

Mr. Jim Ruddell
American Colloid Company
HCR 69, P.O. Box 135
Belle Fourche, SD 57717

Re: CP-123-10460
First Permit Modification to
CP-123-9190-00021

Dear Mr. Ruddell:

American Colloid Company was issued a permit on April 16, 1998 for a coal grinding and clay blending operation. A letter requesting changes to this permit was received on December 14, 1998. Pursuant to the provisions of 326 IAC 2-1 a modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the following:

1. An increase of the allowable emissions for the existing railcar unloading operation, raw material unloading operation, raw material silos, blending operation, lump breaker operation, additional storage, and loadout operation.
2. Correction of the applicability of 326 IAC 2-7. The source is now subject to 326 IAC 2-7 (Part 70 Permit Requirements) because the potential, to emit of PM10 is greater than 100 tons per year.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Nysa L. James, of my staff, at the above address; or by phone at 317-233-6875 or 1-800-451-6027 (ext 3-6875).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

NLJ

cc: File - Perry County
Perry County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Dave Holder
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Nancy Landau

Mr. Jim Ruddell
American Colloid Company
HCR 69 Box 135
Belle Fourche, South Dakota 57717

Re: A 123-10085
Amendment to CP 123-9190,
Plt ID 123-00021

Dear Mr. Ruddell:

American Colloid Company was issued a permit on April 14, 1998 for a coal grinding and clay blending operation. A letter requesting to modify the location of the exhaust points was received on August 24, 1998. The permit shall be amended as follows:

1. The general description section, located on page 1 of 8, of the construction permit shall be amended to the following (changes are bolded and crossed out for emphasis):
 - (a) Railcar Unloading, [rail car unloader, elevator, storage silo and material transfer - maximum capacity 30 TPH, controlled by baghouse (~~DC-6~~ BH13)] **and exhausts, to point designated as DC-6, inside the building,**
 - (b) Coal Silo, [storage silo - maximum capacity 10 TPH, controlled by baghouse (~~DC-6~~ BH13)] **and exhausts, to point designated as DC-6, inside the building,**
 - (c) Coal Mill, [coal mill and material transfer - maximum capacity 10 TPH, controlled by baghouse (~~DC-4~~ BH14)] **and exhausts, to point designated as DC-1, inside the building,**
 - (d) Coal Screening, [cyclone, screening and material transfer - maximum capacity 10 TPH, controlled by baghouse (~~DC-7~~ BH15)] **and exhausts, to point designated as DC-7, inside the building,**
 - (e) Raw Material Unloading, [rail car unloader, elevator and material transfer - maximum capacity 30 TPH, controlled by baghouse (~~DC-5~~ BH01)], **and exhausts to a stack designated as DC-5,**
 - (f) Raw Material Silos, [storage silos and material transfer - maximum capacity 30 TPH, controlled by bin vents (~~BV-AB, BV-CD~~ BH02, BH03 and BH04)] **and exhausts, to points designated as BV-AB and BV-AD, inside the building,**
 - (g) Blending, [blending system, elevators and material transfer - maximum capacity 25 TPH, controlled by bin vents (~~BV-1, BV-2~~ BH17 and BH18)] **and exhausts to stacks designated as BV-1 and BV-3,**
 - (h) Lump Breaker, [weigh hopper, blender, lump breaker and material transfer - maximum capacity 25 TPH, controlled by baghouses (~~DC-4~~ BH05 and BH12)] **and exhausts, to point designated as DC-4, inside the building.,**
 - (i) Additional Storage, [elevator Additional storage silo, (3 compartment tank) and material transfer - maximum capacity 25 TPH, controlled by bin vents (~~BV-3, BV-~~

- (j) **4 BH06 and BH789)] and exhausts to stacks designated as BV-3 and BV-4, Load-out, [Additional truck load-out and material transfer - maximum capacity 25 TPH, controlled by baghouse ~~DC-3~~ BH10)], and exhausts to a stack designated as DC-3,**
- (k) **Packaging, [packer silo, Additional packer and material transfer - maximum capacity 7 TPH, controlled by baghouse (~~DC-2~~ BH11)] and exhausts to a stack designated as DC-2.**

