

January 13, 2003

Re: RJR Drying, Inc. 089-14838-00360

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.state.in.us/idem

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**RJR Drying, Inc.
3600 Canal Street
East Chicago, IN 46312**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F089-14838-00360	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(l)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Permit Revision Requirement [326 IAC 2-8-11.1]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [113-14-2-2]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]
- C.2 Overall Source Limit [326 IAC 2-8]
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Fugitive Dust Emissions [326 IAC 6-1-11.1]
- C.8 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]
- C.9 Lake County Particulate Matter Contingency Measure [326 IAC 6-1-11.2]
- C.10 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.11 Stack Height [326 IAC 1-7]
- C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

TABLE OF CONTENTS (Continued)

Testing Requirements [326 IAC 2-8-4(3)]

C.13 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

C.14 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

C.16 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.17 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11]
[326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

C.18 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

C.19 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326
IAC 2-8-4] [326 IAC 2-8-5]

C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.21 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

C.22 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.23 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

D.1.2 FESOP Limit [326 IAC 2-8]

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

D.1.7 Parametric Monitoring

D.1.8 Baghouse Inspections

D.1.9 Broken or Failed Bag Detection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS

D.2.1 Fugitive Particulate Matter (PM)

D.2.2 Fugitive Dust Emissions [326 IAC 6-4]

D.2.3 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Compliance Determination

D.2.4 Particulate Matter (PM)

TABLE OF CONTENTS (Continued)

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

D.2.6 Reporting Requirements

Certification Form

Emergency Occurrence Form

Quarterly Deviation and Compliance Monitoring Report Form

Fugitive Dust Plan

Attachment 1

Attachment 2

Plot Plan

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a coke handling and drying source.

Authorized individual:	Vice President, RJR Drying, Inc.
Source Address:	3600 Canal Street, East Chicago, IN 46312
Mailing Address:	3600 Canal Street, East Chicago, IN 46312
General Source Phone :	(219) 398-4300
SIC Code:	3312
Source Location Status:	Lake County
County Status:	Nonattainment for PM ₁₀ , SO ₂ , ozone, and CO Attainment for NO _x
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) natural gas-fired Rotary Dryer, identified as P-1, with a capacity of 8.2 MMBtu/hr and 43,200 pounds per hour, emissions controlled by baghouse B-1, exhausting to stack S-1.
- (b) One (1) Dry Coke Storage Bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouses B-2 and B-3, exhausting to vents V-2 and V-3, respectively.
- (c) One (1) Sizing Screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by baghouse B-3, exhausting to vent V-3.
- (d) Five (5) Coke Conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by baghouses B-2, B-3, and B-4, exhausting to vents V-2 and stack S-4, respectively.
- (e) One (1) Loadout Hopper/Bucket Conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouse B-4, exhausting to stack S-4.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM₁₀: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; one (1) wet coke conveyor, identified as C-0; and one (1) wet coke storage pile; sources of fugitive emissions. [326 IAC 6-1-11.1] [326 IAC 6-4] [326 IAC 6-5]

- (b) Unpaved roads and parking lots with public access. [326 IAC 6-1-11.1] [326 IAC 6-4] [326 IAC 6-5]

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

- (c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the

shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northwest Regional Office
Telephone No.: 1-888-209-8892 or 219-881-6712
Facsimile No.: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

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

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

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

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

- (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

- a. Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- b. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Dust Emissions [326 IAC 6-1-11.1]

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

- (i) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on September 7, 2001 and revised on November 13, 2002, included as Appendix A of this permit.

C.8 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 7, 2001 and revised on November 13, 2002, included as Appendix A of this permit.

C.9 Lake County Particulate Matter Contingency Measure [326 IAC 6-1-11.2]

The Permittee shall comply with the applicable provisions of 326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures).

