

Mr. James R. Carson  
Ispat Inland Inc.  
3210 Watling Street  
East Chicago, Indiana 46312

Re: Review Request, 089-12487-00316  
Available VOC Emission Reduction Credits from BP  
Amoco Oil - Whiting Refinery

Dear Mr. Carson:

Ispat Inland Inc. (Ispat) requested in a letter submitted on July 2, 2000 acknowledgment of available emission reduction credits from the December 1998 shutdown of the Lubes Unit at the BP Amoco Oil - Whiting Refinery located in Whiting, Indiana. The IDEM, OAM acknowledges the validity of the emission reduction credits (ERCs) of the Lubes Unit as presented in the following table:

Lubes Unit Equipment	Operation Permit No.	VOC ERCs* (tons/year)
No. 37 Pipe Still	45-08-93-0569	67.4
Heater to No. 37 Pipe Still	45-08-93-0563	0.94
Solvent Extraction Unit (NMP)	45-08-93-0569	59.8
Heaters to Solvent Extraction Unit	45-08-93-0564 45-08-93-0565	1.08
Methyl Ethyl Ketone (MEK) Dewaxing Unit	45-08-93-0569	394
Hydro Finishing (HiFi) Lubes Unit	45-08-93-0569	61.0
Grease Works Unit	45-08-93-0569	56.1
Heavy Oils	45-08-93-0570	0
Heaters to the Grease Works Unit	45-08-93-0564	0
Available VOC Emission Reduction Credits (tons/yr):		640

\* The VOC ERCs are based on actual emissions from the most recent representative 2-year baseline period (1997 and 1998).

Pursuant to 326 IAC 2-3-4, these VOC emission reduction credits are valid until December 2003.

According to the Emission Reduction Credit Review included in Attachment 1 of the TSD Addendum

to PSD Permit (CP-089-11194-00449) for Whiting Clean Energy, Inc. (Whiting) and documentation presented by BP Amoco, Whiting purchased 382 tons of VOC ERCs from BP Amoco. Based on the VOC emission calculations and Permit Condition D.1.6 of the Whiting permit (089-11194-00449), Whiting is required to obtain 90.4 tons of VOC ERCs. Based on this information, Whiting has a remaining 291.6 tons of VOC ERCs available for sale.

Any agreement between Whiting and Ispat shall be handled as a separate business transaction, not involving IDEM, OAM. The following table summarizes the availability of VOC emission reduction credits from BP Amoco and Whiting Clean Energy:

<b>BP Amoco</b>	<b>tons VOC</b>	<b>Whiting Clean Energy</b>	<b>tons VOC</b>
VOC ERCs from Lubes Unit Shutdown in December 1998	640	VOC ERCs purchased from BP Amoco	382
VOC ERCs Sold to Whiting Clean Energy	382	VOC ERCs Used for Cogeneration Plant	90.4
VOC ERCs Available for Sale until December 2003	258	Available VOC ERCs for Sale until December 2003	291.6

Any of the available VOC emission reduction credits transferred from either Amoco or Whiting shall be documented in the approval for the company using such emission reduction credits. Questions related to this matter should be directed to Ms. Michele M. Williams of my staff at 317-233-0863 or at 1-800-451-6027, extension 3-0863.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

MMW

cc: File - Lake County  
Air Compliance Section Inspector - Rick Massoels  
IDEM Northwest Regional Office  
Permit Tracking - Janet Mobley