



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: May 8, 2008

RE: Essroc Cement Corporation / 019-21450-00008

FROM: Matthew Stuckey, Branch 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 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, 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 4-21.5-3-7 and IC 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) 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 considerations 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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

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.



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May 8, 2008

Paul Stewart  
Plant Manager  
ESSROC Cement Corporation  
301 Highway 31  
Speed, IN 47172-1305

Re: 019-21450-00008  
Plantwide Applicability Limitation (PAL) Permit  
and First Significant Permit Modification to  
Part 70 Permit No.: T019-6016-00008

Dear Mr. Stewart:

ESSROC Cement Corporation was issued a Part 70 operation permit on June 15, 2004 for a stationary portland cement plant located at 301 Highway 31, Speed IN 47172-1305. A letter requesting changes to this permit to include provisions for a Plantwide Applicability Limitation (PAL) for NO<sub>x</sub> was received by the Office of Air Quality (OAQ) on July 13, 2005. Pursuant to 326 IAC 2-7-12(d)(1)(A), the permit is being revised through a significant permit modification, since the PAL is added to the permit.

Pursuant to the provisions of 326 IAC 2-7-12(d)(1)(A) and IC 13-15-7-1, a significant permit modification is hereby approved as described in the attached Technical Support Document (TSD).

Other than the changes detailed in the TSD for this approval, all other conditions of the permit shall remain unchanged and in effect. Please find enclosed the entire modified permit document for final issuance.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Bob Sidner, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (703) 633-1701 to speak directly to Mr. Sidner. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by

Donald F. Robin, P.E., Section Chief  
Permits Branch  
Office of Air Quality

Attachments: Technical Support Document, Appendix A (Baseline Actual Emissions and Proposed PAL Limits for NO<sub>x</sub>), updated Part 70 permit

cc: File - Clark County  
U.S. EPA, Region V  
Clark County Health Department  
Air Compliance Section Inspector  
Compliance Data Section  
Administrative and Development



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

### ESSROC Cement Corporation 301 Highway 31 Speed, Indiana 47172

(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.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. 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. 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.**

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 2-7 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.: T019-6016-00008	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 15, 2004  Expiration Date: June 15, 2009
First Administrative Amendment No. 019-25019-00008, issued September 7, 2007 Second Administrative Amendment No. 019-26369-00008, issued April 15, 2008	
First Significant Permit Modification No.: 019-21450-00008	
Issued by: Original signed by Donald F. Robin, P.E., Section Chief Permits Branch Office of Air Quality	Issuance Date: May 8, 2008  Expiration Date: June 15, 2009

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## 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.4 and the description boxes in Sections D 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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a portland cement manufacturing plant.

Source Address:	Highway 31, Speed, Indiana 47172
Mailing Address:	Highway 31, Speed, Indiana 47172-1305
General Source Phone Number:	812 246-5472
SIC Code:	3241
County Location:	Clark
Source Location Status:	Nonattainment for PM <sub>2.5</sub> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 listed source categories

### A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

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This Portland cement manufacturing company consists of two (2) plants:

- (a) ESSROC Cement Corporation, #00008 is located at Highway 31, Speed, IN 47172; and
- (b) Hanson Aggregates Midwest Inc. - Aggrock Quarries, #05017 is located at 5501 Highway 403, Sellersburg, IN 47172.

IDEM has determined that ESSROC Cement Corporation and Hanson Aggregates are not under the common control of ESSROC Cement Corporation; therefore they are considered separate sources for the purposes of Part 70 applicability.

### A.3 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

#### Quarry activities

- (1) Quarry drilling, identified as EU01, constructed in 1982, with particulate matter (PM) emissions controlled by one (1) baghouse, identified as the drilling rig baghouse 01 and exhausting to stack EP01. Note: the baghouse controlling the quarry drilling has no exhaust to the atmosphere. Dust is collected and then re-deposited into the ground.
- (2) Quarry blasting, identified as EU75, constructed prior to 1945, with associated fugitive particulate matter (PM) emissions.
- (3) Raw material (limestone) loading to trucks, identified as EU76, constructed in 1948, with particulate matter emissions uncontrolled.

#### Raw material stockpile operations

- (4) Raw material (clay overburden) unloading to strippings stockpile, identified as EU78, constructed in 1948, with emissions uncontrolled.

- (5) Strippings stockpile, identified as EU145, created before 1945.
- (6) Truck unloading to additive hopper or additive storage pile (sand, iron, or Missouri clay), identified as EU99, constructed in 1948, with emissions uncontrolled.
- (7) Silica/Alumina/Iron additive storage pile, identified as EU100, created before 1945.
- (8) Additive clay blend pile, identified as EU101, created before 1945.
- (9) Truck unloading to clay storage piles, identified as EU102, constructed in 1948, with emissions uncontrolled.
- (10) Uncovered clay storage pile, identified as EU103, created before 1945.
- (11) Covered clay storage pile, identified as EU104, created before 1945.

### **Raw Material Sizing Operations**

- (12) Raw material unloading to stone surge pile or primary crusher, identified as EU80, with emissions uncontrolled, commenced before 1956.
- (13) Stone surge pile, identified as EU81, created before 1956.
- (14) One (1) primary crusher, identified as EU82, constructed in 1956, with a nominal throughput of 700 tons per hour, with PM emissions uncontrolled.
- (15) One (1) covered conveyor belt for transferring stone from primary crusher to screens, identified as EU83, constructed in 1956, with a nominal throughput of 700 tons per hour, with emissions uncontrolled.
- (16) Screens, identified as EU84, with a nominal throughput of 700 tons per hour, constructed in 1956, with emissions uncontrolled.
- (17) One (1) secondary crusher, identified as EU02, constructed in 1956, with a nominal throughput of 1050 tons per hour, with PM emissions controlled by one (1) baghouse, identified as baghouse 200, and exhausting to one (1) stack, identified as EP02.
- (18) Covered conveyor for transferring stone from screens and secondary crusher to tertiary crusher or stone ladder bypass, identified as EU03, constructed in 1956, with a nominal throughput of 1050 tons per hour, with PM emissions controlled by one (1) baghouse, identified as baghouse 201, and exhausting to one (1) stack, identified as EP03.
- (19) Two (2) tertiary crushers, identified as EU04 and EU04a, both constructed in 1956, each with a nominal throughput of 350 tons per hour, with PM emissions from both crushers controlled by one (1) baghouse, identified as baghouse 201, and exhausting to one (1) stack, identified as EP03.
- (20) One (1) conveyor used to bypass tertiary crusher, referred to as the stone ladder bypass, identified as EU05, constructed in 1956, with emissions controlled by a baghouse, identified as baghouse 201, and exhausting to one (1) stack, identified as EP03.
- (21) One (1) covered conveyor for transferring material from stone ladder and tertiary crusher to traveling belt, identified as EU85, constructed in 1956, with a nominal throughput of 700 tons per hour, with emissions uncontrolled, with emissions uncontrolled.
- (22) One (1) traveling belt for transferring material from covered conveyor to North and South stone bins, identified as EU86, constructed in 1956, with a nominal throughput of 700 tons per hour, with emissions uncontrolled.

- (23) North stone bin, identified as EU06, constructed in 1956, with emissions controlled by a baghouse, identified as baghouse 101, and exhausting to one (1) stack, identified as EP04.
- (24) South stone bin, identified as EU07, constructed in 1956, with emissions controlled by one (1) baghouse, identified as baghouse 102, and exhausting to one (1) stack, identified as EP05.
- (25) Stone conveyor transfer to truck, identified as EU87, constructed in 1956, with a nominal throughput of 700 tons per hour, with emissions uncontrolled.
- (26) One (1) truck unloading station to crushed limestone storage pile, identified as EU89, constructed in 1956, with emissions uncontrolled.
- (27) One (1) truck loading station from crushed limestone storage pile, identified as EU91, constructed in 1956, with emissions uncontrolled.
- (28) One (1) truck unloading station to truck dump hopper, identified as EU93, constructed in 1956, with emissions uncontrolled.
- (29) One (1) truck unloading station to emergency limestone storage pile or truck dump hopper, identified as EU94, constructed in 1956, with emissions uncontrolled.
- (30) Crushed limestone storage piles, identified as EU90, created before 1957.
- (31) Emergency limestone storage pile, identified as EU95, created during 1957.
- (32) One (1) truck dump hopper, identified as EU96, constructed in 1977, with emission uncontrolled.
- (33) One (1) limestone conveyor for transferring limestone from the truck dump hopper to the main limestone storage pile, identified as EU97, constructed in 1977, with a nominal throughput of 700 tons per hour, with emissions uncontrolled.
- (34) Main limestone storage pile, identified as EU98, created during 1957.

#### **Kiln #1 Cement Kiln Dust (CKD) Operations**

- (35) One (1) dust tank system, identified as EU21, constructed in 1971 with a nominal throughput of 100 tons per hour, with emissions controlled by a baghouse, identified as baghouse 210, and exhausting to stack EP17.
- (36) Truck loading from the dust tank system, identified as EU113, with emissions uncontrolled, commenced during July 1971.
- (37) CKD storage pile, identified as EU118, created before 1945.
- (38) CKD sales loadout spout (kiln #1 dust tank), identified as EU155, constructed in 1996, with emissions controlled by a baghouse, with a nominal air flow rate of 2400 actual cubic feet per minute, identified as baghouse 266 (CE98) and exhausting to stack EP98.

#### **Kiln #2 Cement Kiln Dust (CKD) Operations**

- (39) Truck loading from the elevator dust tank, identified as EU115, with emissions uncontrolled, commenced during 1977.
- (40) Truck unloading to CKD storage pile, identified as EU117, with emissions uncontrolled, commenced during 1977.

### **Miscellaneous Facilities**

- (41) Plant Roads, identified as EU152.
- (42) Vacuum system, identified as EU73, constructed in 1985, with emissions controlled by a baghouse with a nominal air flow rate of 400 actual cubic feet per minute, identified as baghouse 250, and exhausting to stack EP75.
- (43) One (1) warehouse conveyor system for conveying bagged cement, identified as EU74, constructed in 1985, with emissions controlled by a baghouse with a nominal air flow rate of 1650 actual cubic feet per minute, identified as baghouse 249, and exhausting to stack EP76.

### **Clay Processing Operations**

- (44) Clay hopper, identified as EU105, constructed prior to 1945.
- (45) One (1) covered conveyor system for transferring material from storage piles and clay hopper to the clay crusher, identified as EU106, constructed before 1954, with a nominal throughput of 300 tons per hour, with emissions uncontrolled.
- (46) One (1) clay crusher, identified as EU08, constructed in 1977, with a nominal throughput of 40 tons per hour, with emissions controlled by a baghouse, identified as baghouse 227, and exhausting to stack EP07.

### **Finish Operations Crane Storage Facilities**

- (47) Emergency BP stone storage pile, identified as EU128, created before 1945.
- (48) One (1) truck unloading station to Emergency BP stone storage pile or Crane storage pile, identified as EU127, with emissions uncontrolled, commenced before 1945.
- (49) One (1) truck unloading station to gypsum storage piles, identified as EU129, with emissions uncontrolled, commenced before 1945.
- (50) Crane storage building, including gypsum storage bin, stone storage bin, two (2) clinker storage bins, and stone, clinker, and gypsum storage piles, identified as EU131, constructed in 1935.
- (51) Gypsum storage piles, identified as EU130 and EU134, created before 1945.

### **Fossil Fuel Storage and Handling Facilities**

- (52) One (1) truck unloading station to the reserve coal storage pile, identified as EU136, constructed in June 1971, with emissions uncontrolled.
- (53) One (1) reserve coal storage pile, identified as EU137, created in May 1971.
- (54) One (1) coal storage pile, identified as EU142, constructed prior to 1945.
- (55) One (1) coal draw-up covered conveying system for transferring material from the coal/alternate energy storage pile to the coal transfer tower, identified as EU63, constructed in June 1972, with a nominal throughput of 200 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 206, and exhausting to stack EP77.
- (56) Coal transfer tower, identified as EU64, constructed in June 1972, with a nominal throughput of 200 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 207, and exhausting to stack EP78.

- (57) One (1) coal bin, identified as EU65, constructed in June 1972, with emissions controlled by one (1) baghouse, identified as baghouse 208, and exhausting to stack EP79.

#### **Kiln #1 Clinker Handling Facilities**

- (58) One (1) #1 clinker drag conveyor for transferring clinker from clinker cooler #1 to the apron conveyor, identified as EU23, constructed in May 1971, with a nominal throughput of 100 tons per hour, with emissions controlled by a baghouse, identified as baghouse 217, and exhausting to one (1) stack identified as EP19.
- (59) Apron conveyor for transferring clinker from the #1 clinker drag conveyor to either the clinker can #1 or the long belt, identified as EU24, constructed in May 1971, with a nominal throughput of 100 tons per hour, with emissions controlled by two baghouses, identified as baghouse 218, exhausting to one (1) stack identified as EP20 and baghouse 31382, exhausting to one (1) stack identified as EPN1.
- (60) Clinker can #1, which is a vertical bin with a lid used for storing off-spec clinker, identified as EU114, constructed in May 1971, with emissions controlled by two baghouses, identified as baghouse 218, exhausting to one (1) stack identified as EP20 and baghouse 31382, exhausting to one (1) stack identified as EPN1.

#### **Kiln #2 Clinker Handling Facilities**

- (61) One (1) #2 clinker drag conveyor for transferring clinker from clinker cooler #2 to the aumond conveyor, identified as EU30, constructed in 1977, with a nominal throughput of 150 tons per hour, with emissions controlled by a baghouse, identified as baghouse 233, and exhausting to one (1) stack identified as EP25.
- (62) One (1) aumond conveyor used for transferring clinker from the #2 clinker drag conveyor to the clinker can #2 or the cross belt, identified as EU31, constructed in 1977, with a nominal throughput of 150 tons per hour, with emissions controlled by two baghouses, identified as baghouse 234, exhausting to one (1) stack identified as EP26 and baghouse 31382, exhausting to one (1) stack identified as EPN1.
- (63) One (1) cross belt for transferring clinker from the aumond conveyor to the long belt, identified as EU119, constructed in May 1971, with a nominal throughput of 150 tons per hour, with emissions controlled by a baghouse, identified as baghouse 218, and exhausting to one (1) stack identified as EP20.
- (64) Clinker can #2, which is a vertical bin with a lid used for storing off-spec clinker, identified as EU120, constructed in 1977, with emissions controlled by two baghouses, identified as baghouse 234, exhausting to one (1) stack identified as EP26 and baghouse 31382, exhausting to one (1) stack identified as EPN1.

#### **Clinker Handling to Crane Storage Facilities**

- (65) One (1) long belt for transferring clinker from the apron conveyor and the cross belt to the North clinker transfer tower, identified as EU25, constructed in May 1971, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse 219, and exhausting to one (1) stack identified as EP27.
- (66) One (1) North clinker transfer tower for transferring clinker from the long belt to the covered incline belt (shuttle belt), identified as EU32, constructed in 1972, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse 219, and exhausting to one (1) stack identified as EP27.
- (67) One (1) covered incline belt (Shuttle belt) used for transferring clinker from the North clinker transfer tower to the North clinker storage building, identified as EU33, constructed in 1972, with a nominal throughput of 200 tons per hour, with emissions controlled by a

- baghouse, identified as baghouse 35931, and exhausting to one (1) stack identified as EPN7.
- (68) One (1) clinker storage pile, identified as EU121, created before 1960.
- (69) North clinker storage pile, identified as EU122, created in May 1971.
- (70) North clinker storage building, identified as EU123, constructed in 1960, with emissions controlled by baghouse 35931 and exhausting to stack EPN7.
- (71) One (1) North reclaim clinker covered conveyor system used to transfer clinker from the North clinker storage building and baghouse dust from baghouse 35391 to either, 1) the South reclaim clinker covered conveyor system (EU124) or, 2) the 2D finish mill clinker bin transfer (EU44) transfer tower (covered conveyor), identified as EU34, constructed in 1962, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse 245, and exhausting to one (1) stack identified as EP29.
- (72) One (1) South reclaim clinker covered conveyor used to transfer clinker from the North reclaim clinker covered conveyor system to the crane storage building, identified as EU124, constructed in May 1971, with a nominal throughput of 200 tons per hour, with emissions controlled by two baghouses, identified as baghouse 202, exhausting to one (1) stack identified as EP39 and baghouse 31499, exhausting to one (1) stack identified as EPN2.
- (73) Truck loading station, used for loading material from the North clinker storage pile, identified as EU125, constructed in May 1971, with emissions uncontrolled.
- (74) Truck unloading station, used for loading material to the crane storage building, identified as EU126, constructed in May 1971, with emissions uncontrolled.

