



July 25, 2025

VIA ELECTRONIC MAIL

Andrew Belt
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Re: Public Comments on the Renewal of the Administrative Part 70 Operating Permit for South Shore Slag, LLC, contractor of U.S. Steel Corporation – Gary Works; Permit No.: T089-48656-00133.

Dear Mr. Belt,

The Environmental Law & Policy Center (“ELPC”), along with Just Transition Northwest Indiana, Conservation Law Center, Northern Lake County Environmental Partnership, and Abrams Environmental Law Clinic (collectively, “Commenters”) respectfully submit the following comments on the above-referenced Draft “Administrative” Part 70 Operating Permit Renewal, No. T089-48656-00133 (“Draft Permit”) issued by the Indiana Department of Environmental Management (“IDEM” or “Department”) to South Shore Slag, LLC, contractor of U.S. Steel Corporation, for the stationary operations it conducts at U.S. Steel Gary Works in Lake County. The South Shore Slag facility (“Facility”) is a slag crushing, screening, and conveying facility in Gary, Indiana that emits substantial amounts of pollution and is a Title V Major Source.¹ The facility is a contractor for the U.S. Steel Gary Works steel mill (IDEM Source ID 089-00121).

ELPC is the Midwest’s leading environmental legal advocacy organization. Its mission is to ensure that all people have healthy clean air to breathe, safe clean water to drink, and can live in communities without toxic threats, especially in the Great Lakes region. As part of this work, ELPC focuses on industrial pollution along the Indiana lakeshore, seeking to make industry comply with the environmental regulations to reduce pollution and improve the landscape where people live, work, and play. We appreciate the opportunity to make these public comments.

¹ South Shore Slag Draft Administrative Part 70 Operating Permit (“Draft Permit”), https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=83819482&dDocName=83823525.

Note: The Draft Permit is part of one 314-page PDF file provided by IDEM that contains multiple individually-paginated documents. The Draft Permit begins on PDF page 3 of 314 of that file.

COMMENT 1: IDEM's Lack of Justification to Issue an Administrative Permit.

This permitting action is purported to be a renewal of an Administrative Part 70 Operation Permit. However, IDEM provides no explanation in the Draft Permit or TSD for how an “administrative” Part 70 permit is defined or how it differs from a normal Part 70 permit. Neither Indiana’s State Implementation Plan (“SIP”) nor any other Indiana regulations appear to authorize IDEM to issue these permits.² IDEM’s practice of separately permitting U.S. Steel Gary Works and its various contractors as “administrative only” and Part 70 permits is inconsistent, unclear, and fails to satisfy the requirements of Title V. IDEM must explain its rationale and authority for issuing a “Part 70 permit” to U.S. Steel Gary Works (Source ID 089-00121) while only issuing “administrative” permits to the various contractors “solely for administrative purpose.”³ This is especially true where the Title V permit recently issued to Gary Works, No. T089-46943-00121, addresses only the applicable requirements for operation of the steel mill and not the applicable requirements for its various contractors, such as this slag Facility.⁴

COMMENT 2: The Draft Permit must include a Statement of Basis.

Clean Air Act regulations (40 CFR § 70.7(a)(5)) require IDEM to “provide a statement that sets forth the legal and factual basis for the draft permit conditions (including references to the applicable statutory or regulatory provisions).” Normally referred to as a Statement of Basis, it must be provided to the public during the comment period, and is a separate document from the permit that must “include a discussion of decision-making that went into the development of the Title V permit and to provide the permitting authority, the public, and the USEPA a record of the applicability and technical issues surrounding issuance of the permit.”⁵ In addition to discussing monitoring and operational requirements, the statement of basis must identify all applicability and exemption determinations, and “include the rationale for such a determination and reference any supporting materials relied upon in the determination.”⁶ Finally, it should include attainment status, permitting history, and “[c]ompliance history including inspections, any violations noted, a listing of consent decrees into which the permittee has entered and corrective action(s) taken to address noncompliance.”⁷

² 326 IAC 2, Rule 7. *See* Clean Air Act Final Approval of Operating Permit Program Revisions; Indiana, 67 Fed. Reg. 34844 (May 16, 2002).