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment with the original permit.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

NLJ

cc: File - Perry County
Perry County Health Department
Southwest Regional Office
Air Compliance Section Inspector - Dave Holder
Compliance Data Section - Jerri Curless
Permit Tracking - Janet Mobley
Air Programs Section - Nancy Landau

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**American Colloid Company
Tell City Industrial Park
Troy, Indiana 47588**

is hereby authorized to construct

a coal grinding and clay blending facility, consisting of the following equipment:

- (a) Railcar Unloading, [rail car unloader, elevator, storage silo and material transfer - maximum capacity 48 TPH, controlled by baghouse (DC-6)],
- (b) Coal Silo, [storage silo - maximum capacity 10 TPH, controlled by baghouse (DC-6)],
- (c) Coal Mill, [coal mill and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-1)],
- (d) Coal Screening, [cyclone, screening and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-7)],
- (e) Raw Material Unloading, [rail car unloader, elevator and material transfer - maximum capacity 32 TPH, controlled by baghouse (DC-5)],
- (f) Raw Material Silos, [storage silos and material transfer - maximum capacity 32 TPH, controlled by binvents (BV-AB, BV-CD)],
- (g) Blending, [blending system, elevators and material transfer - maximum capacity 35 TPH, controlled by binvents (BV-1, BV-2)],
- (h) Lump Breaker, [weigh hopper, blender, lump breaker and material transfer - maximum capacity 35 TPH, controlled by baghouse (DC-4)],
- (i) Additol Storage, [elevator Additional storage silo, (3 compartment tank) and material transfer - maximum capacity 35 TPH, controlled by binvents (BV-3, BV-4)],
- (j) Loadout, [Additional truck loadout and material transfer - maximum capacity 100 TPH, controlled by baghouse DC-3], and
- (k) Packaging, [packer silo, Additional packer and material transfer - maximum capacity 7 TPH, controlled by baghouse (DC-2)].

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-123-9190-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 16, 1998
First Permit Modification: CP-123-10460-00021	Pages Affected: 1, 3, 7 and 8
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).
 - (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

6a. Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source will be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

NSPS Reporting Requirement

7. That pursuant to the New Source Performance Standards (NSPS), Part 60.250 and .670, Subparts Y and OOO, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM-OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

8. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

- 1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- 2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

- 3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
 - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

- 4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
 - (a) In the event that ownership of this coal grinding and clay blending operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

- 5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
 - (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

- 6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, (local agency if applicable) or other public official having jurisdiction.

Malfunction Condition

- 7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):
 - (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
 - (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report

Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

Fugitive Dust Emissions

9. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].\

NSPS Subpart Y (Standards of Performance for Coal Preparation Plants)

10. That this coal preparation plant shall comply with the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.250 through 60.254 (Standards of Performance for Coal Preparation Plants). This rule requires the particulate emissions from:

coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal:

gasses shall be limited to 20 percent opacity or greater.

Compliance with these opacity limits shall also satisfy the requirements of 326 IAC 5-1.

NSPS Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants)

11. That this fixed nonmetallic mineral processing plant shall comply with the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants). This rule requires the particulate emissions from:

- 1. stack emissions from DC-2, DC-3, DC-4, DC-5, BV-1, BV-2, BV-3, BV-4, BV-AB, and BV-CD shall be limited to :

1. 0.05 g/dscm; or
 2. 7% opacity,
- (b) transfer points emissions shall be limited to 10% opacity, and
- (c) fugitive emissions shall be limited to 15% opacity.

Compliance with these opacity limits shall also satisfy the requirements of 326 IAC 5-1.

NSPS Testing Requirement

12. That particulate matter (PM) and opacity tests to determine compliance with the NSPS, Subparts Y and OOO shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up pursuant to 40 CFR 60.675(c), 40 CFR 60.11 and 40 CFR 60.254. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.