## **2ABC Finish Mill Facilities**

- (75) One (1) CKD/Lime tank, identified as EU146, constructed in 1964, with emissions controlled by a baghouse, identified as baghouse 143, and exhausting to one (1) stack identified as EP84.
- (76) One (1) gypsum/stone transfer circuit ABC mills, including material transfers and scales, identified as EU35, constructed in 1964, with a nominal throughput of 300 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 131 and 132, and exhausting to two (2) stacks identified as EP30 and EP31.
- (77) One (1) clinker transfer circuit ABC mills, including conveyor transfers and clinker scales, identified as EU36, constructed in 1964, with a nominal throughput of 200 tons per hour, with emissions controlled by two baghouses, identified as baghouse 31495, exhausting to one (1) stack identified as EPN3, and baghouse 31496, exhausting to one (1) stack, identified as EPN4.
- (78) Two (2) clinker elevators, identified as EU37, constructed in 1969, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse 134, and exhausting to one (1) stack identified as EP34.
- (79) One (1) 2BC finish mill feed belt, identified as EU132, constructed in 1977, with a nominal throughput of 200 tons per hour, with emissions uncontrolled.
- (80) 2A hopper / preliminary ball mill used to grind clinker and gypsum, identified as EU38, constructed in 1948, with a nominal throughput of 24 tons per hour, with emissions controlled by a baghouse, identified as baghouse 133, and exhausting to one (1) stack identified as EP33.

- (81) One (1) finish mill circuit 2A, which includes three (3) elevators, finish mill, separator, and air transport system, collectively identified as EU39, constructed in 1948, with a nominal throughput of 24 tons per hour, with emissions controlled by a baghouse, identified as baghouse 134, and exhausting to one (1) stack identified as EP34.
- (82) One (1) finish mill circuit 2B, which includes the feed hopper, feed belt, finish mill, elevator, and air transport system, collectively identified as EU40, constructed in 1953, with a nominal throughput of 25 tons per hour, with emissions controlled by a baghouse, identified as baghouse 135, and exhausting to one (1) stack identified as EP35.
- (83) One (1) finish mill circuit 2C, which includes the feed hopper, feed belt, finish mill, and elevator, collectively identified as EU42, constructed in 1960, with a nominal throughput of 36 tons per hour, with emissions controlled by a baghouse, identified as baghouse 137, and exhausting to one (1) stack identified as EP37.
- (84) One (1) separator and cement cooler, used in conjunction with the finish mill circuit 2C, identified as EU43, constructed in 1960 and 1964 respectively, with a nominal throughput of 36 tons per hour, with emissions controlled by a baghouse, identified as baghouse 137, and exhausting to one (1) stack identified as EP37.
- (85) One (1) separator and cement cooler, used in conjunction with the finish mill circuit 2B, identified as EU41, constructed in 1953 and 1955 respectively, with a nominal throughput of 25 tons per hour, with emissions controlled by a baghouse, identified as baghouse 135, and exhausting to one (1) stack identified as EP35.
- (86) One (1) BP tank for storing finished product (cement), identified as EU48, constructed in 1965, with a nominal throughput of 700 tons per hour, with emissions controlled by a baghouse, identified as baghouse 144, and exhausting to one (1) stack identified as EP81.
- (87) One (1) pump used to transfer finished product (cement) from the BP tank to silos, identified as EU49, constructed in 1966, with a nominal throughput of 50 tons per hour, with emissions controlled by a baghouse, identified as baghouse 146, and exhausting to one (1) stack identified as EP82.

## **2D Finish Mill Facilities**

- (88) One (1) gypsum elevator used to transfer material from the gypsum storage piles to the clinker draw-up system D mill, identified as EU135, constructed in 1964, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 120, and exhausting to one (1) stack identified as EP40.
- (89) One (1) 2D finish mill clinker bin, which includes the elevator, conveyor belts, and air transport system, identified as EU44, constructed in 1964, with a nominal throughput of 300 tons per hour, with emissions controlled by one (1) baghouses, identified as baghouses 120, and exhausting to stack identified as EP40.
- (90) One (1) 2D finish mill clinker / gypsum feed circuit which includes scales and feed belts, identified as EU45, constructed in 1964, with a nominal throughput of 140 tons per hour, with emissions controlled by three (3) baghouses, identified as baghouse 262, exhausting to one (1) stack identified as EP94, baghouse 31497 exhausting to one (1) stack identified as EPN5, and baghouse 31498 exhausting to one (1) stack identified as EPN6.
- (91) One (1) 2D finish mill roll press circuit, which includes a roller press (crusher), identified as EU46, constructed in 1999, with a nominal throughput of 140 tons per hour, with emissions controlled by three (3) baghouses, identified as baghouses 261, 262, and 263, and exhausting to three (3) stacks identified as EP93, EP94, and EP95.
- (92) One (1) 2D finish mill circuit, which includes conveyor transfer, elevator, finish mill, elevator, classifier, and three (3) cement coolers, identified as EU47, constructed in 1964,

with a nominal throughput of 140 tons per hour, with emissions controlled by a baghouse, identified as baghouse 139, and exhausting to one (1) stack identified as EP41.

#### **Finish Product 501-Silos Storage and Packing Facilities**

- (93) 501-Silos 30-44, identified as EU54, constructed in 1965, with emissions controlled by five (5) baghouses, identified as baghouses 224, 225, 246, 150, and 151, and exhausting to five (5) stacks identified as EP63 through EP67.
- (94) One (1) BIC mixer for mixing lime and pigment with the clinker, identified as EU55, constructed in 1973, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 226, and exhausting to one (1) stack identified as EP68.
- (95) One (1) BIC packer for loading cement into bags, identified as EU56, constructed in 1973, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 226, and exhausting to one (1) stack identified as EP68.

#### **Finish Product 506-Silos Storage, Packing, and Bulk Loading Facilities**

- (96) 506-Silos 56-73, identified as EU53, constructed in 1958, with emissions controlled by fourteen (14) baghouses, identified as baghouses 159 through 172, and exhausting to fourteen (14) stacks identified as EP49 through EP62.
- (97) Two (2) bulk loading stations for railroad cars and trucks, identified as EU57 and EU58, constructed in 1954, each with a nominal throughput of 200 tons per hour, with emissions controlled by baghouses 176 and 177 respectively, and exhausting to stacks EP69 and EP70 respectively.
- (98) One (1) packer #1 for loading cement into bags, identified as EU59, constructed in 1960, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 173, and exhausting to one (1) stack identified as EP71.
- (99) One (1) packer #2 for loading cement into bags, identified as EU60, constructed in 1960, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 174, and exhausting to one (1) stack identified as EP72.
- (100) One (1) packer #3 for loading cement into bags, identified as EU61, constructed in 1960, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 175, and exhausting to one (1) stack identified as EP73.
- (101) One (1) bag compression station, identified as EU62, constructed in 1960, with a nominal throughput of 45 tons per hour, with emissions controlled by a baghouse, identified as baghouse 242, and exhausting to one (1) stack identified as EP74.

#### **Finish Product 504-Silos Storage and Bulk Loading Facilities**

- (102) 504-Silos 45-48, and 50-55, identified as EU51, constructed in 1959, with emissions controlled by four (4) baghouses, identified as baghouses 153 through 156, and exhausting to four (4) stacks identified as EP44 through EP47.
- (103) One (1) bulk loading station for trucks and railroad cars, identified as EU52, constructed in 1959, with a nominal throughput of 200 tons per hour, with emissions controlled by baghouse 152, and exhausting to stack EP48.
- (104) 504 Silos Bank/Silo 49 (CKD sales), identified as EU153, constructed in 1959, with emissions controlled by a baghouse, identified as baghouse 264 and exhausting to stack EP96.

- (105) CKD sales loadout spout, identified as EU154, constructed in 1999, with emissions controlled by a baghouse, identified as baghouse 265 and exhausting to stack EP97.

### **Finish Product 502-Silos Storage and Bulk Loading Facilities**

- (106) 502-Silos 1, 2, and 7-11, identified as EU50, constructed in 1966, with emissions controlled by two (2) baghouses, identified as baghouses 148 and 149 respectively, and exhausting to two (2) stacks identified as EP42 and EP43.

### **Raw Mill Facilities**

- (107) Two (2) pneumatic truck unloading stations to additive bins, identified as EU107 and EU108, constructed in July 1976, with emissions controlled by one (1) baghouse, identified as baghouse 228, and exhausting to stack EP09.
- (108) One (1) clay hopper, identified as EU109, constructed in July 1976, with emissions uncontrolled.
- (109) Three (3) additive bins for flyash, bottom ash, or iron, identified as EU10, EU11, and EU12 respectively, equipped with two (2) elevators, constructed in 1977, with emissions controlled by one (1) baghouse, identified as baghouse 228 and exhausting to stack EP09. One of the elevators was replaced in 1994.
- (110) One (1) C-15 covered conveyor system for transferring material from the clay breaker, additive bin 2, and the main limestone storage pile to the triple gate, identified as EU09, constructed in 1977, with a nominal throughput of 300 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 227 and 229, and exhausting to stacks EP07 and EP08 respectively.
- (111) One (1) Loesche raw mill, identified as EU14, constructed in 1977, with a nominal throughput of 300 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 15, and exhausting to stack S-15.
- (112) One (1) sidewinder (pneumatic transfer pump) used for pumping the kiln feed from silos to triple gate, identified as EU15, constructed in 1977, with a nominal throughput of 300 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 247 and exhausting to stack EP-11.
- (113) One (1) raw material pile, identified as EU112.
- (114) One (1) oil-fired furnace, referred to as the Todd Furnace, used for Loesche mill heating, identified as EU13, constructed in 1977, with a nominal heat input capacity of 55 million British thermal units per hour, with emissions controlled by one (1) baghouse, identified as baghouse 15, and exhausting to stack S-15.
- (115) Blend silo #1 for blending kiln feed, identified as EU16, constructed in May 1971, with emissions controlled by one (1) baghouse, identified as baghouse 211, and exhausting to stack EP12.
- (116) Blend silo #2 for blending kiln feed, identified as EU17, constructed in 1977, with emissions controlled by one (1) baghouse, identified as baghouse 230, and exhausting to stack EP13
- (117) One (1) calibration system, identified as EU18, constructed in May 1971, with emissions controlled by one (1) baghouse, identified as baghouse 212, and exhausting to stack EP14.

### **Coal handling, milling and storage facilities**

- (118) Coal (crusher) mill #1, identified as EU66 servicing kiln #1, constructed in May 1971, with a nominal throughput of 12.5 tons per hour, with emissions routed to kiln #1 and controlled by baghouse 221 and exhausting to one (1) stack, identified as (EP16) S-14. Note: For the purposes of NSPS Subpart Y applicability, this is also a thermal dryer.
- (119) Coal (crusher) mill #2, identified as EU67 servicing kiln #2, constructed in 1977, with a nominal throughput of 14 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 252, and exhausting to stack EP88. Note: For the purposes of NSPS Subpart Y applicability, this is also a thermal dryer.
- (120) One (1) fuel oil-fired air heater for kiln #1 coal mill, identified as EU68, constructed in May 1971, with a nominal heat input capacity of 5.3 million British thermal units per hour, with emissions exhausting directly to the kiln #1 coal mill then routed to kiln #1 and controlled by one (1) baghouse, identified as baghouse 221 and exhausting to stack S-14.
- (121) One (1) fuel oil-fired air heater for kiln #2 coal mill, identified as EU69, constructed in 1977, with a nominal heat input capacity of 5.3 million British thermal units per hour, with emissions exhausting directly to the kiln #2 coal mill controlled by one (1) baghouse, exhausting to stack EP88.
- (122) Kiln #2 coal dust silo, identified as EU149, constructed in 1996, with emissions controlled by one baghouse with a nominal air flow rate of 200 actual cubic feet per minute, identified as baghouse 253 and exhausting to one (1) stack identified as EP101.
- (123) Kiln #2 coal weigh system, identified as EU150, constructed in 1996, with a nominal throughput of 20 tons per hour, with emissions controlled by one filter, identified as filter 254 and exhausting to a vent.
- (124) Kiln #2 coal handling system, identified as EU151, constructed in 1996, with a nominal throughput of 20 tons per hour, with emissions controlled by one filter, identified as filter 255 and exhausting to a vent.

### **The kiln #1 and kiln #2 facilities**

- (125) One (1) feed system for kiln #1, identified as EU19, constructed in May 1971, with a nominal throughput of 105 tons per hour, with PM emissions from the alleviator controlled by one (1) baghouse, identified as baghouse 209 and exhausting to stack EP15 and with PM emissions from the scales and pump controlled by one (1) baghouse, identified as baghouse 212 and exhausting to stack EP12.
- (126) One (1) long dry process rotary cement kiln #1, identified as EU20, constructed in May 1971, with a nominal heat input capacity of 184 million Btu per hour, with a nominal production rate of 60 tons per hour (as clinker), with PM emissions controlled by one (1) baghouse, identified as baghouse 221, and exhausting to one (1) stack, identified as S-14.
- (127) One (1) feed system for kiln #2, identified as EU26, constructed in 1977, with a nominal throughput of 175 tons per hour, with PM emissions controlled by one (1) baghouse, identified as baghouse 231, and exhausting to stack EP80.
- (128) One (1) dry process rotary cement kiln #2 and associated preheater unit, equipped with an alkali bypass, identified as EU27, constructed in 1977, with a nominal heat input capacity of 302 million Btu per hour, with a nominal production rate of 105 tons per hour (as clinker), with PM emissions controlled by two (2) baghouses, identified as baghouse 15 and baghouse 16 (alkali bypass system), and exhausting to stacks S-15 and S-16, respectively.

- (129) One (1) Elevator/dust tank (alkali bypass) for kiln #2, identified as EU28, constructed in 1977, with emissions controlled by a baghouse, identified as baghouse 232, and exhausting to stack EP23.

**The clinker cooler #1 facilities**

- (130) One (1) grate clinker cooler #1, identified as EU22, constructed in May 1971, with a nominal throughput rate of 60 tons per hour, with PM emissions controlled by one (1) baghouse, identified as baghouse 222, and exhausting to one (1) stack, identified as S-13.

**The clinker cooler #2 facilities**

- (131) One (1) grate clinker cooler #2, identified as EU29, constructed in 1977, with a nominal throughput of 105 tons per hour, with PM emissions controlled by one (1) baghouse, identified as baghouse 17, and exhausting to one (1) stack, identified as S-17.

A.4 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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

- (1) Degreasing operations. [326 IAC 8-3-2] [326 IAC 8-3-5] [326 IAC 8-3-8]
- (2) Underground conveyors; [326 IAC 6-1-2]
- (3) Coal bunker and coal scale exhausts and associated dust collector vents; [326 IAC 6-1-2]

This stationary source also includes other insignificant activities as defined at 326 IAC 2-7-1(21) identified in the Technical Support Document for this permit that are not specifically regulated hereunder.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

- (1) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (2) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

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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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

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- (a) This permit, T019-6016-00008, 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) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### B.3 Term of Conditions [326 IAC 2-1.1-9.5]

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Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

### B.4 Enforceability [326 IAC 2-7-7]

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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 Severability [326 IAC 2-7-5(5)]

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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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

### B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

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- (a) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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- (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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (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 no later than July 1st of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) 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 PMPs does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

#### B.11 Emergency Provisions [326 IAC 2-7-16]

- (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.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 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 Number: 1-800-451-6027 (ask for Office of Air Quality,

Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865

- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The

Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to any nonapplicability determinations set forth in the D sections of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- Construction Permit CP 019-3340-00008, issued on September 5, 1997, which allowed the source to burn waste tires as a fuel in their kilns, was voluntarily withdrawn by the source. The source is not permitted to burn waste tires.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T019-6016-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized official" 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.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]

- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
  - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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 2-7 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 being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]

- (a) A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-2.4.

B.22 Inspection and Entry [326 IAC 2-7-6] [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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251
- The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

## SECTION C SOURCE OPERATION CONDITIONS

### Entire Source

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]**

Pursuant to 326 IAC 6-3-2(e), 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.