C.10 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.11 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.12 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.13 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be

granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.14 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

in writing, prior to the end of the initial thirty (30) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.16 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.17 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

-
- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.18 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.19 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12(Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.20 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.21 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received by April 15th in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum

requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

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

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.22 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.23 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.24 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) natural gas-fired Rotary Dryer, identified as P-1, with a capacity of 8.2 MMBtu/hr and 43,200 pounds per hour, emissions controlled by baghouse B-1, exhausting to stack S-1.
- (b) One (1) Dry Coke Storage Bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouses B-2 and B-3, exhausting to vents V-2 and V-3, respectively.
- (c) One (1) Sizing Screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by baghouse B-3, exhausting to vent V-3.
- (d) Five (5) Coke Conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by baghouses B-2, B-3, and B-4, exhausting to vents V-2 and stack S-4, respectively.
- (e) One (1) Loadout Hopper/Bucket Conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouse B-4, exhausting to stack S-4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Emission Offset [326 IAC 2-3]

The PM emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) shall not exceed the following pound per hour limits:

Facilities	Stack/Vent	PM Limit (lb/hr)
Rotary dryer (P-1)	S-1	3.09
Coke Storage Bin (P-2) and Conveyor (C-1)	V-2	1.29
Sizing Screen (P-3)	V-3	1.53
Loadout Hopper (P-4) and Conveyors (C-2 through C-5)	S-4	2.05

Compliance with these limits are equivalent to PM emissions less than 34.9 tons per year and will render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

D.1.2 FESOP Limit [326 IAC 2-8]

The PM-10 emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) shall not exceed the following pound per hour limits:

Facilities	Stack/Vent	PM-10 Limit (lb/hr)
Rotary dryer (P-1)	S-1	3.09

Facilities	Stack/Vent	PM-10 Limit (lb/hr)
Coke Storage Bin (P-2) and Conveyor (C-1)	V-2	1.29
Sizing Screen (P-3)	V-3	1.53
Loadout Hopper (P-4) and Conveyors (C-2 through C-5)	S-4	2.05

Compliance with these limits are equivalent to PM-10 emissions less than 34.9 tons per year and will render the requirements of 326 IAC 2-7 (Part 70 permit) not applicable.

D.1.3 Particulate Matter [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their baghouses.

Compliance Determination Requirements

D.1.5 Particulate Matter (PM)

In order to comply with Conditions D.1.1, D.1.2 and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) at all times these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Once per shift visible emission notations of the facilities' vents/stacks exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) 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 visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses controlling emissions from rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4), at least once per shift when the facilities are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4). All defective bags shall be replaced.

D.1.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the facilities' stacks exhaust once per shift.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain per shift records of the inlet and outlet differential static pressure during normal operation.
- (c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM10: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; one (1) wet coke conveyor, identified as C-0; and one (1) wet coke storage pile; sources of fugitive emissions. [326 IAC 6-1-11.1] [326 IAC 6-4] [326 IAC 6-5]
- (b) Unpaved roads and parking lots with public access. [326 IAC 6-1-11.1] [326 IAC 6-4] [326 IAC 6-5]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.1 Fugitive Particulate Matter (PM)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), compliance with the opacity limits specified in Condition C.6 (Fugitive Dust Emissions) shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached as Appendix A. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

D.2.2 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

D.2.3 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 7, 2001 and revised on November 13, 2002, included as Appendix A of this permit.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM)

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), opacity from the activities (as applicable) shall be determined as follows:

- (a) Paved Roads and Parking Lots
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:
 - (1) The first will be taken at the time of emission generation.
 - (2) The second will be taken five (5) seconds later.
 - (3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.

- (b) **Unpaved Roads and Parking Lots**
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.
- (c) **Batch Transfer**
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.
- (d) **Continuous Transfer**
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.
- (e) **Wind Erosion from Storage Piles**
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.
- (f) **Wind Erosion from Exposed Areas**
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.
- (g) **Material Transported by Truck or Rail**
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the inplant transportation requirement.
- (h) **Material Transported by Front End Loader or Skip Hoist**
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:
 - (1) The first will be taken at the time of emission generation.
 - (2) The second will be taken five (5) seconds later.
 - (3) The third will be taken five (5) seconds later or ten (10) seconds after the first.The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand at least fifteen (15) feet from the plume approximately and at right angles to the plume. Each reading shall be taken approximately four (4) feet above the surface of the roadway or parking area.
- (i) **Material Processing Limitations**
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible emissions limitations from material processing equipment shall be determined using 40

CFR 60, Appendix A, Method 22. Compliance with all particulate matter limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 5 or 17.