- (a) A test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test.
- (b) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.
- (c) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.
- (d) Whenever the results of the test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by

OAM that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.

- (e) A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility.

13. 326 IAC 6-3 (Process Operations)

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the railcar unloading process shall not exceed 44.1 pounds per hour when operating at a process weight rate of 48 tons per hour;
- (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the coal silo, coal mill and coal screening operations shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 10 tons per hour each;
- (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the raw material unloading operation and raw material silos shall not exceed 40.5 pounds per hour each when operating at a process weight rate of 32 tons per hour each;
- (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the blending, lump breaker and additional storage operations shall not exceed 41.3 pounds per hour each when operating at a process weight rate of 35 tons per hour each;
- (e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the loadout operations shall not exceed 51.2 pounds per hour when operating at a process weight rate of 100 tons per hour; and
- (f) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the packaging operations shall not exceed 15.1 pounds per hour when operating at a process weight rate of 7 tons per hour.

- 13a. The baghouses and binvents utilized for particulate matter control shall be in operation at all times when the corresponding facilities (listed on page 1 of 8 of this construction permit) are in operation.

Baghouse Operating Condition

14. That the baghouses and binvents shall be operated at all times when the coal grinding and clay blending operation is in operation.
- (a) The Permittee shall take readings of the total static pressure drop across the baghouses and binvents, except those exhausting inside the building, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses and binvents shall be maintained within the range of 2 and 5 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
 - (b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
 - (c) The gauge employed to take the pressure drop across the baghouses and binvents or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
 - (d) An inspection shall be performed each calendar quarter of all the baghouse and binvent bags. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
 - (e) In the event that a bag's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Visible Emission Notations

15. That visible emission notations of all exhausts to the atmosphere from baghouses and binvents, except those exhausting inside the building, shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
- (a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
 - (b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
 - (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

- (d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

**CONSTRUCTION PERMIT
OFFICE OF AIR MANAGEMENT**

**American Colloid Company
Tell City Industrial Park
Troy, Indiana 47588**

is hereby authorized to construct

a coal grinding and clay blending facility, consisting of the following equipment:

- (a) Railcar Unloading, [rail car unloader, elevator, storage silo and material transfer - maximum capacity 48 TPH, controlled by baghouse (DC-6)],
- (b) Coal Silo, [storage silo - maximum capacity 10 TPH, controlled by baghouse (DC-6)],
- (c) Coal Mill, [coal mill and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-1)],
- (d) Coal Screening, [cyclone, screening and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-7)],
- (e) Raw Material Unloading, [rail car unloader, elevator and material transfer - maximum capacity 32 TPH, controlled by baghouse (DC-5)],
- (f) Raw Material Silos, [storage silos and material transfer - maximum capacity 32 TPH, controlled by binvents (BV-AB, BV-CD)],
- (g) Blending, [blending system, elevators and material transfer - maximum capacity 35 TPH, controlled by binvents (BV-1, BV-2)],
- (h) Lump Breaker, [weigh hopper, blender, lump breaker and material transfer - maximum capacity 35 TPH, controlled by baghouse (DC-4)],
- (i) Additol Storage, [elevator Additional storage silo, (3 compartment tank) and material transfer - maximum capacity 35 TPH, controlled by binvents (BV-3, BV-4)],
- (j) Loadout, [Additional truck loadout and material transfer - maximum capacity 100 TPH, controlled by baghouse DC-3], and
- (k) Packaging, [packer silo, Additional packer and material transfer - maximum capacity 7 TPH, controlled by baghouse (DC-2)].

This permit is issued to the above mentioned company (herein known as the Permittee) under the provisions of 326 IAC 2-1 and 40 CFR 52.780, with conditions listed on the attached pages.