**C.2 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 forty percent (40%) 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.3 Open Burning [326 IAC 4-1] [326 IAC 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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

**C.5 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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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.7 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  
MC 61-52 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.8 Performance Testing [326 IAC 3-6]**

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- (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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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 ninety (90) 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  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the

case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (c) Conditions (a) and (b) above do not apply to continuous opacity monitoring equipment.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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On and after 90 days following the issuance of SPM 019-21450-00008:

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
  - (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
  - (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
  - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
  - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-51 IGCN 1003  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]**

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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) If there is a reasonable possibility that a “project” (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-3 (ll)) at an existing emissions unit, other than projects at a Clean Unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(ee) and 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(rr) and 326 IAC 2-3-3 (mm)), the Permittee shall comply with following:
- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and
      - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
  - (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

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- (a) The Permittee 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 “responsible official” as defined by 326 IAC 2-7-1(34).
- (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 Data Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any project (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
  - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
  - (1) The name, address, and telephone number of the major stationary source.
  - (1) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (2) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report:

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-50 IGCN 1003  
Indianapolis, Indiana 46204-2251

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.21 Compliance with 40 CFR 82 and 326 IAC 22-1**

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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 2-7-5(15)] Note: Complete facility descriptions are in Section A.2.

### Quarry activities

- (1) Quarry drilling, identified as EU01.
- (2) Quarry blasting, identified as EU75.
- (3) Raw material (limestone) loading to trucks, identified as EU76.

### Raw material stockpile operations

- (4) Raw material (clay overburden) unloading to strippings stockpile, identified as EU78.
- (5) Strippings stockpile, identified as EU145.
- (6) Truck unloading to additive hopper or additive storage pile, identified as EU99.
- (7) Silica/Alumina/Iron additive storage pile, identified as EU100.
- (8) Additive clay blend pile, identified as EU101.
- (9) Truck unloading to clay storage piles, identified as EU102.
- (10) Uncovered clay storage pile, identified as EU103.
- (11) Covered clay storage pile, identified as EU104.

### Raw Material Sizing Operations

- (12) Raw material unloading to stone surge pile or primary crusher, identified as EU80.
- (13) Stone surge pile, identified as EU81.
- (14) One (1) primary crusher, identified as EU82.
- (15) One (1) covered conveyor belt, identified as EU83.
- (16) Screens, identified as EU84.
- (17) One (1) secondary crusher, identified as EU02.
- (18) Covered conveyor, identified as EU03.
- (19) Two (2) tertiary crushers, identified as EU04 and EU04a.
- (20) One (1) conveyor used to bypass tertiary crusher, identified as EU05.
- (21) One (1) covered conveyor, identified as EU85.
- (22) One (1) traveling belt, identified as EU86.
- (23) North stone bin, identified as EU06.
- (24) South stone bin, identified as EU07.
- (25) Stone conveyor transfer to truck, identified as EU87.
- (26) One (1) truck unloading station to crushed limestone storage pile, identified as EU89.
- (27) One (1) truck loading station from crushed limestone storage pile, identified as EU91.
- (28) One (1) truck unloading station to truck dump hopper, identified as EU93.
- (29) One (1) truck unloading station to emergency limestone storage pile, identified as EU94.
- (30) Crushed limestone storage piles, identified as EU90.
- (31) Emergency limestone storage pile, identified as EU95.
- (32) One (1) truck dump hopper, identified as EU96.
- (33) One (1) limestone conveyor, identified as EU97.
- (34) Main limestone storage pile, identified as EU98.

### Kiln #1 Cement Kiln Dust (CKD) Operations

- (35) One (1) dust tank system, identified as EU21.
- (36) Truck loading from the dust tank system, identified as EU113.
- (37) CKD storage pile, identified as EU118.
- (38) CKD sales loadout spout (kiln #1 dust tank), identified as EU155.

### Kiln #2 Cement Kiln Dust (CKD) Operations

- (39) Truck loading from the elevator dust tank, identified as EU115.
- (40) Truck unloading to CKD storage pile, identified as EU117.

(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 2-7-5(1)]**

### **D.1.1 Particulate Matter (PM) [326 IAC 6.5-1-2][326 IAC 2-2]**

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- (a) Pursuant to 326 IAC 6.5-1-2, the PM emissions from each of the raw material sizing operations, the kiln #1 cement kiln dust (CKD) operations, and the kiln #2 cement kiln dust (CKD) operations shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (b) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the PM10 emissions from the baghouse controlling the CKD sales loadout spout (kiln #1 dust tank) (EU155) shall not exceed 0.65 pounds per hour and the PM emissions shall not exceed 1.08 pounds per hour. Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply.
- (c) In order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the number of holes drilled by the quarry drilling process shall not exceed 38,000 per 12 consecutive month period and the PM emissions shall not exceed 1.3 pounds per hole. Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply.

### **D.1.2 Determinations of Nonapplicability [40 CFR 60, Subparts A, F, and OOO] [40 CFR 63, Subparts A and LLL]**

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- (a) None of the quarry activities, raw material stockpile operations, or raw material sizing operations listed in this section are subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because they are not affected facilities under this rule.
- (b) None of the cement kiln dust operations listed in this section are subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants), because they are not considered affected facilities under this rule.
- (c) None of the quarry activities, raw material stockpile operations, or raw material sizing facilities/emission units listed in this section are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subparts A and LLL, because they are not affected facilities under this rule.
- (d) None of the cement kiln dust operations listed in this section are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subparts A and LLL, because they are not considered affected facilities under this rule.
- (e) None of the facilities/emission units listed in this section are subject to the requirements of the NSPS, 40 CFR 60, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) because they were constructed prior to the applicability date of August 31, 1983.

### **D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices listed in this section.

## **Compliance Determination Requirements**

### **D.1.4 Particulate Matter (PM) Control**

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- (a) Except as otherwise provided by statute, rule, or this permit, in order to comply with the limits in Condition D.1.1, each baghouse for PM control shall be in operation at all times when its associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will

be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

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Within 180 days after issuance of this Part 70 permit, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM and PM10 testing on baghouse 266 controlling the CKD sales loadout spout (kiln #1 dust tank) (EU155) utilizing methods as approved by the Commissioner. PM10 includes filterable and condensable PM10. Testing shall be conducted in accordance with Section C- Performance Testing. All associated facilities exhausting to a single stack must all be operating when determining compliance with the limit.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.6 Visible Emissions Notations**

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- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are present.
- (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 visible emissions for that specific process.
- (e) If visible emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

**D.1.7 Parametric Monitoring**

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The Permittee shall record the pressure drop across each baghouse, used in conjunction with the facilities listed in this section, at least once per day when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument 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 Broken or Failed Bag Detection**

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or

replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

#### D.1.9 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations required by that condition.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the pressure drop readings required by that condition.
- (c) To document compliance with Condition D.1.1(c), the Permittee shall maintain records of the number of holes drilled at the quarry.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

#### D.1.10 Reporting Requirements

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A quarterly summary of the information to document compliance with the limit specified in Condition D.1.1(c) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. This report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]** Note: Complete facility descriptions are in Section A.2.

### Miscellaneous Facilities

- (41) Plant Roads, identified as EU152.
- (42) Vacuum system, identified as EU73.
- (43) One (1) warehouse conveyor system for conveying bagged cement, identified as EU74.

### Clay Processing Operations

- (44) Clay hopper, identified as EU105.
- (45) One (1) covered conveyor system, identified as EU106.
- (46) One (1) clay crusher, identified as EU08.

### Finish Operations Crane Storage Facilities

- (47) Emergency BP stone storage pile, identified as EU128.
- (48) One (1) truck unloading station, identified as EU127.
- (49) One (1) truck unloading station to gypsum storage piles, identified as EU129.
- (50) Crane storage building, identified as EU131.
- (51) Gypsum storage piles, identified as EU130 and EU134.

### Fossil Fuel Storage and Handling Facilities

- (52) One (1) truck unloading station to the reserve coal storage pile, identified as EU136 .
- (53) One (1) reserve coal storage pile, identified as EU137.
- (54) One (1) coal storage pile, identified as EU142.
- (55) One (1) coal draw-up covered conveying system, identified as EU63.
- (56) Coal transfer tower, identified as EU64.
- (57) One (1) coal bin, identified as EU65.

### Kiln #1 Clinker Handling Facilities

- (58) One (1) #1 clinker drag conveyor, identified as EU23.
- (59) Apron conveyor, identified as EU24.
- (60) Clinker can #1, identified as EU114.

### Kiln #2 Clinker Handling Facilities

- (61) One (1) #2 clinker drag conveyor, identified as EU30.
- (62) One (1) aumond conveyor, identified as EU31.
- (63) One (1) cross belt, identified as EU119.
- (64) Clinker can #2, identified as EU120.

### Clinker Handling to Crane Storage Facilities

- (65) One (1) long belt, identified as EU25.
- (66) One (1) North clinker transfer tower, identified as EU32.
- (67) One (1) covered incline belt (Shuttle belt), identified as EU33.
- (68) One (1) clinker storage pile, identified as EU121.
- (69) North clinker storage pile, identified as EU122.
- (70) North clinker storage building, identified as EU123.
- (71) One (1) North reclaim clinker covered conveyor system, identified as EU34.
- (72) One (1) South reclaim clinker covered conveyor, identified as EU124.
- (73) Truck loading station, identified as EU125.
- (74) Truck unloading station, identified as EU126.

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

**Facility Description [326 IAC 2-7-5(15)]** continued Note: Complete facility descriptions are in Section A.2.

**Clinker Handling to Crane Storage Facilities**

- (65) One (1) long belt, identified as EU25.
- (66) One (1) North clinker transfer tower, identified as EU32.
- (67) One (1) covered incline belt (Shuttle belt), identified as EU33.
- (68) One (1) clinker storage pile, identified as EU121.
- (69) North clinker storage pile, identified as EU122.
- (70) North clinker storage building, identified as EU123.
- (71) One (1) North reclaim clinker covered conveyor system, identified as EU34.
- (72) One (1) South reclaim clinker covered conveyor, identified as EU124.
- (73) Truck loading station, identified as EU125.
- (74) Truck unloading station, identified as EU126.

**2ABC Finish Mill Facilities**

- (75) One (1) CKD/Lime tank, identified as EU146.
- (76) One (1) gypsum/stone transfer circuit ABC mills, identified as EU35.
- (77) One (1) clinker transfer circuit ABC mills, identified as EU36.
- (78) Two (2) clinker elevators, identified as EU37.
- (79) One (1) 2BC finish mill feed belt, identified as EU132.
- (80) 2A hopper / preliminary ball mill used to grind clinker and gypsum, identified as EU38.
- (81) One (1) finish mill circuit 2A, identified as EU39.
- (82) One (1) finish mill circuit 2B, identified as EU40.
- (83) One (1) finish mill circuit 2C, identified as EU42.
- (84) One (1) separator and cement cooler, identified as EU43.
- (85) One (1) separator and cement cooler, identified as EU41.
- (86) One (1) BP tank for storing finished product (cement), identified as EU48.
- (87) One (1) pump used to transfer material from the BP tank to silos, identified as EU49.

**Finish Mill 2 Facilities**

- (88) One (1) gypsum elevator, identified as EU135.
- (89) One (1) 2D finish mill clinker bin, identified as EU44.
- (90) One (1) 2D finish mill clinker / gypsum feed circuit, identified as EU45.
- (91) One (1) 2D finish mill roll press circuit, identified as EU46.
- (92) One (1) 2D finish mill circuit, identified as EU47.

**Finish Product 501-Silos Storage and Packing Facilities**

- (93) 501-Silos 30-44, identified as EU54.
- (94) One (1) BIC mixer for mixing lime and pigment with the clinker, identified as EU55.
- (95) One (1) BIC packer for loading cement into bags, identified as EU56.

**Finish Product 506-Silos Storage, Packing, and Bulk Loading Facilities**

- (96) 506-Silos 56-73, identified as EU53.
- (97) Two (2) bulk loading stations for railroad cars and trucks, identified as EU57 and EU58.
- (98) One (1) packer #1 for loading cement into bags, identified as EU59.
- (99) One (1) packer #2 for loading cement into bags, identified as EU60.
- (100) One (1) packer #3 for loading cement into bags, identified as EU61.
- (101) One (1) bag compression station, identified as EU62.

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

**Facility Description [326 IAC 2-7-5(15)] continued** Note: Complete facility descriptions are in Section A.2.

**Finish Product 504-Silos Storage and Bulk Loading Facilities**

- (102) 504-Silos 45-48, and 50-55, identified as EU51.
- (103) One (1) bulk loading station for trucks and railroad cars, identified as EU52.

**Finish Product 504-Silos Storage and Bulk Loading Facilities (continued)**

- (104) 504 Silos Bank/Silo 49 (CKD sales), identified as EU153.
- (105) CKD sales loadout spout, identified as EU154.

**Finish Product 502-Silos Storage and Bulk Loading Facilities**

- (106) 502-Silos 1, 2, and 7-11, identified as EU50.

(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 2-7-5(1)]**

**D.2.1 Particulate Matter (PM) Limitations [326 IAC 6.5-1-2]**

Pursuant to 326 IAC 6.5-1-2, the PM emissions from each of the miscellaneous facilities, clay processing operations, finish operations crane storage facilities, fossil fuel storage and handling facilities, kiln #1 clinker handling facilities, kiln #2 clinker handling facilities, clinker handling to crane storage facilities, 2ABC finish mill facilities, finish mill #2 facilities, finish product 501-silos storage and packing facilities, finish production 506- silos storage, packing, and bulk loading facilities, finish product 504-silos storage and bulk loading facilities, and finish product 502-silos storage and bulk loading facilities shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air.

**D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]**

Except when otherwise specified in 40 CFR Part 63, Subpart LLL, the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to all of the facilities described in this section, except for the open/unenclosed material stockpiles and haul roads.

**D.2.3 NESHAP Emissions Limitation [40 CFR 63, Subpart LLL] [326 IAC 20-27-1]**

The NESHAP 40 CFR 63, Subpart LLL and 326 IAC 20-27-1 applies to all of the emission units listed in this section, except for the open/unenclosed material stockpiles and haul roads. Pursuant to 40 CFR 63.1348 (Emissions Standards and Operating Limits), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, the visible emissions from each of the affected facilities listed in this section shall not exceed ten percent (10%) opacity.

**D.2.4 Determinations of Nonapplicability [40 CFR 60, Subparts A and F]**

Emission units EU63 through EU65, EU30 through EU33, EU120, EU132, EU46, EU73, EU74, EU55 and EU56 are not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because the requirements of the NESHAP 40 CFR 63 Subpart LLL superseded the requirements of the NSPS on June 14, 2002. None of the other facilities listed in this are subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because they are not affected facilities under this rule, or they were constructed prior to the applicability date of August 17, 1971.

**D.2.5 Prevention of Significant Deterioration (PSD) [326 IAC 2-2]**

In order to render the requirements of PSD not applicable, the following conditions shall apply:

- (a) The PM emissions from baghouses 261, 262, 31497, 31498, and 263 controlling the 2D finish mill roll press circuit (EU46) shall not exceed 4.53 pounds per hour (limit for all three baghouses combined).
- (b) The PM10 emissions from baghouses 261, 262, 31497, 31498 and 263 controlling the 2D finish mill roll press circuit (EU46) shall not exceed 2.71 pounds per hour (limit for all three baghouses combined).
- (c) The PM emissions from baghouse 249 controlling the warehouse conveyor system (EU74) shall not exceed 4.58 pounds per hour.
- (d) The PM emissions from baghouse 250 controlling the vacuum system (EU73) shall not exceed 1.11 pounds per hour.
- (e) The PM emissions from baghouse 265 controlling the CKD sales loadout spout (EU154) shall not exceed 1.15 pounds per hour.
- (f) The PM10 emissions from baghouse 265 controlling the CKD sales loadout spout (EU154) shall not exceed 0.69 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

**D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [40 CFR 63, Subpart LLL]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the control devices listed in this section.

**Compliance Determination Requirements**

**D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 60, Subpart F] [40 CFR 63, Subpart LLL]**

- (a) No later than 180 days after June 14, 2002, which is the compliance date for the Portland Cement Manufacturing Industry NESHAP, the Permittee shall demonstrate compliance with the limits established in Condition D.2.3 by conducting a test in accordance with 40 CFR 63.1349, Method 9 of 40 CFR Part 60, Appendix A, and Section C - Performance Testing.
- (b) In order to demonstrate compliance with Conditions D.2.5 and D.2.1, the Permittee shall perform testing on the facilities listed in the following table, utilizing methods as approved by the Commissioner. These tests shall be conducted within 180 days after issuance of this Part 70 permit.