³ Technical Support Document for a Part 70 Administrative Operating Permit Renewal (“TSD”) at 1. Note: The TSD is part of one 314-page PDF file provided by IDEM that contains multiple individually-paginated documents. The TSD begins on PDF page 244 of 314 of that file.

⁴ *See generally*, U.S. Steel - Gary Works Part 70 Operating Permit Renewal, No. T089-46943-00121 (May 7, 2025), <https://permits.air.idem.in.gov/46943f.pdf> (for example, identifies emission units and associated requirements for various slag activities owned and operated by U.S. Steel, but not any emission units and requirements for the slag crushing, screening, and conveying done by South Shore Slag, LLC).

⁵ 40 C.F.R. 70.7(h)(2); Letter from U.S. EPA Region V to Ohio EPA, (Dec. 20, 2001) at 1 [hereinafter the “USEPA Region V Letter”] <https://www.epa.gov/sites/default/files/2015-08/documents/sbguid.pdf> (providing guidelines on the content of an adequate statement of basis). *See also In the Matter of Midwest Generation, LCC Waukegan Generating Station*, Order on Petition Number V-2004-5 (Sept. 22, 2005).

⁶ USEPA Region V Letter at 2.

⁷ *Id.* at 3.

The Draft Permit does not contain any designated “Statement of Basis.” To the extent IDEM believes that the TSD can serve as a Statement of Basis, the Department is incorrect. The TSD only “sets forth the legal and factual basis for a draft Part 70 permit conditions (including references to the applicable statutory or regulatory provisions).”⁸ The TSD does not include multiple required elements of the Statement of Basis, including permitting and compliance history. The TSD does include a section on enforcement, but it merely states “[t]here are no enforcement actions pending”⁹; it does not address compliance history. Likewise, the section on “Existing Approvals” addresses recent permitting history but does not provide a complete history identifying all underlying permits that could contain applicable requirements for this Facility.¹⁰ IDEM must provide a Statement of Basis that addresses all required elements for public review and comment before issuing the Final Permit.

COMMENT 3: IDEM must ensure the emissions limits are enforceable.

Pursuant to 42 U.S.C § 7661c(a) and 40 C.F.R. § 70.6(a)(1), Title V Permits issued by IDEM must include “enforceable emission limitations and standards,” and other conditions that “are necessary to assure compliance with applicable requirements.” Thus, in addition to emissions limits, IDEM must include all monitoring, reporting, and recordkeeping requirements to assure compliance with such limits and other applicable standards.¹¹ However, IDEM has failed to include the requisite standards and conditions in this permit that will ensure the Facility can comply with the applicable requirements in this permit. The permit fails to ensure that the PM, PM₁₀, and PM_{2.5} limits in Sections D.1 through D.4 are practically enforceable.

a. Conditions D.1.4, D.2.3, and D.4.2

Conditions D.1.4, D.2.3, and D.4.2 sets emissions limits for particulate matter (PM) for several emissions units and associated equipment. IDEM lists the following PM limits in the Draft Permit:

D.1.4 - Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), particulate emissions from feeding, screening, crushing, conveying, milling, and magnet operations shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.¹²

D.2.3 - Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), particulate emissions from the emission units listed in Conditions D.2.1(b), D.2.1(d), and D.2.1(e), and the magnet, identified as Mag-1, shall not exceed 0.03 grains per dry standard cubic foot (dscf), each.¹³

⁸ 316 IAC 2-7-8(d)(1).

⁹ TSD at 7.

¹⁰ *Id.* at 1-2.

¹¹ 42 U.S.C. § 7661c(c); 40 C.F.R. § 70.3(a)(3).

¹² Draft Permit at 41.

¹³ *Id.* at 46.

