80 gallons/minute for CE001.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
C. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 002 Drop Onto Coarse Ore Pile Conveyor**

Associated Items: CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 003

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV003 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure drop: Monitor and record for CE003 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 8 inches of water column for CE003.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 018 Binder Transfer to Storage Silo**

Associated Items: CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 012

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV012 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure drop: Monitor and record for CE012 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 6 inches of water column for CE012.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 026 Indurating Machine**

Associated Items: CE 014 Venturi Scrubber

CE 015 Venturi Scrubber

CE 016 Venturi Scrubber

CE 017 Venturi Scrubber

SV 014

SV 015

SV 016

SV 017

What to do	Why to do it
A. POLLUTANT/PROCESS LIMITS	hdr
Nitrogen Oxides: less than or equal to 1088 lbs/hour . The sum of the NOx emissions from all four stacks (SV014-017) shall not exceed 1088 lbs/hour.	40 CFR pt. 52.21 BACT
Fuel Usage: less than or equal to 270 million Btu's/hour (primary+auxiliary burners total). The primary burners (firing zone burners) may only burn natural gas and #2 fuel oil. The auxiliary burners (preheat burners) may only burn natural gas.	40 CFR pt. 52.21 BACT
Volatile Organic Compounds: less than or equal to 9.1 lbs/hour	To keep the 1987 modification minor for 40 CFR pt. 52.21
Carbon Monoxide: less than or equal to 37.2 lbs/hour using 3-hour Average	To keep the 1987 modification minor for 40 CFR pt. 52.21
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0610, subp. 1(A)(1) & Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0610, subp. 1(A)(1) & Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity except for one six-minute period within any one-hour period of up to 60 percent opacity.	Minn. R. 7011.0610, subp. 1(A)(2)
Sulfur Dioxide: less than or equal to 2 lbs/million Btu heat input when a liquid fossil fuel is burned.	Minn. R. 7011.0610, subp. 2(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE014-017 once every day when in operation once the pressure gauges are installed. A deviation from the pressure drop range for any unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 4 inches of water column and less than or equal to 9 inches of water column for CE014, CE015, CE016, and CE017.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE014-017 once every day when in operation once the scrubber water flow rate meters are installed. A deviation from the range for any unit shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 1097 gallons/minute for CE014, CE015, CE016, and CE017.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
D. PERFORMANCE TESTING REQUIREMENTS (NOX)	hdr
Performance Test: due before end of each calendar 24 months starting 06/29/2005	Minn. R. 7017.2020, subp. 1
If the average total NOx emission rate from SV014-017 exceeds (1033.6 lb/hr) 95% of the NOx emission limit in any 12 month period, the Permittee will submit a plan for Agency review and approval within 120 days of the most recent performance test to implement further monitoring that is technically and economically feasible based on current technologies. This monitoring could include Continuous Emission Monitors (CEMS), Parametric Emission Monitoring (PEMS) or other parametric monitoring which would allow the Permittee and the Agency to reliably and accurately determine the NOx emissions from SV014-017.	Minn. R. 7007.0800, subp. 2; 7017.1000, subp. 1

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

If the BTU/Long Ton of Pellets exceeds 550,000 BTU/long tons of pellets based on a 12 month rolling average the Permittee shall perform a NOx performance test within 120 days of the exceedence. This rolling average will exclude days where the ambient temperatures are less then -20 degrees fahrenheit at the nearest weather station. This rolling average will also exclude days where the furance is in a start up mode and the production during start up is less than 250 long tons of pellets per hour.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Performance Test for NOx	Minn. R. 7017.2030, subp. 4

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 031 Drop In PI-P2 Transfer House**

Associated Items: CE 024 Wet Scrubber-Medium Efficiency w/o Lime

SV 024

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Gas Stream Pressure drop: Monitor and record for CE024 once every day when in operation once the pressure gauge is installed. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 4 inches of water column for CE024.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water Flow Rate: Monitor and record for CE024 once every day when in operation once the scrubber water flow rate meter is installed. A deviation from the range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Water flow rate: greater than or equal to 25 gallons/minute for CE024.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
C. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 032 Drop Onto P3 Pellet Pile Underfeed Conveyor**

Associated Items: CE 028 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 022

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains per dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) for SV022 once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Gas Stream Pressure drop: Monitor and record for CE022 once every day when in operation once the pressure gauge is installed. Once the pressure drop parameter range for this unit is established it become an enforceable part of this permit. A deviation from the pressure drop range shall trigger a corrective action as detailed in the O&M plan.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Pressure Drop: greater than or equal to 4 inches of water column and less than or equal to 6 inches of water column for CE028.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 033 Pellet Loadout Bin Transfer Point**

Associated Items: CE 023 Dust Suppression by Water Spray

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 036 Emergency Generator**

Associated Items: CE 026 Other

SV 026

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input unless an alternative limit is established in an air emission permit after demonstration through modeling of compliance with the sulfur dioxide standards in part 7009.0080.	Minn. R. 7011.2300, subp. 2