Processes	Control Device ID	Pollutants to test
vacuum system (EU73)	baghouse 250	PM
warehouse conveyor system (EU74)	baghouse 249	PM
CKD sales loadout spout (kiln #1 dust tank) (EU155)	baghouse 266	PM
south reclaim clinker covered conveyor (EU124)	baghouse 120	PM
2D finish mill clinker bin (EU44) and gypsum elevator (EU135)	baghouse 120	PM
2D finish mill roll press circuit (EU46)	baghouses	

Processes	Control Device ID	Pollutants to test
and 2D finish mill clinker / gypsum feed circuit (EU45)	261, 262, and 263	PM and PM10
2D finish mill circuit (EU47)	baghouse 139	PM
CKD sales loadout spout (EU154)	baghouse 265	PM
Elevators (2) (EU37) 2A finish mill circuit (EU39)	baghouse 134	PM
Separator and Cement cooler (EU41)	baghouse 136	PM
Sidewinder (EU15)	baghouse 247	PM
Blend silo #2 (EU17)	baghouse 230	PM
CKD/Lime tank (EU146)	baghouse 143	PM
calibration system (EU18)	baghouse 212	PM

PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing. All associated facilities exhausting to a single stack must all be operating when determining compliance with the limit.

**D.2.8 Particulate Matter (PM) Control**

- (a) Except as otherwise provided by statute, rule, or this permit, in order to comply with conditions D.2.1, D.2.3, and D.2.5, each baghouse for PM control shall be in operation at all times when its associated facility is in operation.
- (b) In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.2.9 NESHAP Monitoring Requirements [40 CFR 63, Subpart LLL][326 IAC 20-27-1]**

- (a) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall prepare a written operations and maintenance plan for each affected source by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. The plan shall include the following information:
  - (1) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emissions limit in Condition D.2.3; and
  - (2) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348. Such procedures must include the following provisions:

- (A) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source except for the finish mills, in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
- (B) If no visible emissions are observed in six consecutive monthly tests for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
- (C) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
- (D) If visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40 CFR 60, Appendix A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.

(3) Corrective actions to be taken when required by paragraph (b).

Failure to comply with any provision of the operations and maintenance plan shall be a violation of the standard.

- (b) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall monitor opacity from the finish mills by conducting daily visual emissions observations of the mill sweep and air separator particulate matter control devices (PMCDs), in accordance with the procedures of 40 CFR 60, Appendix A, Method 22. The Method 22 test shall be conducted while the affected source is operating at the representative performance conditions. The duration of the Method 22 test shall be six minutes. If visible emissions are observed during any Method 22 visible emissions test, the Permittee must initiate, within one (1) hour, the corrective actions specified in the site specific operations and maintenance plan developed in accordance with 40 CFR 63.1350(a)(1) and (a)(2); and conduct a follow-up Method 22 test. If visible emissions are observed, then within 24 hours of the end of the Method 22 test in which the visible emissions were observed, the Permittee must conduct a followup Method 22 test of each stack from which visible emissions were observed during the previous Method 22 test. If visible emissions are observed during the followup Method 22 test, the Permittee must conduct a visual opacity test of each stack from which visible emissions were observed during the followup Method 22 test, in accordance with 40 CFR 60, Appendix A, Method 9. The duration of the Method 9 test shall be thirty (30) minutes.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.10 Visible Emissions Notations**

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- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are present.
  - (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 visible emissions for that specific process.
- (e) On days that the NESHAP, 40 CFR 63, Subpart LLL, monitoring required in Condition D.2.9 is performed, the Permittee may use those results to satisfy the requirements of this condition for the units subject to the NESHAP.
- (f) If visible emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

#### D.2.11 Baghouse Parametric Monitoring

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The Permittee shall record the pressure drop across each baghouse, used in conjunction with the facilities listed in this section, at least once per day when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the normal-range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

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

#### D.2.12 Broken or Failed Bag Detection

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- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has 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).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.2.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.2.10, the Permittee shall maintain records of visible emission notations required by that condition. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain records of the pressure drop readings required by that condition. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

- (c) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
  - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
  - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
    - (i) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
    - (ii) All records of applicability determination, including supporting analyses.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.14 Reporting Requirements

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- (a) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
  - (1) The plan required by Condition D.2.9 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry.
  - (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
  - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
  - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
  - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, and the source exceeds any applicable emission limitation in the relevant emission standard, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317) 233-0178 or facsimile (FAX) transmission at (317) 233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.

- (b) In addition to being submitted to the address listed in Section C - General Reporting Requirements, all reports and the operation and maintenance plan submitted pursuant to 40 CFR 63, Subpart A shall also be submitted to the U.S. EPA at the following address:

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

Pursuant to 40 CFR 63.10(d)(5)(i) and (ii), the reports submitted by the Permittee shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3 FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]** Note: Complete facility descriptions are in Section A.2.

### Raw Mill Facilities

- (107) Two (2) pneumatic truck unloading stations to additive bins, identified as EU107 and EU108.
- (108) One (1) clay hopper, identified as EU109.
- (109) Three (3) additive bins for flyash, bottom ash, or iron, identified as EU10, EU11, and EU12, equipped with two elevators.
- (110) One (1) C-15 covered conveyor system, identified as EU09.
- (111) One (1) Loesche raw mill with a triple gate, identified as EU14.
- (112) One (1) sidewinder (pneumatic transfer pump), identified as EU15.
- (113) One (1) raw material pile, identified as EU112.
- (114) One (1) oil-fired Todd furnace used for heating the Loesche raw mill, identified as EU13.
- (115) Blend silo #1 for blending kiln feed, identified as EU16.
- (116) Blend silo #2 for blending kiln feed, identified as EU17.
- (117) One (1) calibration system, identified as EU18.

### Coal handling, milling and storage facilities

- (118) Coal (crusher) mill #1, identified as EU66.
- (119) Coal (crusher) mill #2, identified as EU67.
- (120) One (1) fuel oil-fired air heater for kiln #1 coal mill, identified as EU68.
- (121) One (1) fuel oil-fired air heater for kiln #2 coal mill, identified as EU69.
- (122) Kiln #2 coal dust silo, identified as EU149.
- (123) Kiln #2 coal weigh system, identified as EU150.
- (124) Kiln #2 coal handling system, identified as EU151.

### The kiln #1 and kiln #2 facilities

- (125) One (1) feed system for kiln #1, identified as EU19.
- (126) One (1) long dry process rotary cement kiln #1, identified as EU20.
- (127) One (1) feed system for kiln #2, identified as EU26.
- (128) One (1) dry process rotary cement kiln #2 and associated preheater unit, equipped with an alkali bypass, identified as EU27.
- (129) One (1) Elevator/dust tank (alkali bypass) for kiln #2, identified as EU28.

### The clinker cooler #1 facilities

- (130) One (1) grate clinker cooler #1, identified as EU22.

### The clinker cooler #2 facilities

- (131) One (1) grate clinker cooler #2, identified as EU29.

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

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.3.1 Particulate Matter (PM) [326 IAC 6.5-2-4]

Pursuant to 326 IAC 326 IAC 6.5-2-4, the following conditions shall apply:

- (1) The combined particulate matter emissions from the kiln #2 system which includes kiln #2 (EU27), kiln #2 alkali bypass (EU28), the fuel oil-fired air heater for kiln #2 (EU69), and clinker cooler #2 (EU29), shall not exceed 265.20 tons per year and 0.4 pound per ton of kiln feed (dry basis).
- (2) The combined particulate matter emissions from the kiln #1 system, which includes kiln #1 (EU20), the fuel oil-fired air heater (EU68), and clinker cooler #1 (EU22), shall not exceed 251.20 tons per year and 0.58 pound per ton of kiln feed (dry basis).

D.3.2 Particulate Matter (PM) [326 IAC 6.5-1-2] [326 IAC 2-2] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC 326 IAC 6.5-1-2, the following conditions shall apply:
- (1) The particulate matter emissions from the kiln #2 feed system (EU26) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
  - (2) The particulate matter emissions from the kiln #1 feed system (EU19) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
  - (3) The PM emission rate from each of the coal handling, milling and storage facilities (EU66, EU67, EU149, EU150, and EU151) shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
  - (4) The PM emission rate from each of the raw mill facilities shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.
- (b) In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the following conditions shall apply:
- (1) The PM emissions from filter 255 controlling the kiln #2 coal handling system (EU151) shall not exceed 0.27 pounds per hour.
  - (2) The PM10 emissions from filter 255 controlling the kiln #2 coal handling system (EU151) shall not exceed 0.16 pounds per hour.
  - (3) The PM emissions from baghouse 253 controlling the kiln #2 coal dust silo (EU149) shall not exceed 3.65 pounds per hour.
  - (4) The PM10 emissions from baghouse 253 controlling the kiln #2 coal dust silo (EU149) shall not exceed 2.19 pounds per hour.
  - (5) The PM emissions from filter 254 controlling the kiln #2 coal weigh system (EU150) shall not exceed 0.68 pounds per hour.
  - (6) The PM10 emissions from filter 254 controlling the kiln #2 coal weigh system (EU150) shall not exceed 0.41 pounds per hour.
  - (7) The PM emissions from baghouse 228 controlling the elevator for transferring material from the hopper to the additive bin shall not exceed 5.68 pounds per hour.
  - (8) The PM10 emissions from baghouse 228 controlling the elevator for transferring material from the hopper to the additive bin shall not exceed 3.40 pounds per hour.

Therefore, the requirements of 326 IAC 2-2 (PSD) shall not apply.

D.3.3 Sulfur Dioxide (SO<sub>2</sub>) [326 IAC 7-1.1-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the combustion of coal or the simultaneous combustion of coal and oil, in kiln #1 and kiln #2 shall not exceed six (6.0) pounds per MMBtu heat input. Compliance shall be demonstrated on a calendar month average.
- (b) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from the combustion of fuel oil only from each of the kilns shall not exceed five tenths (0.5) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

- (c) Pursuant to 326 IAC 7-1.1 (SO<sub>2</sub> Emissions Limitations) the SO<sub>2</sub> emissions from each of the fuel oil-fired furnaces (EU68, and EU69) and the Todd furnace (EU13) shall not exceed 0.5 pound per million Btu of heat input when combusting fuel oil. Compliance shall be demonstrated on a calendar month average.

D.3.4 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the raw mill facilities, the kiln #1 feed system (EU19), and the kiln #2 feed system (EU26), the coal handling, milling, and storage facilities (EU66, EU67, EU149, EU150, and EU151), the kiln #1 system, which includes kiln #1 (EU20), the fuel oil-fired air heater for kiln #1 (EU68), and clinker cooler #1 (EU22), and the kiln #2 system which includes kiln #2 (EU27), kiln #2 alkali bypass (EU28), the fuel oil-fired air heater for kiln #2 (EU69), and clinker cooler #2 (EU29), as described in this section except when otherwise specified in 40 CFR Part 63, Subpart LLL.

D.3.5 NESHAP Emissions Limitation [40 CFR Part 63, Subpart LLL]

- (a) Pursuant to 40 CFR 63.1343 (Emissions Standards and Operating Limits), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, kiln #1 and kiln #2 shall be limited as follows:
- (1) The particulate matter (PM) emissions from kiln #1 shall not exceed 0.30 pound per ton of feed (dry basis) to the kiln #1.
  - (2) The combined particulate matter emissions from the kiln #2 (EU27), the fuel oil-fired air heater for kiln #2 (EU69), and kiln #2 alkali bypass (EU28) shall not exceed 0.30 pound per ton of feed (dry basis) to the kiln #2.
  - (3) Visible emissions from kiln #1 shall be limited to twenty percent (20%) opacity.
  - (4) When kiln #2 and the Loesche raw mill (EU14) are both operating, the visible emissions from the baghouse controlling the Loesche raw mill and kiln #2 shall not exceed ten percent (10%) opacity. IDEM and USEPA have information that indicates that the Permittee is not in compliance with this opacity limit. The OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with this opacity limit and a schedule for achieving compliance with such requirement.
  - (5) When the Loesche raw mill (EU14) is operating and the kiln #2 is not operating, the visible emissions from the baghouse controlling the Loesche raw mill shall not exceed 10% opacity.
  - (6) When the kiln #2 is operating and Loesche raw mill (EU14) is not operating, the visible emissions from the baghouse controlling kiln #2 shall not exceed 20% opacity.
  - (7) Dioxin/Furan emissions shall be limited to  $8.7 \times 10^{-11}$  grains per dry standard cubic foot (TEQ) corrected to seven percent oxygen; or  $1.7 \times 10^{-10}$  grains per dry standard cubic foot (TEQ) corrected to seven percent oxygen, when the average of the performance test run average temperatures at the inlet to the particulate matter control device is 400 degrees Fahrenheit or less.
  - (8) The Kilns shall operate such that the three-hour rolling average PMCD inlet temperature is no greater than the temperature established at the performance test.
- (b) Pursuant to 40 CFR 63.1345 (Emissions Standards and Operating Limits), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, each clinker cooler shall be limited as follows:

- (1) Particulate matter (PM) emissions shall be limited to 0.10 pound per ton of feed (dry basis) to the kiln.
  - (2) Visible emissions shall be limited to ten percent (10%) opacity.
- (c) Pursuant to 40 CFR 63.1348 (Emissions Standards and Operating Limits), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, the visible emissions from the raw mill facilities, the kiln #1 feed system (EU19), the kiln #2 feed system (EU26), the coal (crusher) mill #1 (EU66), the coal (crusher) mill #2 (EU67), the fuel oil-fired air heater for kiln #1 coal mill (EU68), the fuel oil-fired air heater for kiln #2 coal mill (EU69), the kiln #2 coal dust silo (EU149), the kiln #2 coal weigh system (EU150), and the kiln #2 coal handling system (EU151) shall not exceed ten percent (10%) opacity.

#### D.3.6 Determinations of Nonapplicability [40 CFR 60, Subparts A and F]

The raw mill facilities (EU09 through EU15, EU17, and EU107 through EU109), the kiln #2 (EU27) and associated preheater unit, alkali bypass (EU28), and kiln #2 feed system (EU26), the clinker cooler #2 (EU29), and the coal handling, milling, and storage facilities (EU67, EU69, EU149, EU150, and EU151) are not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because the requirements of the NESHAP 40 CFR 63 Subpart LLL superseded the requirements of the NSPS on June 14, 2002. The kiln #1 system, the kiln #1 feed system (EU19), the clinker cooler #1 (EU22), the coal crusher mill #1 (EU66), and the fuel oil-fired air heater for kiln #1 (EU68) are not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because they were constructed prior to the applicability date of August 17, 1971.

#### D.3.7 NOx Emissions [326 IAC 10-1] [326 IAC 10-3]

- (a) Pursuant to 326 IAC 10-1-4, NOx emissions from the long dry rotary cement kiln #1 (EU20) shall not exceed 10.8 pounds per ton of clinker produced on an operating day basis and 6.0 pounds per ton of clinker produced on a thirty (30) day rolling average.
- (b) The following requirements apply to the dry preheater rotary cement kiln #2 (EU27):
  - (1) Pursuant to 326 IAC 10-1-4, NOx emissions shall not exceed 5.9 pounds per ton of clinker produced on an operating day basis and 4.4 pounds per ton clinker produced on a thirty (30) day rolling average basis.
  - (2) Pursuant to 326 IAC 10-3-3, after May 31, 2004 and during the ozone control period of each year, the Permittee shall comply with one (1) of the following:
    - (A) The kiln shall operate with Low-NOx burners; or
    - (B) NOx emissions shall not exceed 3.8 pounds per ton of clinker produced, averaged over the ozone control period.

#### D.3.8 NSPS for Coal Preparation Plants [326 IAC 12] [40 CFR 60, Subpart Y]

- (a) The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facilities listed in paragraph (b) below, and as described in this section except when otherwise specified in 40 CFR Part 60, Subpart Y.
- (b) Pursuant to 40 CFR 60, Subpart Y, the following conditions shall apply to the coal handling, milling, and storage facilities, including the coal (crusher) mill #2 (EU67), and the fuel oil-fired air heater for kiln #2 (EU69):
  - (1) The opacity from each of these facilities shall be less than 20 percent.