Construction Permit No.: CP-123-9190-00021	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: April 16, 1998
First Permit Modification: CP-123-10460-00021	Pages Affected: 1, 3, 7 and 8
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

Construction Conditions

General Construction Conditions

1. That the data and information supplied with the application shall be considered part of this permit. Prior to any proposed change in construction which may affect allowable emissions, the change must be approved by the Office of Air Management (OAM).
2. That this permit to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

3. That pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.
4. That pursuant to 326 IAC 2-1-9(b)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. That notwithstanding Construction Condition No. 6, all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

6. That this document shall also become a first-time operation permit pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:
 - (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the facilities were constructed as proposed in the application. The facilities covered in the Construction Permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
 - (c) Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.
 - (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1-7.1(Fees).
 - (e) Pursuant to 326 IAC 2-1-4, the Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date established in the validation letter. The operation permit issued shall contain as a minimum the conditions in the Operation Conditions section of this permit.

6a. Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source will be required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

NSPS Reporting Requirement

7. That pursuant to the New Source Performance Standards (NSPS), Part 60.250 and .670, Subparts Y and OOO, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- (a) Commencement of construction date (no later than 30 days after such date);
- (b) Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- (c) Actual start-up date (within 15 days after such date); and
- (d) Date of performance testing (at least 30 days prior to such date), when required by a condition elsewhere in this permit.

Reports are to be sent to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, IN 46206-6015

The application and enforcement of these standards have been delegated to the IDEM-OAM. The requirements of 40 CFR Part 60 are also federally enforceable.

8. That when the facility is constructed and placed into operation the following operation conditions shall be met:

Operation Conditions

General Operation Conditions

- 1. That the data and information supplied in the application shall be considered part of this permit. Prior to any change in the operation which may result in an increase in allowable emissions exceeding those specified in 326 IAC 2-1-1 (Construction and Operating Permit Requirements), the change must be approved by the Office of Air Management (OAM).
- 2. That the permittee shall comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder.

Preventive Maintenance Plan

- 3. That pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plans), the Permittee shall prepare and maintain a preventive maintenance plan, including the following information:
 - (a) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices.
 - (b) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions.

- (c) Identification of the replacement parts which will be maintained in inventory for quick replacement.

The preventive maintenance plan shall be submitted to IDEM, OAM upon request and shall be subject to review and approval.

Transfer of Permit

- 4. That pursuant to 326 IAC 2-1-6 (Transfer of Permits):
 - (a) In the event that ownership of this coal grinding and clay blending operation is changed, the Permittee shall notify OAM, Permit Branch, within thirty (30) days of the change. Notification shall include the date or proposed date of said change.
 - (b) The written notification shall be sufficient to transfer the permit from the current owner to the new owner.
 - (c) The OAM shall reserve the right to issue a new permit.

Permit Revocation

- 5. That pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:
 - (a) Violation of any conditions of this permit.
 - (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
 - (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
 - (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
 - (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of 326 IAC 2-1 (Permit Review Rules).

Availability of Permit

- 6. That pursuant to 326 IAC 2-1-3(l), the Permittee shall maintain the applicable permit on the premises of this source and shall make this permit available for inspection by the IDEM, (local agency if applicable) or other public official having jurisdiction.

Malfunction Condition

- 7. That pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):
 - (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) or appointed representative upon request.
 - (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAM, using the Malfunction Report

Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

Annual Emission Reporting

8. That pursuant to 326 IAC 2-6 (Emission Reporting), the Permittee must annually submit an emission statement for the source. This statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31.

Fugitive Dust Emissions

9. That pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the permittee shall be in violation of 326 IAC 6-4 (Fugitive Dust Emissions) if any of the criteria specified in 326 IAC 6-4-2(1) through (4) are violated. Observations of visible emissions crossing the property line of the source at or near ground level must be made by a qualified representative of IDEM. [326 IAC 6-4-5(c)].\

NSPS Subpart Y (Standards of Performance for Coal Preparation Plants)

10. That this coal preparation plant shall comply with the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.250 through 60.254 (Standards of Performance for Coal Preparation Plants). This rule requires the particulate emissions from:

coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal:

gasses shall be limited to 20 percent opacity or greater.

Compliance with these opacity limits shall also satisfy the requirements of 326 IAC 5-1.