D.4.2 - Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), particulate matter emissions from the feeders, crushers, screens, conveyors, magnets, and the diesel-fired engine, identified as CAT3412, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03)) grain per dry standard cubic foot (dscf), each.¹⁴

Although IDEM lists these numeric limits, the Draft Permit fails to include conditions necessary to demonstrate compliance with them. No other conditions in Section D.2 even discuss, much less provide methods for determining compliance with, the limit in Condition D.2.3. For Conditions D.1.4 and D.4.2, the Draft Permit states that compliance with the limits will be demonstrated with wet suppression that “shall be applied in a manner and at a frequency sufficient to ensure compliance” with these limits.¹⁵ However, this language is vague, circular, and unenforceable. Moreover, the other conditions in Sections D.1, D.2, and D.4 fail to include any recordkeeping or reporting requirements to address the PM limits for these units. To the extent IDEM intends to rely on Conditions D.1.8(d) and D.1.9 to address these requirements, they are insufficient because they simply refer back the Permittee’s obligations under the Section C of the Draft Permit and Section C only requires recordkeeping and reporting as required by specific provisions of the Permit.¹⁶ IDEM must include monitoring, recordkeeping, and reporting requirements that apply to and assure compliance with the PM emission limits in Conditions D.1.4, D.2.3, and D.4.2.

b. Conditions D.2.1 and D.2.2

Conditions D.2.1 and D.2.2 set emissions limits for the equipment associated with the Vitra Plant emission unit and are designed to help the Facility evade Prevention of Significant Deterioration (“PSD”) requirements under 326 IAC 2-2.¹⁷ EPA has specifically instructed that where limits such as these PM limits are used to avoid otherwise applicable permitting requirements, the Title V permit “must include sufficient terms and conditions such that the source cannot lawfully exceed the limit,” and be supported by testing, monitoring, recordkeeping, and reporting requirements that are “sufficient to enable regulators and citizens to determine whether the limit has been exceeded and, if so, to take appropriate enforcement action.”¹⁸ However, the remaining conditions in Section D.2 are insufficient to assure compliance with and potential enforcement of these Conditions.

¹⁴ *Id.* at 53.

¹⁵ *Id.* at 41 (Condition D.1.6(c)) and 53 (Condition D.4.4).

¹⁶ Compare *id.* at 42, Conditions D.1.8(d) and D.1.9 (cross referencing the requirements of Section C) and 32-36, Section C (requiring reporting only of specific information required elsewhere in the permit plus general certifications of compliance without reporting of the information underlying those determinations).

¹⁷ *Id.* at 41-46.

¹⁸ *In the Matter of Yuhuang Chemical, Inc.* (Aug. 31, 2016), https://www.epa.gov/sites/default/files/2016-09/documents/yuhuang_response2015_0.pdf (“Yuhuang Order”), at 14; *In the Matter of Orange Recycling and Ethanol Production Facility, Pencor-Masada Oxynol, LLC*, (Apr. 8, 2002), (“Pencor-Masada Order”), at 7.

First, the Draft Permit fails to include sufficient monitoring to assure compliance with the numeric PM limits in Condition D.2.1 and D.2.2. Condition D.2.5 states that compliance with these conditions shall be demonstrated by use of baghouses and dust collectors when the Vitra Plant is in operation, and Condition D.2.7 requires parametric monitoring of the baghouses. While baghouse differential pressure readings may be suitable as a general indicator of baghouse operations, they are not sufficient to address compliance with numeric PM limits because they are influenced by many factors (such as dust load, cleaning system performance, and air volume). Condition D.2.6 requires use of wet suppression, but contains the same vague, circular, and unenforceable language discussed above that requires use of suppression as needed to ensure compliance.¹⁹ Finally, Condition D.2.9 requires visible emission notations without specifying how visible emissions correlate with the specific numeric emission limits and contain vague, unenforceable terms such as "normal or abnormal" emissions.²⁰ Particularly if the "trained employee" making such observations is trained during a period in which any non-zero amount of emissions are "normal," it's not clear how such observations ensure the Facility is not exceeding the specific numeric PM emission limits at issue.