- (j) Dust Handling Equipment
Compliance with this standard shall be determined by 40 CFR 60, Appendix A, Method 9.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.5 Record Keeping Requirements

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements):

- (a) The source shall keep the following documentation to show compliance with each of its control measures and control practices:
 - (1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.
 - (2) For each application of water or chemical solution to roadways, the following shall be recorded:
 - (A) The name and location of the roadway controlled
 - (B) Application rate
 - (C) Time of each application
 - (D) Width of each application
 - (E) Identification of each method of application
 - (F) Total quantity of water or chemical used for each application
 - (G) For each application of chemical solution, the concentration and identity of the chemical
 - (H) The material data safety sheets for each chemical
 - (3) For application of physical or chemical control agents not covered by 326 IAC 6-1-11.1(B), the following:
 - (A) The name of the agent
 - (B) Location of application
 - (C) Application rate
 - (D) Total quantity of agent used
 - (E) If diluted, percent of concentration
 - (F) The material data safety sheets for each chemical
 - (4) A log recording incidents when control measures were not used and a statement of explanation.

- (5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

- (a) Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), a quarterly report shall be submitted, stating the following:
 - (1) The dates any required control measures were not implemented
 - (2) A listing of those control measures
 - (3) The reasons that the control measures were not implemented
 - (4) Any corrective action taken
- (b) These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, IN 46312
Mailing Address: 3600 Canal Street, East Chicago, IN 46312
FESOP No.: F089-14838-00360

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, IN 46312
Mailing Address: 3600 Canal Street, East Chicago, IN 46312
FESOP No.: F089-14838-00360

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, IN 46312
Mailing Address: 3600 Canal Street, East Chicago, IN 46312
FESOP No.: F089-14838-00360

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Appendix A

FUGITIVE PARTICULATE MATTER EMISSION DUST CONTROL PLAN

Source Name: RJR Drying, Inc.

Source Address: 3600 Canal Street, East Chicago, Indiana 46312

Owner/Operator/Facility Contact: John Sabol, Vice President
Ron Sabol, President

Fugitive Particulate Matter Sources:

- 1) (P-5) Vehicle Traffic (unpaved dirt/gravel roads within facility)
- 2) (P-0) Wet Coke Receiving Hopper
- 3) (C-0) Wet Coke Conveyor
- 4) Wet Coke Storage Pile
- 5) Dry Coke Storage Tank Entry

Annotated Map: See Attached

Vehicular Activity:

- 1) 18-Wheel Semi Dump Trucks @ 3 Round Trips/Day
- 2) Payloaders Conveying Wet Coke Material

Material/Quantity Handled: Wet Coke Material (18% Moisture Content),
~ 43,000 lbs/hr

Aggregate Piles: Wet Coke Storage Pile (18% Moisture Content),
Maintained by Payloaders to Conveyors

To ensure proper maintenance of unpaved roads, dust handling during vehicle transfer, and control of any fugitive emissions from coke storage tank loadout entry and aggregate piles, and ultimately in order to prohibit any violation of limitation emissions or potential to emit, the Fugitive Particulate Matter Emission Dust Control Plan shall be implemented for RJR Drying, Inc.

A) Responsibilities:

- 1) The Plant Manager will oversee the responsibility for inspecting roads, vehicles, coke storage tank entry and piles, maintaining their proper conditions, and implementing the Fugitive Dust Control Plan as needed and/or required.
- 2) Monitoring for visible emissions will be performed by employees who have worked at the facility for at least one (1) month and have been trained in the appearance/characteristics of normal visible emissions for a particular process.