NSPS Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants)

11. That this fixed nonmetallic mineral processing plant shall comply with the New Source Performance Standards, 326 IAC 12 and 40 CFR 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants). This rule requires the particulate emissions from:

- 1. stack emissions from DC-2, DC-3, DC-4, DC-5, BV-1, BV-2, BV-3, BV-4, BV-AB, and BV-CD shall be limited to :

1. 0.05 g/dscm; or
 2. 7% opacity,
- (b) transfer points emissions shall be limited to 10% opacity, and
- (c) fugitive emissions shall be limited to 15% opacity.

Compliance with these opacity limits shall also satisfy the requirements of 326 IAC 5-1.

NSPS Testing Requirement

12. That particulate matter (PM) and opacity tests to determine compliance with the NSPS, Subparts Y and OOO shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up pursuant to 40 CFR 60.675(c), 40 CFR 60.11 and 40 CFR 60.254. These tests shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule or as approved by the Commissioner.
- (a) A test protocol shall be submitted to the OAM, Compliance Data Section, 35 days in advance of the test.
 - (b) The Compliance Data Section shall be notified of the actual test date at least two (2) weeks prior to the date.
 - (c) All test reports must be received by the Compliance Data Section within 45 days of completion of the testing.
 - (d) Whenever the results of the test performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented immediately unless notified by OAM that they are acceptable. The Permittee shall minimize emissions while the corrective actions are being implemented.
 - (e) A second test to demonstrate compliance shall be performed within 120 days. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility.
13. 326 IAC 6-3 (Process Operations)
- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the railcar unloading process shall not exceed 44.1 pounds per hour when operating at a process weight rate of 48 tons per hour;
 - (b) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the coal silo, coal mill and coal screening operations shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 10 tons per hour each;
 - (c) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the raw material unloading operation and raw material silos shall not exceed 40.5 pounds per hour each when operating at a process weight rate of 32 tons per hour each;
 - (d) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the blending, lump breaker and additional storage operations shall not exceed 41.3 pounds per hour each when operating at a process weight rate of 35 tons per hour each;
 - (e) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the loadout operations shall not exceed 51.2 pounds per hour when operating at a process weight rate of 100 tons per hour; and
 - (f) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the packaging operations shall not exceed 15.1 pounds per hour when operating at a process weight rate of 7 tons per hour.

- 13a. The baghouses and binvents utilized for particulate matter control shall be in operation at all times when the corresponding facilities (listed on page 1 of 8 of this construction permit) are in operation.

Baghouse Operating Condition

14. That the baghouses and binvents shall be operated at all times when the coal grinding and clay blending operation is in operation.
- (a) The Permittee shall take readings of the total static pressure drop across the baghouses and binvents, except those exhausting inside the building, at least once per week. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouses and binvents shall be maintained within the range of 2 and 5 inches of water. The Preventive Maintenance Plan for these baghouses shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of this range for any one reading.
 - (b) The instrument used for determining the pressure shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.
 - (c) The gauge employed to take the pressure drop across the baghouses and binvents or any part of the facility shall have a scale such that the expected normal reading shall be no less than 20 percent of full scale and be accurate within $\pm 2\%$ of full scale reading. The instrument shall be quality assured and maintained as specified by the vendor.
 - (d) An inspection shall be performed each calendar quarter of all the baghouse and binvent bags. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.
 - (e) In the event that a bag's failure has been observed:
 - (i) The affected compartments will be shut down immediately until the failed units have been replaced.
 - (ii) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

Visible Emission Notations

15. That visible emission notations of all exhausts to the atmosphere from baghouses and binvents, except those exhausting inside the building, shall be performed once per working shift. A trained employee will record whether emissions are normal or abnormal.
- (a) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, 80% of the time, the process is in operation, not counting start up or shut down time.
 - (b) In the case of batch or discontinuous operation, readings shall be taken during that part of the operation specified in the facility's specific condition prescribing visible emissions.
 - (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal and abnormal visible emissions for that specific process.