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Subject Item: **EU 037 Emergency Fire Pump**

Associated Items: CE 027 Other

SV 027

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input unless an alternative limit is established in an air emission permit after demonstration through modeling of compliance with the sulfur dioxide standards in part 7009.0080.	Minn. R. 7011.2300, subp. 2

TABLE B: SUBMITTALS

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:
- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Attainment Demonstration Plan	due 90 days after Computer Dispersion Modeling Results The attainment demonstration plan is due 90 days after the refined modeling results are submitted if the refined modeling results do not demonstrate attainment with the NAAQS and MAAQS. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling.	Total Facility
Computer Dispersion Modeling Results	due before 10/01/2008. The modeling required by this condition is the refined modeling.	Total Facility
Performance Test Notification (written)	due 30 days before Initial Performance Test	EU001, EU031, GP007
Performance Test Notification (written)	due 30 days before Performance Test for NOx	EU026
Performance Test Plan	due 30 days before Initial Performance Test	EU001, EU031, GP007
Performance Test Plan	due 30 days before Performance Test for NOx. The plan must contian detailed information on what furnace operating parameters will be monitored during the actual performance test runs. Every effort should be made to collect furnace operating parameter data during the actual runs instead of using daily averages.	EU026
Performance Test Report - Microfiche Copy	due 105 days after Initial Performance Test	EU001, EU031, GP007
Performance Test Report - Microfiche Copy	due 105 days after Performance Test for NOx	EU026
Performance Test Report	due 45 days after Initial Performance Test	EU001
Performance Test Report	due 45 days after Initial Performance Test	EU031
Performance Test Report	due 45 days after Initial Performance Test	GP007
Performance Test Report	due 45 days after Performance Test for NOx	EU026
The Permittee shall complete the monitoring equipment debugging and establishment of parameter ranges for normal operation and provide the parameter ranges along with rationale of their development in a permit amendment application submittal to incorporate the parameter ranges into this permit. The rationale for choosing these ranges shall include the control equipment manufacturer's suggested ranges and any reasons for deviating from the manufacturer's recommendations. The permit amendment application Submittal	due 365 days after 01/14/2000 The Permittee shall complete the monitoring equipment debugging and establishment of parameter ranges for normal operation and provide the parameter ranges along with rationale of their development in a permit amendment application submittal to incorporate the parameter ranges into this permit. The rationale for choosing these ranges shall include the control equipment manufacturer's suggested ranges and any reasons for deviating from the manufacturer's recommendations. The permit amendment application	GP001

TABLE B: RECURRENT SUBMITTALS

Facility Name: Mittal Steel USA - Minorca Mine Inc

Permit Number: 13700062 - 002

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 01/14/2000	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 01/14/2000 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 13700062-002

This Technical Support Document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 1011)
Mittal Steel USA 1 South Dearborn Street Chicago, IL 60603	Mittal Steel USA – Minorca Mine Inc. 5950 Old Highway 53 North Virginia, MN St. Louis County
Contact: Gustav R, Josephson Phone: 218-749-5910	

1.2. Description of the Permit Action

Mittal Steel USA – Minorca Mine Inc. (formerly Ispat Inland Mining Company) owns and operates a taconite pellet production plant. There are three main areas where emissions are created and these are the mine, tailings basin and pellet plant. Emissions from the mine are fugitive emissions created from blasting, coarse ore loading and unloading, overburden loading and unloading and haul truck traffic on unpaved roads and are primarily Particulate Matter (PM) and Particulate Matter less than 10 microns (PM_{10}). This permit authorizes Mittal Steel USA open the East Reserve, a new open pit mine. The opening of the mine will extend the life of the existing Minorca ore processing facility through the year 2024. This permit authorizes no other changes at the pellet plant or tailings basin. Therefore, emissions from the other two main areas of emissions will not change. The Permittee will utilize existing mobile equipment that will be moved from the existing Laurentian mine to the East Reserve mine. However, the existing haul trucks will be replaced with new haul trucks that are slightly larger, this will decrease the vehicle mile traveled annually and therefore also reduce road emissions.

1.3 Description of the Activities Allowed by this Permit Action

This is a minor amendment to the Mittal Steel USA air emission permit authorizing the opening of East Reserve mine. This action authorizes no increase in pellet production. This action is part of an Environmental Impact Statement (EIS) for the opening of the East Reserve mine. The US Army Corp of Engineers and the Minnesota Department of Natural Resources are the responsible governmental units (RGUs) for the joint federal, state EIS. This action also incorporates control parameters established during recent performance tests as required under a Permit No. 13700062-001; this action also changes the name from Ispat Inland Mining Company to Mittal Steel USA – Minorca Mine Inc.