- (2) The particulate matter emissions from the coal (crusher) mill #2 (EU67) shall not exceed 0.031 grains per dry standard cubic foot of exhaust air (0.070 g/dscm).
- (3) The Permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the temperature of the gas stream at the exit of the coal (crusher) mill #2 (EU67) on a continuous basis. The monitoring device is to be certified by the manufacturer and be accurate within plus or minus 3 degrees Fahrenheit. The monitoring device shall be recalibrated annually in accordance with the procedures specified in 40 CFR 60.13(b).

D.3.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 10-3] [40 CFR 63, Subpart LLL]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for all of the control devices listed in this section, and for the kilns and clinker coolers.

**Compliance Determination Requirements**

D.3.10 Testing Requirements [40 CFR 63, Subpart LLL] [326 IAC 20-27-1][326 IAC 2-7-6(1)(6)] [326 IAC 2-1.1-11]

- (a) The Permittee shall test kiln #1 (EU20), kiln #2 (EU27) and associated preheater, kiln #2 alkali bypass (EU28), clinker cooler #1 (EU22), clinker cooler #2 (EU29), kiln feed system #1 (EU19), kiln feed system #2 (EU26), kiln #2 coal dust silo (EU149), kiln #2 coal weigh system (EU150), and kiln #2 coal handling system (EU151) for PM emissions in order to demonstrate compliance with Conditions D.3.1 and D.3.2, utilizing methods as approved by the Commissioner. These tests shall be conducted within 180 days after the issuance of this Part 70 permit, or within 2.5 years after the last valid compliance demonstration, whichever is later. The tests to demonstrate compliance with Condition D.3.1 shall be repeated at least every 2.5 years from the date of this valid compliance demonstration. These tests shall be conducted in accordance with Section C - Performance Testing. All associated facilities exhausting to a single stack must all be operating when determining compliance with the limit.
- (b) Within 180 days after the issuance of this Part 70 permit the Permittee shall conduct a Method 5 stack test to determine compliance with the particulate matter emission limit for the coal (crusher) mill #2 (EU67) in Condition D.3.8. The Permittee shall conduct Method 9 opacity tests to determine compliance with the opacity limits for the fuel oil-fired air heater for kiln #2 coal mill (EU69) in Condition D.3.8. These tests shall be conducted in accordance with Section C - Performance Testing.
- (c) No later than 180 days after June 14, 2002, which is the compliance date for the Portland Cement Manufacturing Industry NESHAP, the Permittee shall demonstrate initial compliance with the opacity limits established in Condition D.3.5(c) for the kiln #1 feed system (EU19), the kiln #2 feed system (EU26), the coal (crusher) mill #1 (EU66), the coal (crusher) mill #2 (EU67), the fuel oil-fired air heater for kiln #1 coal mill (EU68), the fuel oil-fired air heater for kiln #2 coal mill (EU69), the kiln #2 coal dust silo (EU149), the kiln #2 coal weigh system (EU150), and the kiln #2 coal handling system (EU151) by conducting performance tests in accordance with 40 CFR 63.1349, Method 9 of 40 CFR Part 60, Appendix A, and Section C- Performance Testing. These tests shall be conducted in accordance with Section C - Performance Testing.
- (d) No later than 180 days after June 14, 2002, which is the compliance date for the Portland Cement Manufacturing Industry NESHAP, the Permittee shall demonstrate initial compliance with the PM and opacity limits established in Condition D.3.5(b) for clinker cooler #1 and clinker cooler #2 by conducting performance tests in accordance with 40 CFR 63.1349, Methods 5 and 9 of 40 CFR Part 60, Appendix A, and Section C- Performance Testing. These tests shall be repeated at least once every 5 years from the date of this valid compliance demonstration. These tests shall be conducted in accordance with Section C - Performance Testing.

- (e) No later than 180 days after June 14, 2002, which is the compliance date for the Portland Cement Manufacturing Industry NESHAP, the Permittee shall demonstrate initial compliance with the PM, opacity and dioxin/furan limits established in Condition D.3.5(a) for kiln #1 and kiln #2 by conducting performance tests in accordance with 40 CFR 63.1349 and Methods 5, 9 and 23 of 40 CFR Part 60, Appendix A, respectively and Section C - Performance Testing. These tests shall be repeated at least once every 5 years from the date of this valid compliance demonstration. The Permittee is also required to repeat the performance tests for particulate matter and dioxins/furans within 90 days of initiating any significant change in the feed or fuel from that used in the previous test. These tests shall be conducted in accordance with Section C - Performance Testing.
- (f) During each stack test required above, the following items shall be performed:
  - (1) Certified continuous opacity monitoring (COM) data shall be observed and recorded or EPA Method 9 opacity tests shall be performed.
  - (2) The kiln temperature and oxygen concentration shall be measured and recorded.
  - (3) The clinker production rate shall be measured and recorded.
  - (4) Pursuant to 326 IAC 3-6-3(b)(2) and 40 CFR 63.7(e), the tests shall be conducted under representative operating conditions.
  - (5) Pursuant to 326 IAC 3-6-3(b), during the performance tests, each kiln and clinker cooler must be operating at 95 percent of its maximum production capacity or more, or under other capacities or conditions specified and approved by IDEM, to be considered a valid test.

#### D.3.11 Particulate Matter (PM) Control

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Except as otherwise provided by statute, rule, or this permit, in order to comply with Conditions D.3.1, D.3.2, D.3.5, and D.3.8, the following conditions shall apply:

- (a) The baghouse 209 for PM control shall be in operation at all times and control emissions from the kiln #1 feed system when the kiln #1 feed system is in operation.
- (b) The baghouse 221 for PM control shall be in operation at all times and control emissions from the kiln #1 when the kiln #1 is in operation.
- (c) The baghouse 231 for PM control shall be in operation at all times and control emissions from the kiln #2 feed system when the kiln #2 feed system is in operation.
- (d) Baghouse 15 and baghouse 16, for PM control, shall be in operation at all times and control emissions from the kiln #2 and raw mill when the kiln #2 or the raw mill is in operation.
- (e) The baghouse 232 for PM control shall be in operation at all times and control emissions from the kiln #2 alkali bypass when the kiln #2 alkali bypass is in operation.
- (f) The baghouse 222 for PM control shall be in operation at all times and control emissions from the clinker cooler #1 when the clinker cooler #1 is in operation.
- (g) The baghouse 17 for PM control shall be in operation at all times and control emissions from the clinker cooler #2 when the clinker cooler #2 is in operation.
- (h) Each baghouse or filter controlling any of the coal handling, milling, and storage facilities shall be in operation at all times when the associated facility is in operation.

- (i) In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

D.3.12 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Pursuant to 326 IAC 7-2, the Permittee shall demonstrate that the sulfur dioxide emissions from coal combustion or simultaneous combustion of coal and oil, do not exceed six (6.0) pounds per MMBtu. Pursuant to 326 IAC 7-2, compliance with the limit in Condition D.3.3 shall be determined utilizing one of the following methods:

- (a) Coal sampling and analysis shall be performed using one of the following procedures:
  - (1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)(3)]:
    - (A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system;
    - (B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period;
    - (C) Minimum sample size shall be five hundred (500) grams;
    - (D) Samples shall be composited and analyzed at the end of each calendar month;
    - (E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e); or
  - (2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a). Preparation of the coal sample heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d), and (e);
  - (3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the kilns, in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, and 8. [326 IAC 7-2-1(d)]
- (c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.13 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 2-7-5(A)] [326 IAC 2-7-6]

Compliance with the limit in Condition D.3.3(b) and (c) shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions do not exceed five-tenths (0.5) pounds per million Btu heat input by:

- (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
- (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
  - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
  - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from each of the kilns and heaters, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to any of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.3.14 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart LLL] [326 IAC 10-1] [326 IAC 10-3]

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- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11 and 40 CFR Part 63.1350 a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring the opacity from each of the kilns, pursuant to 326 IAC 3-5. The continuous monitoring system shall be installed and operational prior to conducting the performance tests required in Condition D.3.10.
- (b) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2-1.1-11, 40 CFR Part 63, a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring opacity from both of the clinker coolers.
- (c) The continuous monitoring systems shall meet the performance specifications of 326 IAC 3-5-2, and shall demonstrate continuous compliance with Section C - Opacity, and Conditions D.3.5(a)(3) and (b)(2) and D.3.8(b).
- (d) The continuous opacity monitoring systems shall meet the performance specifications of 326 IAC 3-5-2 and 40 CFR 63.8(c).
- (e) Pursuant to 326 IAC 10-1 and 326 IAC 10-3, compliance with the NO<sub>x</sub> limits for the kilns in Condition D.3.7, 326 IAC 10-1, and 326 IAC 10-3 shall be demonstrated by installing and operating a NO<sub>x</sub> continuous emissions monitor (CEM) for each stack exhausting kiln emissions. The NO<sub>x</sub> CEMs shall be certified according to procedures contained in 326 IAC 3 and 40 CFR 75 as applicable. IDEM has information that indicates that kiln #1 (EU20) is not in compliance with the requirement to certify the NO<sub>x</sub> CEM as required by this condition. The OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with this rule and a schedule for achieving compliance with such requirements.
- (f) In order for kiln #2 to come into compliance with the requirements of 326 IAC 10-1, the Permittee shall install, calibrate, maintain, and operate a NO<sub>x</sub> continuous emissions monitor (CEM) on the stack identified as EP23 for the elevator/dust tank (alkali bypass) identified as EU28 on kiln #2, within 12 months after the date of issuance of this permit. The NO<sub>x</sub> CEMs shall be certified according to procedures contained in 326 IAC 3 and 40 CFR 75 as applicable.
- (g) In the event that a nitrogen oxide CEMS fails, the Permittee shall monitor the oxygen content and temperature of the kiln exhaust at least once per hour. If the oxygen content or temperature is outside the range established in the latest compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C –

Response to Excursions and Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

D.3.15 NESHAP Monitoring Requirements [40 CFR 63, Subpart LLL][326 IAC 20-27-1]

- (a) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, the Permittee shall perform the following monitoring requirements:
- (1) The Permittee shall have prepared written operations and maintenance plans for kiln #1, kiln #2, clinker cooler #1, and clinker cooler #2. The plans shall include the following information:
    - (A) Procedures for proper operation and maintenance of kiln #1, kiln #2, clinker cooler #1, clinker cooler #2, and all associated air pollution control device(s) in order to meet the emissions limits in Condition D.3.5; and
    - (B) Procedures to be used during an inspection of the components of the combustion system of kiln #1 and kiln #2 at least once per year.

Failure to comply with any provision of the operations and maintenance plan shall be a violation of the standard.
  - (2) The Permittee shall conduct an inspection of the components of the combustion system of kiln #1 and kiln #2 at least once per year.
  - (3) The Permittee shall continuously monitor opacity of emissions at the outlet of the PM control device for the kiln #1, kiln #2, clinker cooler #1, and clinker cooler #2. The COMs required by Condition D.3.14 shall be used to monitor opacity emissions in accordance with the NESHAP and shall be installed, maintained, calibrated and operated as required by 40 CFR 63, Subpart A and according to 40 CFR 60, Appendix B, PS-1.
  - (4) The Permittee shall install, calibrate, maintain, and continuously operate a continuous monitor to record the temperature of the exhaust gases from kiln #1 and kiln #2 at the inlet to, or upstream of the kiln's PM control device.
    - (A) The recorder response range must include zero and 1.5 times either of the average temperatures established according to the requirements in 40 CFR 63.1349(b)(3)(iv).
    - (B) The reference method must be a National Institute of Standards and Technology calibrated reference thermocouple-potentiometer system or alternate reference, subject to approval by the Administrator.
    - (C) The three-hour rolling average temperature shall be calculated as the average of 180 successive one-minute average temperatures.
    - (D) Periods of time when one-minute averages are not available shall be ignored when calculating three-hour rolling averages. When one-minute averages become available, the first one-minute average is added to the previous 179 values to calculate the three-hour rolling average.
    - (E) The calibration of all thermocouples and other temperature sensors shall be verified at least once every three months.
- (b) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall prepare a written operations and maintenance plan for the kiln #1 feed system (EU19), the kiln #2 feed system (EU26), the coal (crusher) mill #1 (EU66), the coal (crusher) mill #2 (EU67),

the fuel oil-fired air heater for kiln #1 coal mill (EU68), the fuel oil-fired air heater for kiln #2 coal mill (EU69), the kiln #2 coal dust silo (EU149), the kiln #2 coal weigh system (EU150), and the kiln #2 coal handling system (EU151) by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. The plan shall include the following information:

- (1) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emissions limit in Condition D.3.5; and
- (2) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348. Such procedures must include the following provisions:
  - (A) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source, in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
  - (B) If no visible emissions are observed in six consecutive monthly tests for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
  - (C) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
  - (D) If visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40 CFR 60, Appendix A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.
- (3) Corrective actions to be taken when required by paragraph (b).

Failure to comply with any provision of the operations and maintenance plan shall be a violation of the standard.

- (c) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall monitor opacity from the raw mills by conducting daily visual emissions observations of the mill sweep and air separator particulate matter control devices (PMCDs), in accordance with the procedures of 40 CFR 60, Appendix A, Method 22. The Method 22 test shall be conducted while the affected source is operating at the representative performance conditions. The duration of the Method 22 test shall be six minutes. If visible emissions are observed during any Method 22 visible emissions test, the Permittee must initiate, within one (1) hour, the corrective actions specified in the site specific operations and maintenance plan developed in accordance with 40 CFR 63.1350(a)(1) and (a)(2); and conduct a follow-up Method 22 test. If visible emissions are observed, then within 24 hours of the end of the Method 22 test in which the visible emissions were observed, the Permittee must conduct a followup Method 22 test of each stack from which visible emissions were observed during the previous Method 22 test. If visible emissions are observed during the followup Method 22 test, the Permittee must conduct a visual opacity

test of each stack from which visible emissions were observed during the followup Method 22 test, in accordance with 40 CFR 60, Appendix A, Method 9. The duration of the Method 9 test shall be thirty (30) minutes.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.3.16 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

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- (a) The ability of the ESP to control particulate emissions shall be monitored once per day, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) Reasonable response steps shall be taken in accordance with Section C – Response to Excursions and Exceedances whenever the percentage of T-R sets in service falls below 90 percent (90%). T-R set failure resulting in less than 90 percent (90%) availability is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

#### **D.3.17 Opacity Readings**

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The ability of each ESP and baghouse to control particulate emissions from the kilns and clinker coolers shall be monitored by continuously measuring and recording the opacity of emissions from the stack exhausts. The opacity shall be determined by the certified continuous opacity monitor required in Condition D.3.14.

- (a) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:
  - (1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the emission unit at the time of the reading.
    - (A) 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.
    - (B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations within four hours of the second abnormal notation.
    - (C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.
  - (2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the emission unit stack.
    - (A) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
    - (B) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least once every four (4) hours during daylight operations, until such time that a COM is in operation.

- (C) Method 9 readings may be discontinued once a COM is online.
  - (D) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.
- (b) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5 and 40 CFR 63, Subpart LLL.

#### D.3.18 Method 9 Opacity Readings and Visible Emissions Notations

The emission units and associated baghouses for which continuous opacity monitors are not used shall comply with the following requirements:

- (a) Visible emission notations of the baghouse stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. 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) If abnormal emissions are present at any baghouse stack for which a COM is not required, the Permittee shall implement the appropriate procedures as set out in Section C – Response to Excursions and Exceedances for such facility. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

#### D.3.19 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across each baghouse, at least once per day when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances. A pressure reading that is outside the normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

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

#### D.3.20 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately

until the failed unit has 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).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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 and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.3.21 Record Keeping Requirements**

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- (a) To document compliance with Condition D.3.3, D.3.12 and D.3.13, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken on a calendar month average and shall be complete and sufficient to establish compliance with the SO<sub>2</sub> emission limits established in Condition D.3.3.
  - (1) Calendar dates covered in the compliance determination period;
  - (2) Actual coal and oil usages since last compliance determination period;
  - (3) Sulfur content and heat content of both coal and oil used;
  - (4) Sulfur dioxide emission rates.
- (b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.
- (c) To document compliance with Conditions D.3.14 through D.3.19, the Permittee shall maintain records of (1) through (7) below. Records shall be complete and sufficient to establish compliance with the limits established in this section.
  - (1) Data and results from the most recent stack tests.
  - (2) All continuous emissions monitoring data.
  - (3) The results of all baghouse inspections and the type and number of parts replaced.
  - (4) Visible emission notations required by Conditions D.3.17 and D.3.18.
  - (5) Method 9 opacity readings for the kilns and clinker coolers whenever required by this permit.
  - (6) Pressure drop readings required by Condition D.3.19.
  - (7) All response steps taken and the outcome for each.
- (d) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
  - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).