- (d) The Preventive Maintenance Plan for this facility shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

**Indiana Department of Environmental Management
Office of Air Management
and Southwest Regional Office**

**Technical Support Document for First Permit Modification
of the Construction Permit**

Source Background and Description

Source Name:	American Colloid Company	
Source Location:	Tell City Industrial Park, Troy, Indiana 47588	
County:	Perry	
Permit No.:	CP123-9190-00021	Issued: April 16, 1998
Revision No.	CP-123-10460	
SIC Code:	3295	
Permit Reviewer:	Nysa L. James	

History

On December 14, 1998, American Colloid Company filed an amendment requesting an increase in the process weight rates of the existing operations. The construction permit, CP-123-9190-00021, was issued on April 19, 1998. The source started operating on August 4, 1998. On November 30, 1998, the facilities listed in the above mentioned construction permit achieved maximum production rates higher than those permitted in the construction permit. The following changes were agreed to as the First Permit Modification to this construction permit.

Changes Proposed

The Office of Air Management (OAM) has reviewed a letter from American Colloid Company relating to the requested modification of their construction permit to reflect the maximum process weight rates of the existing equipment. The equipment was not previously permitted at worst case conditions. The changes are as follows (changes are bolded and stricken out for emphasis):

1. The facility descriptions, located on page 1 of 8, is amended to the following in order to reflect the increase in the process weight rates which were incorrectly listed in the construction permit application(changes are bolded and stricken out for emphasis):
 - (a) Railcar Unloading, [rail car unloader, elevator, storage silo and material transfer - maximum capacity ~~48~~ **48** TPH, controlled by baghouse (DC-6)],
 - (b) Coal Silo, [storage silo - maximum capacity 10 TPH, controlled by baghouse (DC-6)],
 - (c) Coal Mill, [coal mill and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-1)],
 - (d) Coal Screening, [cyclone, screening and material transfer - maximum capacity 10 TPH, controlled by baghouse (DC-7)],
 - (e) Raw Material Unloading, [rail car unloader, elevator and material transfer - maximum capacity ~~32~~ **32** TPH, controlled by baghouse (DC-5)],
 - (f) Raw Material Silos, [storage silos and material transfer - maximum capacity ~~32~~ **32** TPH, controlled by binvents (BV-AB, BV-CD)],

- (g) Blending, [blending system, elevators and material transfer - maximum capacity ~~25~~ **35** TPH, controlled by binvents (BV-1, BV-2)],
 - (h) Lump Breaker, [weigh hopper, blender, lump breaker and material transfer - maximum capacity ~~25~~ **35** TPH, controlled by baghouse (DC-4)],
 - (i) Additional Storage, [elevator Additional storage silo, (3 compartment tank) and material transfer - maximum capacity ~~25~~ **35** TPH, controlled by binvents (BV-3, BV-4)],
 - (j) Loadout, [Additional truck loadout and material transfer - maximum capacity ~~25~~ **100** TPH, controlled by baghouse DC-3)], and
 - (k) Packaging, [packer silo, Additional packer and material transfer - maximum capacity 7 TPH, controlled by baghouse (DC-2)].
2. Operating Condition No. 13, located on page 7 of 8, is amended to the following to reflect the increase in the process weight rates and also to indicate the PM allowable emissions for each facility (changes are bolded and stricken out for emphasis):
13. ~~That pursuant to 326 IAC 6-3 (Process Operations), the control(s) shall be in operation at all times when appropriate corresponding process is in operation, and shall not exceed the allowable particulate matter (PM) emission rate of 47.8 pounds per hour.~~
- (a) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the railcar unloading process shall not exceed 44.1 pounds per hour when operating at a process weight rate of 48 tons per hour;**
 - (b) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the coal silo, coal mill and coal screening operations shall not exceed 19.1 pounds per hour each when operating at a process weight rate of 10 tons per hour each;**
 - (c) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the raw material unloading operation and raw material silos shall not exceed 40.5 pounds per hour each when operating at a process weight rate of 32 tons per hour each;**
 - (d) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rates from the blending, lump breaker and additional storage operations shall not exceed 41.3 pounds per hour each when operating at a process weight rate of 35 tons per hour each;**
 - (e) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the loadout operations shall not exceed 51.2 pounds per hour when operating at a process weight rate of 100 tons per hour; and**
 - (f) **Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the packaging operations shall not exceed 15.1 pounds per hour when operating at a process weight rate of 7 tons per hour.**
3. Operation Condition 13a is added to page 7 of 8 and is the following (changes are bolded and stricken out for emphasis):
- 13a. The baghouses and binvents utilized for particulate matter control shall be in operation at all times when the corresponding facilities (listed on page 1 of 8 of this construction permit) are in operation.**