1.4. Facility Emissions:

Table 1. Emissions Change Summary

Pollutant	Emissions Increase from the Modification (tpy)**	PSD/112(g) Significant Thresholds for major sources	NSR/112(g) Review Required? (Yes or No)
PM	- 303	25	No
PM_{10}	- 83	15	No
NO_x	0	40	No
SO_2	0	40	No
CO	0	100	No
Ozone (VOC)	0	40	No
Lead	0	0.6	No
Individual and total HAPs	0	10/25	No

* Other emission changes during the contemporaneous period as defined by 40 CFR § 52.21, 40 CFR § 52.24 or 40 CFR pt. 51

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	X		
Part 70 Permit Program	X		
Part 63 NESHAP	X		

2. Regulatory and/or Statutory Basis

New Source Review

The facility is an existing major source under New Source Review regulations. No changes are to Title 1 conditions are authorized by this permit.

Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

Portions of the facility are subject to the Standards of Performance for Metallic Mineral Processing Plants (40 CFR Part 60 subpart LL).

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is subject to the National Emission Standard for Hazardous Air Pollutants: Taconite and Iron Ore Processing (40 CFR Part 63 subpart RRRRR).

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

3. Technical Information

The permit authorizes the opening of the East Reserve mine and discontinued use of the Minorca mine. Because no changes, other than the location of the mining activity, are authorized under this permit, no emission changes other than those associated with the mining activity are allowed. Because the location of the mining activity is not a condition of the permit and has not been the subject of modeling used to demonstrate compliance with the NAAQS or MAAQS, a change in that location is not a modification.

The permit application included emission estimates at the rates of lb/hr as well as tons per year. The Permittee submitted a Past Actuals to Projected Actuals analysis for PM and PM_{10} comparing the past actual emissions (1996 through 2005) to projected future actual emissions (2007 through 2011). The permittee compared the highest two-year average emission rate (1998 and 1999) to projected future actual emissions of PM and PM_{10}. The smallest estimated

decreases of 83 tpy and 303 tpy in emissions of PM and PM_{10} respectively are expected to occur in 2011. The Permittee submitted in the application estimates of past actual and projected future actual Vehicle Miles Traveled (VMT) for mine vehicles. As a result of shorter haul distances (primarily overburden/waste rock hauls) and mine vehicle fleet changes to larger vehicles, past actual to projected future actual VMT decreases by 16 percent on average. The only pollutants affected by the change are PM and PM_{10}.

Delta shows an increase in emissions for some activities (FS002, 003, 004, 007, and 009). However, that is due to changes in emission factors used to estimate emissions. Calculations performed to compare past actual emissions to projected future actual emissions, as established under 40 CFR § 52.21 used the same, current emission factors and represent the best estimate of emissions. These emission factors were used in making applicability determinations based on emission rate changes. Emission estimates of small vehicle traffic, which were not included in Permit No. 13700062-001, have been added to Delta. These emissions units (FS023) were added under the first emissions inventory entered into Delta. Therefore these are not new emissions that need to be counted as an increase in emissions.

Fugitive emissions units FS003 and FS005 (Overburden and Waste Rock Loading) were combined as were FS004 and FS006 (Overburden and Waste Rock Dumping). Fugitive emissions unit FS010 (Wind Erosion of Minorca Pit Waste Rock and Overburden Dump) is retired and FS025 (Wind Erosion of East Reserve Pit Waste Rock and Overburden Dump) replaces it. Mittal Steel also replaced CE023 (baghouse) for EU032 (Drop onto P3 Pellet Pile Underfeed Conveyor) with CE028 (baghouse). Because this is a like-kind replacement, the permit notes the change.

3.1 Calculations of Potential to Emit

Emission calculations, including calculations of emission changes are attached to this TSD.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements. The permit authorizes the opening of the East Reserve mine and discontinued use of the Minorca mine. Because no changes, other than the location of the mining activity, are authorized under this permit, no emission changes other than those associated with the mining activity are allowed. Therefore, no additional monitoring is required.

3.3 Insignificant Activities

The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The permit authorizes the opening of the East Reserve mine and discontinued use of the Minorca mine. Because no changes, other than the location of the mining activity, are authorized under this permit, no emission changes other than those associated with the mining activity are allowed. No additional insignificant activities were included in the submitted permit application.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements.

3.5 Comments Received

EPA 45-day Review Period: December 15, 2006 – January 29, 2007. No comments were received.

This permit is not subject to public notice.

4. Conclusion

Based on the information provided by Mittal Steel USA, the MPCA has reasonable assurance that the operation of the emission facility, as described in the Air Emission Permit No. 13700062-002, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Mike Mondloch (permit writer/engineer)
Bob Beresford (enforcement)
Andrew Place (stack testing)
Dick Cordes (peer reviewer)

Attachments:
1. Calculation Spreadsheets
2. Facility Description and CD-01 Forms

Attachment 1
Calculation Spreadsheets

Attachment 2
Facility Description and CD-01 Forms