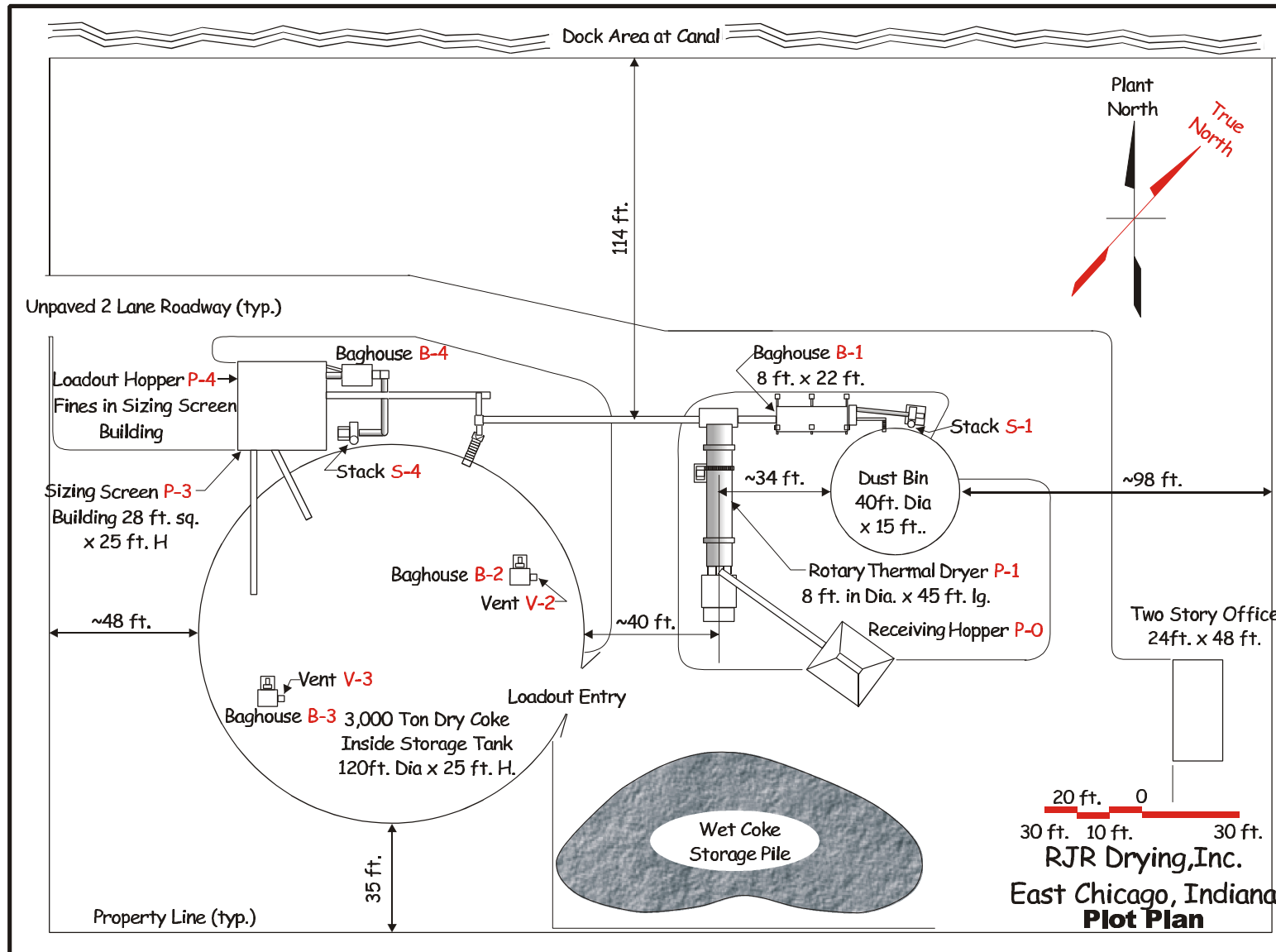
B) Description of Control Measures:

- 1) Unpaved Roads - A 2,500 gallon tanker truck with a spray manifold applying a mixture of water and Nalco dust suppressant* will be applied to the roadway surfaces four (4) times per day. Dust suppression will be maintained on a regular basis except upon the event of precipitation. See Attachment 1. Visible emissions will be noted once per shift or upon use by traffic, and limitations will be maintained at <10% at all times. See Attachment 2.
- 2) Vehicle Transfer -
 - a) Semi-trucks conveying/transferring dry coke will be monitored once per shift or upon conveyance for visible emissions during handling and transfer at all times. Visible emission limitations will be maintained at 0%. See Attachment 2.
 - b) Payloaders transfer wet coke to the Receiving Hopper (P-0) which travels to the Wet Coke Conveyor (C-0). The wet coke has a natural suppressant of 18% moisture content. Visible emissions will be noted once per shift or upon conveyance and limitations will be maintained at <10% at all times. See Attachment 2.
- 3) Dry Coke Storage Tank - The dry coke storage tank is equipped with two (2) baghouses and two (2) vents. The baghouses will be maintained in order to control related emissions to the vents; the loadout entry will be monitored once per shift for emissions. Visible emission limitations from loadout entry will be maintained at 0%. See Attachment 2.
- 4) Aggregate Piles - The wet coke storage pile has a natural suppressant in that it maintains at least an 18% moisture content. Visible emissions will be noted once per shift and limitations will be maintained at <10% at all times. See Attachment 2.

C) Alternative Control Practices:

- 1) Certain conditions preventing control measures, such as a precipitation event and immediately following, would negate the use of chemical dust suppressant for roadways. Upon change in the weather, the dust suppression program would resume.
- 2) Aside from facility shut-down, process-related shut-downs, lack of vehicle traffic, or inclement weather, monitoring for visible emissions will be performed on a regular basis.
- 3) At any time that an abnormal emission-related incident occurs, the Agency will be notified within the required timely period.

- D) **Schedule for Achievable Compliance:**
Many aspects of the Fugitive Dust Control Plan, such as roadway dust suppression, are already in place. Monitoring in specific areas will be initiated in the immediate future, upon issuance of the pending FESOP permit; no schedule of compliance will be needed in order to implement this plan.
- E) **Recordkeeping:**
Records which document all control measures and activities to be implemented in accordance with the approved control plan shall be maintained at the facility.



Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name: RJR Drying, Inc.
Source Location: 3600 Canal Street, East Chicago, IN 46312
County: Lake
SIC Code: 3312
Operation Permit No.: F089-14838-00360
Permit Reviewer: ERG/BS

The Office of Air Quality (OAQ) has reviewed a FESOP application from RJR Drying, Inc. relating to the operation of coke handling and drying facility.

Source Definition

RJR Drying, Inc. (089-00360) owns and operates a stationary coke handling and drying source located at 3600 Canal Street, East Chicago, IN 46312. Mid Continent Coal and Coke Co. (089-05057) owns and operates a portable coke screening, sizing, and handling source currently located at 3600 Canal Street, East Chicago, IN 46312. On September 9, 2002, representatives from RJR Drying (RJR), Mid Continent Coal and Coke (MCCC), and IDEM, OAQ met to evaluate and complete a co-location determination for the 3600 Canal Street sources. Even though these sources are owned by separate companies with separate shareholders, IDEM determined that RJR and MCCC are co-located sources because they have a support relationship and are located on contiguous properties. Approximately 80% of the coke dried at RJR is provided by the MCCC source on Canal Street and 100% of the coke dried at RJR is sent to the MCCC source on Canal Street. IDEM concluded that the portable MCCC source will receive a Minor Source Modification such that when it is co-located with RJR (a FESOP source), the combined total source PTE will remain less than Title V, PSD major, and Emission Offset major thresholds.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) natural gas-fired Rotary Dryer, identified as P-1, with a heat input capacity of 8.2 MMBtu/hr and 43,200 pounds per hour, emissions controlled by baghouse B-1, exhausting to stack S-1.
- (b) One (1) Dry Coke Storage Bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouses B-2 and B-3, exhausting to vents V-2 and V-3, respectively.
- (c) One (1) Sizing Screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by baghouse B-3, exhausting to vent V-3.