Enforcement Issue

None.

Recommendation

The staff recommends to the Commissioner that the modification be approved.

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

Emissions Calculations

This modification did not increase the potential emissions, therefore potential emission calculations were not performed. The process weight rates did increase from the above referenced facilities, therefore the allowable emissions shall increase. Since the allowable emissions were less than the potential emissions, the original construction permit was based on the allowable emissions. With the increase of the allowable emissions, the potential emissions are now less than the allowable emissions. The construction permit shall now be based upon the potential emissions. This increase in emissions exceeds 25 tons per year, therefore this modification shall be public noticed.

Total Potential and Allowable Emissions (entire source)

Indiana Permit Allowable Emissions Definition (after compliance with applicable rules, based on 8,760 hours of operation per year at rated capacity):

Pollutant	Allowable Emissions (tons/year)	Potential Emissions (tons/year)
Particulate Matter (PM)	1633.7	1460
Particulate Matter (PM10)	1633.7	1460
Sulfur Dioxide (SO ₂)	--	--
Volatile Organic Compounds (VOC)	--	--
Carbon Monoxide (CO)	--	--
Nitrogen Oxides (NO _x)	--	--
Single Hazardous Air Pollutant (HAP)	--	--
Combination of HAPs	--	--

- (a) (1) The railcar unloading operations shall comply with 326 IAC 6-3-2(c) using the following equation:
 $E = 55.0 * P^{0.11} - 40$; where P = process weight in tons per hour
 E = rate of emission in pounds per hour.
 $E = 55.0 * (48 \text{ tons/hr})^{0.11} - 40 = 44.1 \text{ lb/hr}$; $44.1 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 193.5 \text{ ton/yr}$.
- (2) The coal silo, coal mill and coal screening operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr).

$E = 4.10 (10 \text{ tons/hr})^{0.67} = 19.1 \text{ lbs/hr each}; 19.1 \text{ lbs/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 83.99 \text{ ton/yr each.}$

- (3) The raw material unloading operation and raw material silos shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (32 \text{ tons/hr})^{0.11} - 40 = 40.5 \text{ lb/hr each}; 40.5 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 177.5 \text{ ton/yr each.}$

- (4) The blending, lump breaker and additional storage operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (35 \text{ tons/hr})^{0.11} - 40 = 41.3 \text{ lb/hr each}; 41.3 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 180.9 \text{ ton/yr each.}$

- (5) The loadout operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (100 \text{ tons/hr})^{0.11} - 40 = 51.2 \text{ lb/hr}; 51.2 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 224.5 \text{ ton/yr.}$

- (6) The packaging operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr).

$E = 4.10 (7 \text{ tons/hr})^{0.67} = 15.1 \text{ lbs/hr}; 15.1 \text{ lbs/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 66.1 \text{ ton/yr.}$

- (b) The potential emissions before control are less than the allowable emissions, therefore, the potential emissions before control are used for the permitting determination.
- (c) Allowable emissions (as defined in the Indiana Rule) of PM and PM₁₀ are greater than 25 tons per year for this modification. Therefore, pursuant to 326 IAC 2-1, Sections 1 and 3, a construction permit is required.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) at least one of the criteria pollutant is greater than or equal to 100 tons per year,
(b) a single hazardous air pollutant (HAP) is greater than or equal to 10 tons per year, or
(c) any combination of HAPs is greater than or equal to 25 tons/year.