Second, the recordkeeping or reporting requirements of conditions D.2.10 and D.2.11 are insufficient with regard to the PM emission limits in Conditions D.2.1 and D.2.2. Conditions D.2.10 and D.2.11 only address the throughput limit in D.2.1(c); they completely fail to list any requirements to document or report the various PM "monitoring" discussed above, nor do they require reporting of the Facility's compliance with these specific PM emissions limitations.²¹

Taken as a whole, the Draft Permit fails to include sufficient monitoring, recordkeeping, and reporting requirements to assure compliance with the numeric PM emission limits applicable to Vitra Plant emission unit. IDEM must revise the Draft Permit to require sufficient monitoring of these numeric PM emission limits and accompanying recordkeeping and reporting that will allow IDEM, EPA, and the public to determine whether the Facility complies with the limits in D.2.1 and D.2.2 and to take enforcement action if necessary.

c. Conditions D.1.1, D.1.2, D.1.3, and D.4.1

Conditions D.1.1, D.1.2, D.1.3, and D.4.1 set forth numeric PM emissions limits, as well as throughput and fugitive dust requirements, for the Slag Crushing, Screening, and Conveying Plants No. 1 and No. 2, respectively.²² The Draft Permit specifies that these conditions allow the Facility to evade the otherwise applicable requirements for PSD controls and Emission Offsets for PM emissions at these units. As noted above, when limits are used to evade otherwise applicable requirements, the Title V permit must include sufficient terms that restrict the source from

¹⁹ Draft Permit at 47.

²⁰ *Id.* at 47-48.

²¹ *Id.* at 48. As discussed above, IDEM cannot rely on references to the general recordkeeping and reporting of Section C as evidence of adequate recordkeeping and reporting because they do not require reporting of information not otherwise required by the Permit. *See* Comment 3.a, *supra*.

²² *Id.* at 39-41 and 52-53.

exceeding the applicable emission thresholds and accompanying testing, monitoring, recordkeeping, and reporting requirements to ensure compliance with and enforcement of those limits by regulators and citizens.²³ The Draft Permit fails to meet these requirements. The compliance provisions accompanying these PM limits are insufficient because they contain the same vague, circular, and unenforceable requirements as discussed above—wet suppression “applied in a manner and at a frequency sufficient to ensure compliance” with the emission limits and visible emissions notions of “normal or abnormal” emissions.²⁴ And neither IDEM nor the Draft Permit explain how these provisions correlate to compliance with the numeric PM emission limits in Conditions D.1.1, D.1.2, D.1.3, and D.4.1.

Likewise, the Record Keeping Requirements in Conditions D.1.8 and D.4.6 are insufficient. These Conditions only require records of slag inputs and the visible emission notations.²⁵ The Draft Permit does not require the Facility to keep record of or otherwise report any “monitoring” related to the numeric PM emission limits, and Condition D.4.6 does not even mention compliance with Condition D.4.1 (b).²⁶ In the TSD, IDEM simply recites these monitoring requirements but does not explain how slag inputs and visible emission monitoring will assure compliance with these numeric PM limits.²⁷ Without necessary recording and reporting, it is impossible for IDEM, EPA, or the public to determine whether the Facility is complying with the numeric PM emission limits in Condition D.4.1 and take enforcement action as necessary. Accordingly, IDEM must revise Section D.4.6 to include monitoring, recordkeeping, and reporting requirements sufficient to assure compliance with the numeric PM emission limits in Conditions D.1.1, D.1.2, D.1.3, and D.4.1.

COMMENT 4: IDEM should consider other monitoring options to identify opacity or PM issues rather than visible emissions monitoring.

Conditions D1.1 through D.1.4 and D4.1 through D4.2 contain numeric PM limits, as well as throughput, fugitive dust control, and NO_x limits, for the Slag Crushing, Screening, and Conveying Plant No. 1 and No. 2 respectively.²⁸ Conditions D.1.7 and D.4.5 set forth the only “Compliance Monitoring Requirements” for these units.²⁹ These monitoring provisions allow for South Shore Slag to use visible emissions notations to verify whether emissions are “normal or abnormal” at the aforementioned units.³⁰ However, as discussed in the comments above, this vague requirement is not relevant or useful in monitoring compliance with numerical opacity standards. Visible emission notations are not a substitute for PM/PM₁₀/PM_{2.5} monitoring. The Permit must

²³ *Yuhuang Order* at 14; *Pencor-Masada Order* at 7.