- (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
  - (I) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
  - (II) All records of applicability determination, including supporting analyses.
- (3) The Permittee shall maintain all records of continuous monitoring system data required by 40 CFR 63.10(c).
- (e) In order to document compliance with Condition D.3.5(a)(4), (5), and (6), the Permittee shall keep records of all times when the raw mill is in operation and all times when the kiln #2 is in operation.
- (f) To document compliance with 40 CFR 60.250, NSPS, Subpart Y, the Permittee shall maintain records of the monitoring device measurements of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. Records shall be complete and sufficient to establish compliance with the requirements of Subpart Y.
- (g) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.3.22 Reporting Requirements

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- (a) A quarterly summary of the information to document compliance with the SO<sub>2</sub> limits specified in Condition D.3.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. These reports submitted by the Permittee do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 326 IAC 10-1 and 326 IAC 10-3, CEM performance evaluation reports shall be submitted each calendar quarter.
- (c) Pursuant to 326 IAC 10-1, the source shall notify the OAQ at least thirty (30) days prior to the addition or modification of a facility that may result in a potential increase in NOx emissions.
- (d) Pursuant to 326 IAC 10-1, the source may comply with the reporting requirements of 326 IAC 10-1 by submitting to the OAQ a substitute report. A substitute report is a report that satisfies an applicable state or federal reporting requirement and contains the information required to be submitted by this rule.
- (e) A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7, from the continuous monitoring system, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. The excess opacity summary shall also be submitted in accordance with 40 CFR 63.1354(8) (beginning June 14, 2002).
- (f) Beginning June 14, 2002, the Permittee shall submit a continuous monitoring system (CMS) performance report with the excess opacity summaries, in accordance with 40 CFR 63.1354(8) and 40 CFR 63, Subpart A.
- (g) Beginning June 14, 2002, the Permittee shall submit a semi-annual summary report which contains the information specified in 40 CFR 63.10(e)(3)(vi), as well as the following:
  - (1) All exceedances of maximum control device inlet gas temperature limits specified in Condition D.3.5.

- (2) All failures to calibrate thermocouples and other temperature sensors as required under 40 CFR 63.1350(f)(7).
- (3) The results of any combustion system component inspections conducted within the reporting period as required by Condition D.3.15.
- (4) All failures to comply with any provision of the operation and maintenance plan developed in accordance with 40 CFR 63.1350(a).

If the total continuous monitoring system (CMS) downtime for any CEM or any CMS for the reporting period is ten percent or greater of the total operating time for the reporting period, the Permittee shall submit an excess emissions and CMS performance report along with the summary report.

- (h) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
  - (1) The plan required by Condition D.3.15 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry.
  - (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
  - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
  - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
  - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, and the source exceeds any applicable emission limitation in the relevant emission standard, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317) 233-0178 or facsimile (FAX) transmission at (317) 233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (i) In addition to being submitted to the address listed in Section C - General Reporting Requirements, all reports submitted pursuant to 40 CFR 63, Subpart A shall also be submitted to the U.S. EPA at the following address:

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

Pursuant to 40 CFR 63.10(d)(5)(i) and (ii), the reports submitted by the Permittee shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Insignificant Activity

#### Degreasing operations

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(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 2-7-5(1)]

#### D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.4.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for a cold cleaner degreaser facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

#### D.4.3 Material Requirements for Cold Cleaning Degreasers [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Organic Solvent Degreasing Operations: material requirements for cold cleaning degreasers), the following conditions shall apply:

- (a) The source shall not operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) The source shall maintain the following records for each purchase:
  - (1) the name and address of the solvent supplier;
  - (2) the date of purchase;
  - (3) the type of solvent;
  - (4) the volume of each unit of solvent;
  - (5) the total volume of the solvent; and
  - (6) the true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

#### D.4.4 Determinations of Nonapplicability [40 CFR 63.460 (Subpart T)] [40 CFR 60, Subparts A and F] [40 CFR 63, Subparts A and LLL]

- (a) None of the parts washers specifically listed in this section are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 20-1, 40 CFR 63.460 (Subpart T) because they do not utilize a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these halogens, in a total concentration greater than five percent by weight.

- (b) The parts washers at this source are not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because they are not considered affected facilities under this rule.
  
- (c) The parts washers at this source are not subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63 Subparts A and LLL, because they are not considered affected facilities under this rule.

**SECTION D.5**

**FACILITY OPERATION CONDITIONS**

<b>Facility Description [326 IAC 2-7-5(15)]</b>	<b>Insignificant Activities</b>
(a) Underground conveyors; [326 IAC 6-1-2]	
(b) Coal bunker and coal scale exhausts and associated dust collector vents; [326 IAC 6-1-2]	
(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 2-7-5(1)]**

**D.5.1 Particulate Matter (PM) [326 IAC 6.5-1-2]**

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Pursuant to 326 IAC 6.5-1-2, the allowable PM emissions from each of the underground conveyors, the coal bunker, and coal scale shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

## SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION REQUIREMENTS

### Facility Description [326 IAC 2-7-5(15)]

The entire plant site is subject to the Plant wide Applicability Limitation [PAL] requirements described in this E section.

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

### Source Wide Emission Limits [326 IAC 2-2.4-7(1)] [326 IAC 2-3.4-7(1)]

#### E.1.1 Emission Limits [326 IAC 2-2.4-7(1)][326 IAC 2-3.4-7(1)]

Oxides of Nitrogen (NO<sub>x</sub>) emissions from the entire source shall not exceed 2,566 tons per rolling twelve (12) month period with compliance determined at the end of each month. This provision does not supersede any other NO<sub>x</sub> emission limits contained in this permit.

### General PAL Requirements [326 IAC 2-2.4-1] [326 IAC 2-3.4-1]

#### E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)] [326 IAC 2-3.4-1(c)]

Any physical change or change in the method of operation of this source is not a major modification for NO<sub>x</sub>, and not subject to the review requirements of 326 IAC 2-2 and 326 IAC 2-3, provided the actual emissions of NO<sub>x</sub> from the entire source do not exceed the emission limit in Condition E.1.1 of this permit.

#### E.1.3 General PAL requirements [326 IAC 2-2.4-7 through 326 IAC 2-2.4-11][326 IAC 2-2.4-15][326 IAC 2-3.4-7 through 326 IAC 2-3.4-11][326 IAC 2-3.4-15]

- (a) The requirements of this E Section become effective on July 1, 2008 and expire ten years after that date.
- (b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3, 326 IAC 2-2.4-10, 326 IAC 2-3.4-3 and 326 IAC 2-3.4-10.
- (c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 and 326 IAC 2-3.4-9 are applicable.
- (d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10 and 326 IAC 2-3.4-10.
- (e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11 and 326 IAC 2-3.4-11.
- (f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15 and 326 IAC 2-3.4-15.

### Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) & (7)] [326 IAC 2-3.4-12]

#### E.1.4 NO<sub>x</sub> Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) and (7)] [326 IAC 2-3.4-12]

The Permittee shall install, calibrate, maintain and operate a NO<sub>x</sub> continuous emission monitoring system (CEMS) on stacks S-14, S-15 and S-16. The CEMS shall be designed to determine actual emissions of NO<sub>x</sub> as described below:

- (a) The Permittee shall comply with the requirements of Conditions D.3.14(e) – (g).

- (b) Pursuant to 326 IAC 2-2.4-12(d) and 326 IAC 2-3.4-12(d), an owner or operator using CEMS to monitor PAL pollutant emissions shall meet the following requirements:
- (1) CEMS must comply with applicable performance specifications found in 40 CFR Part 60, Appendix B; and
  - (2) CEMS must sample, analyze, and record data at least every fifteen (15) minutes while the emissions unit is operating.

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

#### E.1.5 Record keeping requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13] [326 IAC 2-3.4-13]

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section, including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to, recorded data generated by the CEMS required by Condition E.1.4.
- (b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.

#### E.1.6 Reporting requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14] [326 IAC 2-3.4-14]

- (a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the semi-annual calendar period being reported. This report requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). The report shall include the following information:
- (1) The identification of the owner and operator of the source and the permit number.
  - (2) Total emissions of NO<sub>x</sub>, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.
  - (3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.
  - (4) A list of any emissions units modified or added to the major stationary source during the reporting period.
  - (5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.
- (b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Condition B.15 (Deviation from Permit Requirements and Conditions). A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

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

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008

**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:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- 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:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-0178  
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008

**This form consists of 2 pages**

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<p>☛ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and</li><li>C The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
--

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 <sub>2</sub> , VOC, NO <sub>x</sub> , 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

### Part 70 Quarterly Report for Use When Combusting Only Coal

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008  
Facility: Kilns #1 and 2  
Parameter: Sulfur Dioxide (SO<sub>2</sub>)  
Limit: 6.0 pounds per million Btu heat input

FACILITY: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Monthly Average Coal Sulfur Content  (%)	Monthly Average Coal Heat Content  (MMBtu/lb)	Coal Consumption  (Tons)	Equivalent Sulfur Dioxide Emissions  (lbs/MMBtu)

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report for Use When Combusting Only Fuel Oil

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008  
Facility: Kilns #1 and 2  
Parameter: Sulfur Dioxide (SO<sub>2</sub>) from fuel oil combustion  
Limit: 0.5 pounds per million Btu heat input

FACILITY: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Monthly Average Fuel Oil Sulfur Content  (%)	Monthly Average Fuel Oil Heat Content  (MMBtu/lb)	Fuel Oil Consumption  (Gallons)	Equivalent Sulfur Dioxide Emissions  (lbs/MMBtu)

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

### Part 70 Quarterly Report for Use When Combusting Coal and Fuel Oil Simultaneously

Source Name: ESSROC Cement Corporation  
 Source Address: Highway 31, Speed, Indiana 47172  
 Mailing Address: Highway 31, Speed, Indiana 47172  
 Part 70 Permit No.: T019-6016-00008  
 Facility: Kilns #1 and 2  
 Parameter: Sulfur Dioxide (SO<sub>2</sub>) from the simultaneous combustion of coal and oil  
 Limit: 6.0 pounds per million Btu heat input

Compliance with the SO<sub>2</sub> limit shall be determined using the following equation:

$$\text{SO}_2 \text{ emissions (lbs/MMBtu)} = (\text{Fuel oil usage} \times \text{EF coefficient} \times \text{fuel oil sulfur content} + \text{coal usage} \times \text{EF coefficient} \times \text{coal sulfur content}) / (\text{fuel oil usage} \times \text{HHV oil} + \text{coal usage} \times \text{HHV coal}).$$

FACILITY: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Monthly Average Sulfur Content (%)		Monthly Average Heat Content (MMBtu/lb)		Month Fuel Consumption		Equivalent Sulfur Dioxide Emissions (lbs/MMBtu)
	Coal	Fuel Oil	Coal	Fuel Oil	Coal (tons)	Fuel Oil (gallons)	This Month
1							
2							
3							

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.  
 Deviation has been reported on:

Submitted by: \_\_\_\_\_  
 Title / Position: \_\_\_\_\_  
 Signature: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008  
Facility: fuel oil-fired furnaces (EU13, EU68, and EU69)  
Parameter: Sulfur Dioxide (SO<sub>2</sub>)  
Limit: 0.5 pounds per million Btu heat input

FACILITY: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	Monthly Average Fuel Oil Sulfur Content (%)	Monthly Average Fuel Oil Heat Content (MMBtu/lb)	Fuel Oil Consumption (Gallons)	Equivalent Sulfur Dioxide Emissions (lbs/MMBtu)

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

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

## Part 70 Quarterly Report

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008  
Facility: quarry drilling  
Parameter: number of holes drilled  
Limit: 38,000 per 12 consecutive month period

YEAR:

Facility	Month	Column 1	Column 2	Column 1 + Column 2
		This Month	Previous 11 Months	12 Month Total
quarry drilling	Month 1			
	Month 2			
	Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.  
Deviation has been reported on:

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is required for this report.

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

## PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: ESSROC Cement Corporation  
Source Address: Highway 31, Speed, Indiana 47172  
Mailing Address: Highway 31, Speed, Indiana 47172  
Part 70 Permit No.: T019-6016-00008

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

<p>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".</p>	
<p><input type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	
<p><b>Permit Requirement</b> (specify permit condition #)</p>	
<p><b>Date of Deviation:</b></p>	<p><b>Duration of Deviation:</b></p>
<p><b>Number of Deviations:</b></p>	
<p><b>Probable Cause of Deviation:</b></p>	
<p><b>Response Steps Taken:</b></p>	

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the Technical Support Document  
for a Plantwide Applicability Limitation (PAL) Permit  
and a  
Part 70 Significant Permit Modification**

**Source Background and Description**

Source Name:	ESSROC Cement Corporation
Source Location:	301 Highway 31, Speed IN 47172-1305
County:	Clark
SIC Code:	3241
Operation Permit No.:	T019-6016-00008
Operation Permit Issuance Date:	June 15, 2004
Significant Permit Modification No.:	019-21450-00008
Permit Reviewer:	ERG/BS

On November 1, 2006, the Office of Air Quality (OAQ) had a notice published in the Evening News of Jeffersonville, Indiana, stating that ESSROC Cement Corporation ("ESSROC") applied for a Significant Permit Modification for a Plantwide Applicability Limit (PAL) for SO<sub>2</sub> and NO<sub>x</sub> relating to the operation of a stationary portland cement plant. The notice also stated that OAQ proposed to issue a permit for the requested changes and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 17, 2006, a member of the public, Bob Adkins, submitted comments on the proposed document. The following is a summary of the comments and responses to all comments. Added text is shown as **bold** and deleted text is shown as ~~strikeout~~. When conditions are added or deleted, the other conditions are renumbered accordingly, and the Table of Contents modified to reflect these changes.

**Comment 1:**

All you have to do is look at the operation as an outsider from this community to see how IDEM allows ESSROC to pollute the Sellersburg/Speed, Indiana environment. ESSROC is producing a tremendous quantity of air-born pollutants, which covers a radius of 10-15 miles from the plant, depending on wind conditions.

I would request that this operation be closed until the entire area has been thoroughly cleaned. Their terrible polluting ways should be stopped immediately, and IDEM should make sure that ESSROC does not continue polluting in the future.

One only has to drive by the plant to see just how terrible the emissions are around the plant as well as to all the homes in the general area. IDEM has done a terrible disservice to this community by allowing ESSROC to pollute the way they have in the past and are polluting at the present. It is the local citizens, who by the way pay the taxes that fund IDEM, that are being harmed. I do not understand how IDEM can be so lax in allowing this pollution to continue.

I sincerely hope IDEM does not issue this permit if it means ESSROC will be able to add more pollutants into our community.

### Response to Comment 1:

As stated in the Technical Support Document (TSD) and Section A.1 of the permit, ESSROC is a major source of air emissions. The Clean Air Act requires all major sources to obtain a Part 70 permit and Part 70 permit requirements in Indiana are governed by 326 IAC 2-7. Pursuant to 326 IAC 2-7, ESSROC is allowed to operate as long as it is able to comply with the requirements of their Part 70 permit (T019-6016-00008), issued on June 14, 2004. With exception to the items identified in the *Enforcement Issues* section of the TSD, the IDEM, OAQ believes ESSROC to be in compliance with all applicable 326 IAC and 40 CFR requirements. IDEM's Office of Enforcement is currently working to resolve all outstanding enforcement issues in order to bring ESSROC into full compliance with the respective requirements.

This Significant Permit Modification revises ESSROC's Part 70 permit to include a Plantwide Applicability Limit (PAL) for NO<sub>x</sub>. The necessary and appropriate PAL provisions, pursuant to 326 IAC 2-2.4 and 326 IAC 2-3.4, are included in Section E.1 of the permit.

No changes were made to the permit as a result of this comment.

### Comment 2:

Living in this community creates so many health hazards for the citizens. Has anyone conducted a study to compare our respiratory/cancer incidences per thousand residents to the rest of the country?