This new source shall apply for a Part 70 (Title V) operating permit within twelve (12) months after this source becomes subject to Title V.

The potential to emit of the source shall be based upon the emissions of DC-6, DC-1 and DC-7 before controls and the limited emissions of DC-5, BV-AB, BV-CD, BV-1, BV-2, DC-4, BV-3, BV-4, DC-3 and DC-2 (based on NSPS limitations). The total potential to emit exceeds 100 tons per year for PM₁₀, therefore is subject to 326 IAC 2-7.

This will clarify the previous evaluation made on the source that it was not subject to the Part 70 (Title V) program.

Federal Rule Applicability

There are no changes in Federal rule applicability from the original construction permit.

State Rule Applicability

326 IAC 2-2 (prevention of Significant Deterioration):

- (a) The source's potential to emit of particulate matter (PM), 15.35 tons per year, is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase the allowable emissions, potential emissions, or potential to emit, as appropriate, to the following:
 - 1.) 25 tons per year or more (326 IAC 2-1),
 - 2.) 100 tons per year or more, and greater than 10 tons per year for a single HAP or combination HAPs greater than 25 tons per year (326 IAC 2-7),
 - 3.) 250 tons per year or more (326 IAC 2-2),

from the equipment covered in this construction permit must be approved by the Office of Air Management (OAM) before such change may occur.

326 IAC 6-3 (Process Operations):

Pursuant to 326 IAC 6-3 (Process Operations), the following shall apply:

- (a) The railcar unloading operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 55.0 * P^{0.11} - 40; \quad \text{where } P = \text{process weight in tons per hour}$$

E = rate of emission in pounds per hour.

$$E = 55.0 * (48 \text{ tons/hr})^{0.11} - 40 = 44.1 \text{ lb/hr}; 44.1 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 193.5 \text{ ton/yr.}$$

- (b) The coal silo, coal mill and coal screening operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr).

$E = 4.10 (10 \text{ tons/hr})^{0.67} = 19.1 \text{ lbs/hr each}; 19.1 \text{ lbs/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb}$
 $= 83.99 \text{ ton/yr each.}$

- (c) The raw material unloading operation and raw material silos shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (32 \text{ tons/hr})^{0.11} - 40 = 40.5 \text{ lb/hr each}; 40.5 \text{ lb/hr} * 8760 \text{ hr/yr} *$
 $\text{ton}/2000 \text{ lb} = 177.5 \text{ ton/yr each.}$

- (d) The blending, lump breaker and additional storage operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (35 \text{ tons/hr})^{0.11} - 40 = 41.3 \text{ lb/hr each}; 41.3 \text{ lb/hr} * 8760 \text{ hr/yr} *$
 $\text{ton}/2000 \text{ lb} = 180.9 \text{ ton/yr each.}$

- (e) The loadout operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 55.0 * P^{0.11} - 40;$ where P = process weight in tons per hour
E = rate of emission in pounds per hour.

$E = 55.0 * (100 \text{ tons/hr})^{0.11} - 40 = 51.2 \text{ lb/hr}; 51.2 \text{ lb/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb}$
 $= 224.5 \text{ ton/yr.}$

- (f) The packaging operations shall comply with 326 IAC 6-3-2(c) using the following equation:

$E = 4.10P^{0.67}$ where: E = rate of emission in pounds per hour,
P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr).

$E = 4.10 (7 \text{ tons/hr})^{0.67} = 15.1 \text{ lbs/hr}; 15.1 \text{ lbs/hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lb} = 66.1$
 ton/yr.

There are no other changes in State rule applicability from the original construction permit.

Air Toxic Emissions

There are no changes in the air toxic emissions due to this modification.

Conclusion

The modification of this construction permit will be subject to the conditions of the attached proposed **Modification Permit No. CP-123-10460-00021.**