- (d) Five (5) Coke Conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by baghouses B-2, B-3, and B-4, exhausting to vents V-2 and stack S-4, respectively.
- (e) One (1) Loadout Hopper/Bucket Conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by baghouse B-4, exhausting to stack S-4.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM10: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; one (1) wet coke conveyor, identified as C-0; and one (1) wet coke storage pile; sources of fugitive emissions. [326 IAC 6-1-11.1][326 IAC 6-4][326 IAC 6-5]
- (b) Unpaved roads and parking lots with public access. [326 IAC 6-1-11.1][326 IAC 6-4][326 IAC 6-5]

Existing Approvals

The source has constructed and has been operating under the following previous approvals:

- (1) CP 089-3708-00360, issued January 23, 1996; and
- (2) E 089-10490-00360, issued May 14, 1999.

All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous registrations and permits are superseded by this permit.

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this FESOP permit:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: All facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete FESOP application for the purposes of this review was received on September 7, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document; see Appendix A, pages 1 through 3.

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	0.02
VOC	0.20
CO	3.13
NO _x	3.72

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM-10 is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Rotary Dryer (stack S-1)	13.51(a)	13.51(a)	0.02	0.2	3.13	3.72	Neg.

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Coke Storage Bin (P-2) and Conveyor (C-1) (vent V-2)	5.63(a)	5.63(a)	0	0	0	0	0
Sizing Screen (P-3) (vent V-3)	6.76(a)	6.76(a)	0	0	0	0	0
Loadout Hopper (P-4) and Conveyors (C-2 through C-5) (stack S-4)	9.01 ^(a)	9.01 ^(a)	0	0	0	0	0
Total Emissions	34.91	34.91	0.02	0.2	3.13	3.72	Neg.

Neg. - Negligible

(a) Pursuant to 326 IAC 6-1-2, particulate matter emissions from these facilities is limited to 0.03 gr/dscf. The limited potential to emit from these facilities is based on the 0.03 gr/dscf emission limit and respective exhaust flow rates.

Note that the following insignificant activities are located at the source: 1) a wet coke hopper and conveyor, 2) a wet coke storage pile, and 3) unpaved roads. All activities are sources fugitive emissions. Since the source is not '1 of the 28' and there are no applicable NSPS that were in effect as of 8/7/80, fugitive emissions are not counted towards PSD or Part 70 applicability. As a result, fugitive emissions are not included in the table above. Also note that the fugitive emissions from the wet coke hopper, conveyor, and storage pile are negligible due to the moisture content of the coke. See Appendix A of this document for more information regarding the fugitive emissions from the unpaved roads.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	moderate nonattainment
SO ₂	primary nonattainment
NO ₂	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.
- (b) Lake County has been classified as attainment or unclassifiable for NO₂, lead and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Lake County has been classified as nonattainment for PM10, SO₂, and ozone. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source. 40 CFR Part 60 Subpart OOO (New Source Performance Standards for Nonmetallic Mineral Processing Plants) does not apply to this source because coke is not a nonmetallic mineral as defined in 40 CFR 60.671.

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-3 (Emission Offset)

Compliance with 326 IAC 6-1-2 and 326 IAC 2-8 will limit the source's potential to emit PM-10 to less than 100 tons per year and therefore render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

326 IAC 2-8 (FESOP)

The PM-10 emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf). The equivalent pounds per hour limits for these facilities are listed below:

Facilities	Stack/Vent	Exhaust flow rate (acfm)	PM-10 Limit (lb/hr)
Rotary dryer (P-1)	S-1	12,000	3.09
Coke Storage Bin (P-2) and Conveyor (C-1)	V-2	5,000	1.29
Sizing Screen (P-3)	V-3	6,000	1.53
Loadout Hopper (P-4) and Conveyors (C-2 through C-5)	S-4	8,000	2.05

The PM-10 emissions from the entire source are equivalent to 34.9 tons per year (not including fugitive emissions). Compliance with these limits will ensure that 326 IAC 2-7 does not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not a source of Hazardous Air Pollutants; therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of particulate matter and is located in Lake County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15th of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-2 (Particulate Matter for Non-attainment areas)

Pursuant to 326 IAC 6-1-2, the particulate matter (PM) emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6-1-10.1 (Lake County PM-10 emission requirements)

Pursuant to 326 IAC 6-1-10.1(d), this source is not subject to 326 IAC 6-1-10.1 because it does not operate any of the specifically listed facilities regulated by this rule.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

The source is subject to the requirements of 326 IAC 6-1-11.1 because the source is located in Lake County and it has the potential to emit fugitive particulate matter emissions greater than five (5) tons per year.

Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP), submitted on September 7, 2001 and revised on November 13, 2002, included as Appendix A of the permit.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

This source is subject to the requirements of 326 IAC 6-1.11-2 because the source has a potential to emit PM10 greater than ten (10) tons per year.

326 IAC 6-5 (Fugitive Particulate Matter Limitations)

Pursuant to 326 IAC 6-5-1(b), this source is subject to 326 IAC 6-5 because it has the potential to emit fugitive particulate matter and was constructed after December 13, 1985. Pursuant to this rule, the source shall control fugitive emissions according to the Fugitive Dust Control Plan (FDCP) submitted on September 7, 2001 and revised on November 13, 2002, included as Appendix A of the permit.

326 IAC 8 (Volatile Organic Compounds)

This source emits insignificant quantities of VOC and does not conduct any of the operations specifically listed in 326 IAC 8. Therefore, no 326 IAC 8 rules apply to this source.

Testing Requirements

No single facility or stack contributes greater than 40% to the source's uncontrolled potential to emit PM/PM10. Compliance with the monitoring requirements stated in the attached permit will ensure compliance with the respective limitations and standards. Therefore, no testing is required.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and coke hopper (P-4) have applicable compliance monitoring conditions as specified below:
 - (a) Once per shift visible emissions notations of the facilities' stack/vent exhausts shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. 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 visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) The Permittee shall record the total static pressure drop across the baghouses controlling emissions from the facilities, at least once per shift when the facilities are in operation. When for any one reading, the pressure drop across the baghouses are outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the baghouses must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Matter) and 326 IAC 2-8 (FESOP), and render the requirements of 326 IAC 2-3 (Emission Offset) not applicable.

Conclusion

The operation of this coke drying facility shall be subject to the conditions of the attached proposed FESOP No.: F089-14838-00360.

**Appendix A: Emission Calculations
PM/PM10 Emissions from
Coke Conveying and Handling**

**Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-14383-00360
Reviewer: ERG/BS
Date: April 1, 2002**

Baghouse B-1; controlling emissions from Rotary Dryer (P-1)

Baghouse outlet grain loading: 0.007 gr/dscf
Baghouse exhaust flow rate: 12000 acfm

Controlled Potential Emissions = Grain Loading (gr/dscf) x Exhaust Flow Rate (acfm) x 0.03754 (ton-min/gr-yr)
Controlled Potential Emissions = 3.15336 PM/PM10 tpy

Allowable grain loading: 0.03 gr/dscf (326 IAC 6-1-2)
Allowable Emissions = 13.51 PM/PM10 tpy

Baghouse B-2; controlling emissions from Coke Storage Bin (P-2) and Coke Coveyor (C-1)

Baghouse outlet grain loading: 0.007 gr/dscf
Baghouse exhaust flow rate: 5000 acfm

Controlled Potential Emissions = Grain Loading (gr/dscf) x Exhaust Flow Rate (acfm) x 0.03754 (ton-min/gr-yr)
Controlled Potential Emissions = 1.3139 PM/PM10 tpy

Allowable grain loading: 0.03 gr/dscf (326 IAC 6-1-2)
Allowable Emissions = 5.63 PM/PM10 tpy

Baghouse B-3; controlling emissions from Coke Sizing Screen (P-3)

Baghouse outlet grain loading: 0.007 gr/dscf
Baghouse exhaust flow rate: 6000 acfm