### Response to Comment 2:

The federal Clean Air Act requires the United States Environmental Protection Agency (U.S. EPA) to set National Ambient Air Quality Standards (NAAQS) for six criteria pollutants. These criteria pollutants are carbon monoxide (CO), lead, sulfur dioxide (SO<sub>2</sub>), particulate matter to a diameter of 2.5 microns (PM<sub>2.5</sub>), nitrogen oxides (NO<sub>x</sub>) and ground level ozone. More information about each of these pollutants is available at <http://www.epa.gov/air/airpollutants.html> on U.S. EPA's website. The U.S. EPA sets these standards at levels that protect human health, which is why the NAAQS are often referred to as the federal health standards for outdoor air. The NAAQS limit for all criteria pollutants is set low enough to protect the health of even the most sensitive persons, such as children, the elderly and people with preexisting health conditions, such as asthma, bronchitis and cardiovascular disease. Each NAAQS also has a secondary standard set to protect crops, livestock and buildings. The secondary standard is set to protect property from damage by air pollutants. The complete table of the NAAQS for all six criteria pollutants can be found at the <http://www.epa.gov/air/criteria.html> website. EPA's website <http://www.epa.gov/air/urbanair/6poll.html> provides more detailed information about the health effects of these six common air pollutants and why they are regulated.

The federal Clean Air Act requires the U.S. EPA to determine whether the ambient air in any area of the United States fails to meet any of the National Ambient Air Quality Standards (NAAQS). Any area that fails to meet one or more of the NAAQS will be designated as in "nonattainment" for that pollutant. Large air pollution sources in a nonattainment area are subject to additional regulations and U.S. EPA may require that additional steps be taken that will result in the area meeting the NAAQS. The U.S. EPA works with Indiana, Illinois and Kentucky in monitoring air pollution levels and in determining when air pollution modeling is needed.

Clark County is designated as being in attainment with the NO<sub>2</sub> NAAQS.

Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the NAAQS for ozone. Therefore, NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County, along with other counties in Indiana, was designated as being in nonattainment

of the 8-hour ozone standard in 2004. In March 2007, IDEM petitioned the U.S. EPA to redesignate Clark County as attainment for the 8-hour ozone standard. This petition was based on three consecutive years of monitoring data that showed compliance with the standard. On October 11, 2007, U.S. EPA approved IDEM's petition and is redesignating all of central Indiana, including Clark County, to attainment for the 8-hour ozone standard.

Upon issuance, this permit will establish a Plantwide Applicability Limit (PAL) for oxides of nitrogen (NOx). The necessary and appropriate PAL provisions, pursuant to 326 IAC 2-2.4 and 326 IAC 2-3.4, are included in Section E.1 of the permit.

IDEM conducts sampling of the ambient air at monitoring stations around Indiana. These air monitors measure whether the NAAQS are being met. Information about Indiana's air monitoring system and monitoring results is available at <http://www.in.gov/idem/programs/air/amb/index.html>. Information about current and expected air pollution levels is on IDEM's SmogWatch site at <http://www.in.gov/apps/idem/smog/> on the internet.

The IDEM, OAQ is not aware of an ongoing or completed study that investigates the respiratory illnesses or cancer rates of the population near ESSROC.

No changes were made to the permit as a result of this comment.

On November 29, 2006, Ethan Chatfield of the U.S. EPA submitted comments on the proposed document. Those comments were followed up with additional EPA comments from Pam Blakely on March 26, 2007. The following is a summary of the comments and responses to all comments. Added text is shown as bold and deleted text is shown as strikethrough. When conditions are added or deleted, the other conditions are renumbered accordingly, and the Table of Contents modified to reflect these changes.

### **Comment 3:**

On November 29<sup>th</sup>, 2006 we completed a review of and submitted comments on a draft Plant-wide Applicability Limitation (PAL) permit for ESSROC Cement Corporation in Speed, Indiana (permit # 21450). After further discussions with IDEM staff and ESSROC, we would like to clarify our concerns originally provided to you in November.

As you are aware, the proposed permit would establish plant-wide emission limitations for nitrogen oxides (NOx) and sulfur dioxide (SO<sub>2</sub>), with a baseline period starting August 1, 1995, and ending July 31, 1997. The facility listed two "major" emission units (or stacks), as defined by 40 CFR 52.21(aa)(2)(iv), that would be covered by the PAL: Kiln #1 and Kiln #2. Based on our discussions and further review, we have two concerns that should be addressed prior to issuance of the final permit.

First, we are concerned that the proposed PAL limit for NOx for Kiln #2 does not consider all federally enforceable limitations. The definition of baseline actual emissions states that the PAL "shall be adjusted downward to exclude any emissions that would have exceeded an emission limitation with which the major stationary source must currently comply...." (40 CFR 52.21(b)(48)(ii)(c) and 326 IAC 2-2-1(e)(2)(C)). The Technical Support Document (TSD) for the new source review (NSR) Reform rules clarifies that sources must adjust their baseline actual emission rates to account for all legally enforceable operational restrictions that have been imposed on the sources since the baseline period (see page I-3-8 and 9 of the November 22, 2002 TSD for the Prevention of Significant Deterioration and Non-attainment Area New Source Review Regulations). IDEM established the proposed PAL limit utilizing the allowable emission limitation of 4.4 pounds per ton of clinker, required by 326 IAC 10-1-4(b)(1) of Indiana's State Implementation Plan (SIP). However, it appears that IDEM did not adjust the baseline actual

emissions rate downward to account for additional emission reductions required since the proposed baseline period.

The permitting record shows that two applicable requirements have taken effect since the chosen 1995-1997 baseline period. The first is a requirement to comply with the 4.4 pounds per ton of clinker emission limit contained in 326 IAC 10-1-4. ESSROC complied with this requirement by installing an indirect firing system and a low-NOx burner in 1997. The second applicable requirement is the Nitrogen Oxide Reduction Program contained in 326 IAC 10-3-3 of the SIP. Having a choice of three options to demonstrate compliance with this program, ESSROC chose to comply by operating a low-NOx burner (see Condition D.3.7(a) of ESSROC's June 15, 2004 Part 70 Operating Permit). Since the operation of a low-NOx burner is required by a federally enforceable permit limitation, Indiana Department of Environmental Management (IDEM) must consider any emission reduction that result from the operation of the low-NOx burner in establishing the PAL baseline actual emission rate for NOx.

We therefore do not agree that ESSROC can set its PAL baseline actual emissions rate based on the 4.4 pounds per ton SIP allowable emission limitation. The PAL limit must be adjusted to recognize the operation of the low-NOx burners.

### **Response to Comment 3:**

As IDEM explained in Appendix A to the TSD, the 1995-1997 baseline was adjusted downward to take into account emission reductions required by two rules that became effective after the baseline period.

The first rule is 326 IAC 10-1, which limits NOx emissions from Kiln #2 to 462 pounds per hour based on a limit of 4.4 lbs per ton of clinker. Because the actual NOx emissions over the baseline period from Kiln #2 were greater than the 326 IAC 10-1 allowable emission rate, IDEM used the allowable emission rate as the foundation for the baseline actual emissions.

The second rule, also referred to as the "NOx SIP Call Rule", is 326 IAC 10-3. The EPA commented that, because ESSROC has relied on its low-NOx burners (LNB) to comply with the rule, the effect of the LNB must be taken into account when adjusting the baseline downward. However, the NOx SIP Call Rule actually offers three compliance options for Portland cement kilns and ESSROC has the option of choosing its method of compliance from time to time.

ESSROC and IDEM accounted for the NOx SIP Call Rule by assuming that the regulatory target of a 30% reduction in emissions would result from LNB. As shown in Appendix A, this reduction was applied during the ozone season to adjust the baseline actual emissions.

In response to EPA's concerns, ESSROC and IDEM have reconsidered this approach and agree that a lower NOx PAL would result by assuming compliance with the NOx SIP Call Rule using a different compliance option, as explained below:

For a preheater kiln like Kiln #2, the relevant compliance options listed in 326 IAC 10-3-3(a) are:

- (1) Operation of the kiln with one of the following:
  - (A) Low-NOx Burners.
  - (B) Mid-kiln Firing.
- (2) A limit on the amount of NOx emitted when averaged over the ozone control period as follows:  
...

(C) For preheater kilns, three and eight-tenths (3.8) pounds of NO<sub>x</sub> per ton of clinker produced.

...

- (3) Installation and use of alternative control techniques that may include kiln system modifications, such as conversions to semi-dry precalciner kiln processing, subject to department and U.S. EPA approval, that achieve a thirty percent (30%) emissions decrease from baseline ozone control period emissions. Baseline emissions shall be the average of the sum of ozone control period emissions for the two (2) highest emitting years from 1995 through 2000 determined in accordance with subsection (d)(1).

The EPA's comment assumes compliance will be met with only LNB pursuant to 326 IAC 10-3-3(a)(1). However, the source may instead elect to comply under option (a)(2) or (a)(3). Nothing in the rule specifies that a source is required to demonstrate compliance under the same option each year. The operating history of a given kiln would necessarily determine which of these options would result in the least restrictive limitation. In a given year, based on considerations of time and expense and subject to appropriate Part 70 permit terms, a source might choose to meet the rule requirement under an option that could result in greater overall reductions. According to the rule, the source may always choose among the specified options.

Therefore, the rule should be read to require the minimum reduction that can be calculated from the various compliance options available in a given year. If a source has chosen, as ESSROC has to date, to rely on what might be a more restrictive method, the source should not be penalized for this choice through the PAL program.

Assuming a LNB would achieve the 30% reduction described under option (3) above, the source would be able to comply with 326 IAC 10-3-3 using that option. 326 IAC 10-3-3(d)(1) states that, under option (3), the baseline ozone control period emissions must be determined according to one of four methods, including:

- (1) The average of the emission factors for the type of kiln from the Compilation of Air Pollutant Emission Factors (AP-42), Fifth Edition, January 1995, Supplements A through G, December 2000 and the NO<sub>x</sub> Control Technologies for the Cement Industry, Final Report, September 19, 2000.

For a preheater kiln, the AP-42 emission factor is 4.8 lb/ton (Table 11.6-8).

The NO<sub>x</sub> Control Technologies for the Cement Industry Final Report emission factor is 5.9 lb/ton (Table 4-5).

The actual emissions during ozone control period can be calculated using the average of the emissions factors with a 30% reduction from this level  $[(4.8 + 5.9)/2 \times 70\% = 3.7 \text{ lb/ton}]$ . The resulting hourly NO<sub>x</sub> rate of 388 lb/hr (using the same 105 tons per hour production rate as the proposed PAL permit) is then applied to actual hours during the ozone control period to adjust the baseline emissions downward.

Therefore, by applying option (3), the baseline actual emissions are 462 lb/hr under 326 IAC 10-1 during the non-ozone control period months and 388 lb/hr under 326 IAC 10-3 during the ozone control period of the baseline years as follows:

Year	Month	Actual Operating Hours	Most Restrictive Rule Emission Rate (lb/hr)	Adjusted Baseline Actual Emissions (tons)
1995	August	559	388	108.4
	September	640	388	124.2
	October	705	462	162.9
	November	556	462	128.4
	December	606	462	140.0
1996	January	279	462	64.4
	February	609	462	140.7
	March	707	462	163.3
	April	612	462	141.4
	May	630	388	122.2
	June	485	388	94.1
	July	688	388	133.5
	August	557	388	108.1
	September	603	388	117.0
	October	713	462	164.6
	November	384	462	88.7
	December	684	462	158.0
1997	January	624	462	144.1
	February	496	462	114.5
	March	630	462	145.4
	April	521	462	120.3
	May	175	388	34.0
	June	645	388	125.1
	July	703	388	136.4
			24-Month Total	2980
			<b>Annual Average</b>	<b>1490</b>

Therefore, the revised NOx average annual emission rate for Kiln #2 is 1490 tons.

As shown in Appendix A, this figure is added to the average annual emissions for Kiln #1 and results in source-wide baseline actual emissions of 2526 tons  $[(1055 + 1018)/2 + 1490 = 2526]$ .

Finally, the addition of the relevant NSR significant level (40 ton/yr) results in a revised NOx PAL of 2566 tons per year  $[2526 + 40 = 2566]$ .

(The respective revisions to Section E.1 of the permit are shown in Response to Comment 4.)

**Comment 4:**

Secondly, the SO2 PAL proposed in the permit is based on two separate stack tests completed on Kilns #1 and #2 in 2001 and 1996, respectively, each of which lasted less than 24 hours. We do not believe that these tests are adequate to establish the PAL in accordance with the definition of "baseline actual emissions" which states "the average rate shall not be based on any consecutive 24-month period for which there is inadequate information for determining annual emissions" (40 C.F.R. § 52.21(b)(48)(ii)(e)). Sulfur dioxide emissions from cement kilns are highly variable, as is evidenced by our review of continuous emission monitoring (CEM) data for this type of facility. We find that the establishment of a PAL based on less than one day of data from a facility with highly variable emissions, without sufficient information pertaining to the sulfur content of the raw material, is not adequate for the establishment of a PAL.

**Response to Comment 4:**

After extensive review of the subject, ESSROC has decided to withdraw its request for a SO2 PAL. The following changes were made to the permit as a result of this comment:

E.1.1 Emission limits [326 IAC 2-2.4-7(1)][326 IAC 2-3.4-7(1)]

- (a) ~~Oxides of Nitrogen (NO<sub>x</sub>) emissions from the entire source shall not exceed 2,672 2,566 tons per rolling twelve (12) month period with compliance determined at the end of each month. This provision does not supersede any other NO<sub>x</sub> emission limits contained in this permit.~~
- (a) ~~Sulfur Dioxide (SO<sub>2</sub>) emissions from the entire source shall not exceed 4,072 tons per rolling twelve (12) month period with compliance determined at the end of each month. This provision does not supersede any other SO<sub>2</sub> emission limits contained in this permit.~~

E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)] [326 IAC 2-3.4-1(c)]

- (a) ~~Any physical change or change in the method of operation of this source is not a major modification for NO<sub>x</sub>, and not subject to the review requirements of 326 IAC 2-2 and 326 IAC 2-3, provided the actual emissions of NO<sub>x</sub> from the entire source do not exceed the emission limit in Condition E.1.1(a) of this permit.~~
- (b) ~~Any physical change or change in the method of operation of this source is not a major modification for SO<sub>2</sub>, and not subject to the review requirements of 326 IAC 2-2, provided the actual emissions of SO<sub>2</sub> from the entire source do not exceed the emission limits in Condition E.1.1(b) of this permit.~~

...

E.1.5 ~~SO<sub>2</sub> Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) and (7)] [326 IAC 2-3.4-12]~~

~~The Permittee shall install, calibrate, maintain and operate a SO<sub>2</sub> continuous emission monitoring system (CEMS) on stacks S-14, S-15 and S-16. The CEMS shall be designed to determine actual emissions of SO<sub>2</sub> as described below:~~

- (a) ~~The SO<sub>2</sub> CEMS shall be certified according to procedures contained in 326 IAC 3 and 40 CFR 75 as applicable.~~
- (b) ~~Pursuant to 326 IAC 2-2.4-12(d) and 326 IAC 2-3.4-12(d), an owner or operator using CEMS to monitor PAL pollutant emissions shall meet the following requirements:~~
- (1) ~~CEMS must comply with applicable performance specifications found in 40 CFR Part 60, Appendix B; and~~
- (2) ~~CEMS must sample, analyze, and record data at least every fifteen (15) minutes while the emissions unit is operating.~~

E.1.6 5 Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13] [326 IAC 2-3.4-13]

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section, including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to, recorded data generated by the CEMS required by Conditions E.1.4 and E.1.5.

...

E.1.7 6 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14] [326 IAC 2-3.4-14]

- (a) ...
- (1) The identification of the owner and operator of the source and the permit number.

- (2) Total emissions of NO<sub>x</sub>, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.
- ~~(2) Total emissions of SO<sub>2</sub>, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.5.~~
- (3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.
- (4) A list of any emissions units modified or added to the major stationary source during the reporting period.
- (5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.

On March 22, 2008, ESSROC submitted comments on the proposed document. The following is a summary of the comments and responses to all comments. Added text is shown as bold and deleted text is shown as strikethrough. When conditions are added or deleted, the other conditions are renumbered accordingly, and the Table of Contents modified to reflect these changes.

#### Comment 5:

The PAL does not reflect changes made via Administrative Amendment 019-25019-00008, issued on September 7, 2007. These changes must be included. In addition, to the extent and references to ESPs remain in the permit, they are now irrelevant and should be deleted.