²⁴ *Id.* at 41, Conditions D.1.6 and D.1.7, and 53, Conditions D.4.4 and D.4.5; *see also* Comments 3.a. and 3.b., *supra*.

²⁵ *Id.* at 42 and 54.

²⁶ *Id.* at 42 and 54 (only addressing Conditions D.4.1(a) and (e)). As discussed above, IDEM cannot rely on references to the general recordkeeping and reporting of Section C as evidence of adequate recordkeeping and reporting because they do not require reporting of information not otherwise required by the Permit. *See* Comment 3.a, *supra*.

²⁷ TSD at 24-25.

²⁸ Draft Permit at 39-41 and 51-52.

²⁹ *Id.* at 41, 53.

³⁰ *Id.*

contain objective and meaningful compliance monitoring methods. IDEM needs to consider other monitoring options including:

- Method 22 testing
- Method 9 testing
- Monitoring another parameter – for instance, in NSPS OOO, the regular monitoring for systems using wet suppression relies upon inspections of nozzles on a regular basis to ensure wet suppression is being applied consistently and evenly.

COMMENT 5: IDEM Must Revise the Draft Permit to Require Adequate Monitoring to Assure Compliance with the Sitewide Opacity Limits.

Section C establishes an opacity limit for the entire source.³¹ Condition C.1 provides that opacity shall not exceed an average of 20% in any one six-minute average period or exceed 60% for more than a cumulative total of fifteen minutes in a six-hour period.³² The Draft Permit fails, however, to specify how the permittee should demonstrate compliance with the 20% opacity limit. Opacity provides immediate and obvious visible evidence that pollutants, including fine particulates, are being released from emission units. Opacity has long been recognized as a useful surrogate for emissions of specific pollutants that are difficult to monitor on a continuous basis. Accordingly, IDEM must revise the Draft Permit to specify monitoring requirements to assure compliance with the 20% opacity limit that are accurate and frequent enough to determine when the limit has been exceeded.

The Draft Permit allows the Facility to establish compliance with the other opacity limit (60% for more than a cumulative total of fifteen minutes in a six-hour period) through Method 9 or continuous opacity monitoring (“COMs”).³³ It is unclear if South Shore Slag is using both methods at all times, some combination thereof, or just one of the two. This lack of clarity alone makes the provision insufficient because it prevents IDEM, EPA, and the public from knowing which method should be used to determine the Facility’s compliance with the 60% opacity limit. IDEM must revise the Draft Permit to specify when and how Method 9 and/or COMs can be used to determine compliance with the 60% opacity limit.

COMMENT 6: IDEM Must Include Required Plans in the Permit.

The Draft Permit includes several plans that IDEM is required to implement or comply with by the terms of the Permit, but aside from the Fugitive Dust Control Plan contained in Attachment A,³⁴ the plans themselves are not contained in the Permit. As EPA has explained, when “compliance with the approved [plan] is required” by the specific terms of a permit, the content of the plan is information necessary to impose an applicable requirement and “the plan must be

³¹ *Id.* at 24.

³² *Id.*

³³ *Id.*

³⁴ *Id.* at Attachment A, PDF page 75.

included in the permit” under 40 C.F.R. § 70.6(a)(1).³⁵ In addition, to the extent the plans are required under the Indiana SIP, they are also applicable requirements that must be included in the Permit.³⁶ Accordingly, IDEM must revise the Draft Permit to include the following plans either as text in the Permit or attachments to it:

- a. **Preventive Maintenance Plan (“PMP”) in Condition B.10:** This General Condition requires implementation of the PMP, as well as preparation and maintenance of the PMP within 90 days of the later of permit issuance or initial start-up.³⁷ As the slag operations have been operating for at least 20 years, the PMP should be in place.³⁸ The Permittee is also required to have a PMP under the Indiana SIP.³⁹ In addition, the Permit states that this PMP can be used to satisfy the federal applicable requirements of 40 CFR Part 60/63 for an Operation, Maintenance, and Monitoring plan. Accordingly, the PMP required in Condition B.10 must be contained in the Permit because it is an applicable requirement, can be used to satisfy the applicable requirements of the federal rules in Parts 60 and 63, and is also necessary to determine compliance with Condition B.10(a) and (b).
- b. **Preventive Maintenance Plan in Condition D.1.5:** This Condition states that the PMP “is required for these facilities and any control devices,” i.e., the Slag Crushing, Screening, and Conveying Plant No. 1.⁴⁰ Since the PMP is an applicable requirement and is also required to determine compliance with Condition D.1.5, it must be contained in the Permit.
- c. **Preventive Maintenance Plan in Condition D.2.4:** This Condition states that the PMP “is required for these facilities and any control devices,” i.e., the Vitra Pre-Screening Plant.⁴¹ Since the PMP is an applicable requirement and is also required to determine compliance with Condition D.2.4, it must be contained in the Permit.
- d. **Preventive Maintenance Plan in Condition D.3.3:** This Condition states that the PMP “is required for this facility,” i.e., Insignificant Activities.⁴² Since the PMP is an applicable requirement and is also required to determine compliance with Condition D.3.3, it must be contained in the Permit.

³⁵ *In the Matter of WE Energies Oak Creek Power Plant, Permit No. 241007690-P-10* (June 12, 2009), https://www.epa.gov/sites/default/files/2015-08/documents/oak_creek_decision2007.pdf, at 26. See also *In the Matter of Columbia University*, Pet. NO. II-2000-08 (Dec. 16, 2002), https://www.epa.gov/sites/default/files/2015-08/documents/columbia_university_decision2000.pdf, at 27 (noting where a facility is subject to a plan, the permit must “properly incorporate that plan”).

³⁶ 40 C.F.R. §§ 70.2 (definition of applicable requirement at (1)) and 70.6(a)(1) (permits must include terms to comply with applicable requirements).

³⁷ Draft Permit at 15, Conditions B.10(a) and (b).

³⁸ TSD at 1 (noting that the current permit issued in October 2020 was the third renewal, where each permit has a 5-year term).

³⁹ 55 Fed. Reg. 18604 (May 3, 1990) (SIP approval).

⁴⁰ Draft Permit at 41.

⁴¹ *Id.* at 46.

⁴² *Id.* at 50.

- e. **Preventive Maintenance Plan in Condition D.4.3:** This Condition states that the PMP “is required for this facility,” i.e., the Slag Crushing, Screening, and Conveying Plant No. 2. Since the PMP is an applicable requirement and is also required to determine compliance with Condition D.4.3, it must be contained in the Permit.
- f. **Continuous Compliance Plan (“CCP”) in Condition C.11:** This Condition states that under SIP-approved state law, the “Permittee shall perform inspection, monitoring and record keeping in accordance with the...applicable procedures in the CCP.”⁴³ The permit also states that “failure to submit a CCP” and “maintain all information required by the CCP” is a violation of SIP-approved state law.⁴⁴ Since the CCP is an applicable requirement and is also required to determine compliance with Condition C.11, it must be contained in the Permit.
- g. **Emergency Reduction Plan (“ERP”) in Condition C.13:** This Condition requires that under SIP-approved state law, the Permittee must maintain the ERP and “shall immediately put into effect the actions stipulated in the approved ERP” upon notification by IDEM.⁴⁵ Since the ERP is an applicable requirement and is also required to determine compliance with Condition C.13, it must be contained in the Permit.

Conclusion

We urge IDEM to revise the permit as outlined in the above sections and produce a final permit consistent with Indiana regulations and the requirements of the Title V permit program.

Sincerely,



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⁴³ *Id.* at 29, Condition C.11(a); [71 Fed. Reg. 14383](#) (March 22, 2006) (SIP approval).

⁴⁴ Draft Permit at 30, Condition C.11(c); [71 Fed. Reg. 14383](#) (March 22, 2006) (SIP approval).

⁴⁵ Draft Permit at 29, Condition C.13; [37 Fed. Reg. 10842](#) (May 31, 1972) (SIP approval).

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