Controlled Potential Emissions = Grain Loading (gr/dscf) x Exhaust Flow Rate (acfm) x 0.03754 (ton-min/gr-yr)
Controlled Potential Emissions = 1.57668 PM/PM10 tpy

Allowable grain loading: 0.03 gr/dscf (326 IAC 6-1-2)
Allowable Emissions = 6.76 PM/PM10 tpy

Baghouse B-4; controlling emissions from Coke Coveyors (C-2, C-3, C-4, and C-5) and Loadout Hopper (P-4)

Baghouse outlet grain loading: 0.007 gr/dscf
Baghouse exhaust flow rate: 8000 acfm

Controlled Potential Emissions = Grain Loading (gr/dscf) x Exhaust Flow Rate (acfm) x 0.03754 (ton-min/gr-yr)
Controlled Potential Emissions = 2.10224 PM/PM10 tpy

Allowable grain loading: 0.03 gr/dscf (326 IAC 6-1-2)
Allowable Emissions = 9.01 PM/PM10 tpy

TOTAL CONTROLLED PM/PM10 EMISSIONS: 6.83 tpy

TOTAL ALLOWABLE PM/PM10 EMISSIONS: 34.91 tpy

**Appendix A: Emission Calculations
Natural Gas Combustion
Rotary Thermal Dryer (MMBTU/HR<10)**

**Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-14383-00360
Reviewer: ERG/BS
Date: April 1, 2002**

Heat Input Capacity
MMBtu/hr

8.5

Potential Throughput
MMCF/yr

74.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NO _x	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.07	0.28	0.02	3.72	0.20	3.13

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors from AP-42, Chapter 1.4
(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

HAP emissions from this facility are negligible.

Appendix A: Emission Calculations
Fugitive PM/PM10
Unpaved Roads

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-14383-00360
Reviewer: ERG/BS
Date: April 1, 2002

Unpaved Roads

The following calculations determine the amount of emissions created by unpaved roads, based on 8760 hours of use and AP-42, Ch. 13.2.2 (Supplement E, 9/98)

$$\begin{aligned}
 &2 \text{ trip/hr} \times \\
 &0.057 \text{ mile/trip} \times \\
 &3 \text{ (round trip)} \times \\
 &8760 \text{ hr/yr} = \qquad \qquad \qquad 2995.92 \text{ miles per year}
 \end{aligned}$$

PM

Method: $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$
 $= 11.40$

where: $k = 10$ (particulate size multiplier for PM-10) ($k = 10$ for PM-30 or TSP)
 $s = 6$ mean % silt content of unpaved roads
 $b = 0.5$ Constant for PM-10 ($b = 0.5$ for PM-30 or TSP)
 $c = 0.4$ Constant for PM-10 ($c = 0.4$ for PM-30 or TSP)
 $W = 26.25$ tons average vehicle weight
 $Mdry = 0.2$ surface material moisture content, %
 $p = 120$ no. of days with at least 0.254 mm of precipitation (see Fig/ 13.2.2-1)

$$11.40 \text{ lb/mi} * 2995.92 \text{ mi/yr} = \quad \quad \quad \mathbf{17.08 \text{ ton/yr}}$$

PM10

Method: $E_f = \{k * [(s/12)^{0.8}] * [(W/3)^b] / [(Mdry/0.2)^c] * [(365-p) / 365]$
 $= 2.39$

where: $k = 2.6$ (particulate size multiplier for PM-10) ($k = 10$ for PM-30 or TSP)
 $s = 6$ mean % silt content of unpaved roads
 $b = 0.4$ Constant for PM-10 ($b = 0.5$ for PM-30 or TSP)
 $c = 0.3$ Constant for PM-10 ($c = 0.4$ for PM-30 or TSP)
 $W = 26.25$ tons average vehicle weight
 $Mdry = 0.2$ surface material moisture content, %
 $p = 120$ no. of days with at least 0.254mm of precipitation (see Fig/ 13.2.2-1)

$$2.39 \text{ lb/mi} * 2995.92 \text{ mi/yr} = \quad \quad \quad \mathbf{3.58 \text{ ton/yr}}$$