#### Response to Comment 5:

The following changes were made to incorporate AA 019-25019-00008:

(Sections A.3, D.3.5, D.3.11 and D.3.22)

...

- (111) One (1) Loesche raw mill, identified as EU14, constructed in 1977, with a nominal throughput of 300 tons per hour, with emissions controlled by one (1) ~~electrostatic precipitator~~ **baghouse**, identified as ~~ESP15~~ **baghouse 15**, and exhausting to stack S-15.

...

- (114) One (1) oil-fired furnace, referred to as the Todd Furnace, used for Loesche mill heating, identified as EU13, constructed in 1977, with a nominal heat input capacity of 55 million British thermal units per hour, with emissions controlled by one (1) ~~electrostatic precipitator~~ **baghouse**, identified as ~~ESP15~~ **baghouse 15**, and exhausting to stack S-15.

...

- (121) One (1) fuel oil-fired air heater for kiln #2 coal mill, identified as EU69, constructed in 1977, with a nominal heat input capacity of 5.3 million British thermal units per hour, with emissions exhausting directly to the kiln #2 coal mill controlled by one (1) ~~baghouse and two (2) electrostatic precipitators (ESPs), identified as baghouse 252, ESP15, and ESP16 (alkali bypass system), respectively,~~ **baghouse** and ~~ESP16 (alkali bypass system), respectively,~~ and exhausting to stacks ~~EP88, S-15, and S-16 respectively.~~

...

- (128) One (1) dry process rotary cement kiln #2 and associated preheater unit, equipped with an alkali bypass, identified as EU27, constructed in 1977, with a nominal heat input capacity of 302 million Btu per hour, with a nominal production rate of 105 tons per hour (as clinker), with PM emissions controlled by two (2) ~~electrostatic precipitators~~ **baghouses**, identified as **ESP15 baghouse 15** and **ESP16 baghouse 16** (alkali bypass system), and exhausting to stacks, identified as S-15 and S-16 respectively.

#### D.3.5 NESHAP Emissions Limitation [40 CFR Part 63, Subpart LLL]

---

- (a) Pursuant to 40 CFR 63.1343 (Emissions Standards and Operating Limits), on and after June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, kiln #1 and kiln #2 shall be limited as follows:

...

- (4) When kiln #2 and the Loesche raw mill (EU14) are both operating, the visible emissions from the ~~ESP baghouse~~ **controlling the Loesche raw mill and kiln #2** shall not exceed ten percent (10%) opacity. IDEM and USEPA have information that indicates that the Permittee is not in compliance with this opacity limit. The OAQ will promptly reopen this permit using the provisions of 326 IAC 2-7-9 (Permit Reopening) to include detailed requirements necessary to comply with this opacity limit and a schedule for achieving compliance with such requirement.
- (5) When the Loesche raw mill (EU14) is operating and the kiln #2 is not operating, the visible emissions from the ~~ESP baghouse~~ **controlling the Loesche raw mill** shall not exceed 10% opacity.
- (6) When the kiln #2 is operating and Loesche raw mill (EU14) is not operating, the visible emissions from the ~~ESP baghouse~~ **controlling kiln #2** shall not exceed 20% opacity.

#### D.3.11 Particulate Matter (PM) Control

---

Except as otherwise provided by statute, rule, or this permit, in order to comply with Conditions D.3.1, D.3.2, D.3.5, and D.3.8, the following conditions shall apply:

...

- (d) ~~The electrostatic precipitators ESP15 and ESP16~~ **Baghouse 15 and baghouse 16, for PM control**, shall be in operation at all times and control emissions from the kiln #2 and raw mill when the kiln #2 or the raw mill is in operation.

#### D.3.21 Record Keeping Requirements

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...

- (c) To document compliance with Conditions D.3.14 through D.3.19, the Permittee shall maintain records in accordance with (1) through (9) below. Records shall be complete and sufficient to establish compliance with the limits established in this section.
- (1) Data and results from the most recent stack tests.
- (2) All continuous emissions monitoring data.

~~(3) All ESP voltage and current monitoring readings as required by Condition D.3.16.~~

**(3) The results of all baghouse inspections and the type and number of parts replaced.**

...

**Comment 6:**

Clark County is designated as attainment for ozone under the 8-hour standard, which became effective on July 19, 2007 (72 FR 39571). Therefore, the Source Location Status in Condition A.1 should be revised to reflect this attainment status.

**Response to Comment 6:**

The following changes were made in response to this comment:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a portland cement manufacturing plant.

Source Address:	Highway 31, Speed, Indiana 47172
Mailing Address:	Highway 31, Speed, Indiana 47172-1305
General Source Phone Number:	812 246-5472
SIC Code:	3241
County Location:	Clark
Source Location Status:	<del>Nonattainment for PM<sub>2.5</sub> and for ozone under the 8-hour standard,</del> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 listed source categories

**Comment 7:**

Condition E.1.3(a) (General PAL Requirements):  
ESSROC recently determined that it needs significant time to upgrade its software and hardware for the additional NOx monitoring required by the PAL. Therefore, ESSROC requests that the effective date of the PAL provisions be changed to July 1, 2008.

**Response to Comment 7:**

The following changes were made to provide ESSROC with time to upgrade its NOx CEMS software and hardware in order to comply with the PAL provisions:

E.1.3 General PAL requirements [326 IAC 2-2.4-7 through 326 IAC 2-2.4-11][326 IAC 2-2.4-15][326 IAC 2-3.4-7 through 326 IAC 2-3.4-11][326 IAC 2-3.4-15]

(a) The requirements of this E Section become effective ~~on the issuance date of SPM 019-21450-00008,~~ **on July 1, 2008** and expire ten years after that date.

**Comment 8:**

The TSD reflects a total revision of Sections B and C. Instead it should be revised to reflect only the actual revisions to these Sections.

**Response to Comment 8:**

As documented in the TSD, the B and C sections of the permit were updated to reflect the current requirements for Part 70 permits.

The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

No changes were made to the permit as a result of this comment.

**Comment 9:**

Appendix A should be updated based on EPA comments.

**Response to Comment 9:**

See Response to Comment 3.

**Comment 10:**

Appendix B should be deleted since ESSROC has revoked its request for a SO2 PAL.

**Response to Comment 10:**

Appendix B is an Appendix to the Technical Support Document. The OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

No changes were made to the permit as a result of this comment.

**Comment 11:**

C.16 (Compliance Monitoring):  
Condition C.10 states that all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. ESSROC needs time to establish work practice standards and procedures to implement the new requirements associated with the established PAL. As a result, Condition C.16 (Corrective Actions and Response Steps) should be revised to specifically indicate that ESSROC has 90 days to comply with the requirements of the condition .

**Response to Comment 11:**

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

---

**On and after 90 days following the issuance of SPM 019-21450-00008:**

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

...

**Comment 12:**

C.11 (Maintenance of Continuous Emission Monitoring Equipment):  
Include a clause that this Condition does not apply to Continuous Opacity Monitoring Equipment. The applicable Section D requirements for COMS already include monitoring requirements in the event of a breakdown.

**Response to Comment 12:**

The following changes were made in response to this comment:

**C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

---

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.
- (c) **Conditions (a) and (b) above do not apply to continuous opacity monitoring equipment.**

**Comment 13:**

Condition B.12(e) (Permit Shield):  
Subconditions (e)(1) through (e)(4) (from the Part 70 permit) were accidentally deleted. Add them back into the permit.

Condition E.1.6(a) Reporting Requirements:  
Revise the permit to accurately indicate that the semi-annual report is due within 30 days of the end of the "semi-annual calendar period", rather than the "calendar quarter".

**Response to Comment 13:**

The following changes were made in response to these comments:

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

---

...

- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) **The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;**
  - (2) **The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;**
  - (3) **The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and**

**(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.**

E.1.6 Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14] [326 IAC 2-3.4-14]

- (a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the ~~calendar quarter~~ **semi-annual calendar period** being reported. This report requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). The report shall include the following information:

Upon further review, the IDEM, OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. Page 4 of Appendix B to the Technical Support Document mistakenly states "According to IDEM records, ESSROC did report any noncompliant SO<sub>2</sub> emissions over the baseline period." The sentence should have stated that ESSROC did NOT report any noncompliant SO<sub>2</sub> emissions. The OAQ prefers that the TSD reflect the permit that was on public notice. Changes to the permit or TSD and its appendices that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.
2. IDEM, OAQ has added the specific mail codes (MC) for each of the IDEM branches to the address as necessary in order to improve mail delivery:  
  
Indiana Department of Environmental Management  
100 North Senate Avenue  
Permits Branch: **MC 61-53 IGCN 1003**  
Compliance Branch: **MC 61-53 IGCN 1003**  
Air Compliance Section: **MC 61-53 IGCN 1003**  
Compliance Data Section: **MC 61-53 IGCN 1003**  
Asbestos Section: **MC 61-52 IGCN 1003**  
Technical Support and Modeling: **MC 61-50 IGCN 1003**  
Indianapolis, Indiana 46204-2251
3. In order to reduce the number of administrative amendments, IDEM, OAQ has decided to remove the identification of the Responsible Official in Condition A.1. IDEM will continue to maintain records of the name, title, and contact information for the responsible official.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a portland cement manufacturing plant.

~~Responsible Official:~~ \_\_\_\_\_ ~~Plant Manager~~

...

4. Condition B.12(b) of T019-6016-00008, issued June 15, 2004, was omitted from the permit. The following changes were made to re-include that condition:

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

...

- (b)** In addition to any nonapplicability determinations set forth in the D sections of this permit, the IDEM, OAQ has made the following determinations regarding this source:

**Construction Permit CP 019-3340-00008, issued on September 5, 1997, which allowed the source to burn waste tires as a fuel in their kilns, was voluntarily withdrawn by the source. The source is not permitted to burn waste tires.**

- (b c)** If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (e d)** No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (e f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]
5. On April 15, 2008, the source was issued AA 019-26369-00008. The following changes were made to the permit to incorporate this approval:

(Permit section A.2)

- (63)** One (1) cross belt for transferring clinker from the aumond conveyor to the long belt, identified as EU119, constructed in May 1971, with a nominal throughput of 150 tons per hour, with emissions controlled by a baghouse, identified as baghouse ~~235~~ **218**, and exhausting to one (1) stack identified as ~~EP24~~ **EP20**.
- ...
- (67)** One (1) covered incline belt (Shuttle belt) used for transferring clinker from the North clinker transfer tower to the North clinker storage building, identified as EU33, constructed in 1972, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse ~~220~~ **35931**, and exhausting to one (1) stack identified as ~~EP28~~ **EPN7**.
- ...
- (70)** North clinker storage building, identified as EU123, constructed in 1960-, **with emissions controlled by baghouse 35931 and exhausting to stack EPN7.**

- (71) One (1) North reclaim clinker covered conveyor system used to transfer clinker from the North clinker storage building **and baghouse dust from baghouse 35931** to either, 1) the South reclaim clinker covered conveyor system (EU124) or, 2) the 2D finish mill clinker bin transfer (EU44) transfer tower (covered conveyor), identified as EU34, constructed in 1962, with a nominal throughput of 200 tons per hour, with emissions controlled by a baghouse, identified as baghouse 245, and exhausting to one (1) stack identified as EP29.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD)  
for a Plantwide Applicability Limitation (PAL) Permit  
and a  
Part 70 Significant Permit Modification**

**Source Description and Location**

Source Name:	ESSROC Cement Corporation
Source Location:	301 Highway 31, Speed IN 47172-1305
County:	Clark
SIC Code:	3241
Operation Permit No.:	T019-6016-00008
Operation Permit Issuance Date:	June 15, 2004
Significant Permit Modification No.:	019-21450-00008
Permit Reviewer:	ERG/BS

**Existing Approvals**

The source was issued Part 70 Operating Permit No. T019-6016-00008 on June 15, 2004. The source has not received any other approvals since that time.

**County Attainment Status**

The source is located in Clark County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>10</sub>	Attainment
PM <sub>2.5</sub>	Basic Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for 326 IAC 2-3 (Emission Offset).
- (b) Clark County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM<sub>2.5</sub> emissions, it has directed states to regulate PM<sub>10</sub> emissions as surrogate for PM<sub>2.5</sub> emissions pursuant to the Nonattainment New Source Review requirements. See the *State Rule Applicability – Entire Source* section of this document for more information.
- (c) Clark County has been classified as attainment or unclassifiable for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (d) Since this source is classified as a portland cement plant, it is considered to be in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) Fugitive Emissions  
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
----------------------

The table below summarizes the potential to emit of the entire source after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM <sub>10</sub>	Greater than 100
PM <sub>2.5</sub> *	Greater than 100
SO <sub>2</sub>	Greater than 100
VOC	Greater than 100
CO	Greater than 100
NO <sub>x</sub>	Greater than 100

\* Estimated; using PM<sub>10</sub> as a surrogate for PM<sub>2.5</sub>.

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3) because VOC is potentially emitted at a rate of 100 tons per year or more and Clark County is designated as basic nonattainment for the 8-hr ozone standard.
- (c) This existing source is a major stationary source under nonattainment NSR because PM<sub>2.5</sub> is potentially emitted at a rate of 100 tons per year or more and Clark County is designated as basic nonattainment for PM<sub>2.5</sub>.
- (d) These emissions are based upon the emissions information contained in the TSD for T019-6016-00008 issued on June 15, 2004.

The table below summarizes the potential to emit HAPs for the entire source after consideration of all enforceable limits established in the effective permits:

HAPs	Potential To Emit (tons/year)
Single HAPs	Greater than 10
Total HAPs	Greater than 25

- (a) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because the HAP PTE is greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).
- (b) These emissions are based upon the emissions information contained in the TSD for T019-6016-00008 issued on June 15, 2004.

### Actual Emissions

The following table presents the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (ton/yr)
PM <sub>2.5</sub>	436
PM <sub>10</sub>	1,165
SO <sub>2</sub>	2,870
VOC	55
CO	2,552
NO <sub>2</sub>	1,760
HAP	Not reported

### Background and Description of Permit Modification

The Office of Air Quality (OAQ) received a Significant Permit Modification application from ESSROC Cement Corporation ("ESSROC") on July 13, 2005 for a Plant wide Applicability Limitation (PAL) for SO<sub>2</sub> and NO<sub>x</sub> relating to the operation of a stationary portland cement plant. ESSROC was issued a Part 70 permit (T019-6016-00008) on June 15, 2004. That permit included applicable SO<sub>2</sub> and NO<sub>x</sub> limitations from 326 IAC. In order to provide maximum operational flexibility, ESSROC requested a PAL for SO<sub>2</sub> and NO<sub>x</sub>.

Once issued, the PAL permit provisions will enable ESSROC to install new equipment, expand existing operations, add new operations, and modify its processes without the changes being subject to Major New Source Review (NSR) requirements in 326 IAC 2-2 and 326 IAC 2-3 as long as ESSROC maintains compliance with the PAL provisions.

The SO<sub>2</sub> and NO<sub>x</sub> PALs apply to the entire plant site, which includes the following types of units and operations:

- (a) Raw mill operations: Todd furnace EU13. EU13 exhausts to Kiln #2 (EU27) which exhausts to stacks S-15 and S-16.
- (b) Coal processing operations: Air heaters EU68 and EU69. EU68 exhausts to Kiln #1 (EU20) which exhausts to stack S-14. EU69 exhausts to Kiln #2 (EU27) which exhausts to stacks S-15 and S-16.
- (c) Kiln operations: Kiln #1 (EU20) and Kiln #2 (EU27). EU20 exhausts to stack S-14. EU27 exhausts to stacks S-15 and S-16.
- (d) All additional activities that have the PTE SO<sub>2</sub> or NO<sub>x</sub>. This includes significant and insignificant activities.

### Enforcement Issues

IDEM's Office of Enforcement is aware of the following violations and is currently working to resolve them through an Agreed Order with the Permittee:

326 IAC 10-1-6 - Invalid NO<sub>x</sub> emission data from Kiln 1 from June 11, 2002 - April 9, 2003.

326 IAC 10-1-6 - Invalid NO<sub>x</sub> emission data from Kiln 2 from April 9, 2003 through June 22, 2004 and from July 21, 2004 through August 17, 2004.

326 IAC 10-1-4 - Exceeded NO<sub>x</sub> emission limits from Kiln 1 during 2<sup>nd</sup> Q 2003, 4<sup>th</sup> Q 2003, 1<sup>st</sup> Q 2004 and 2<sup>nd</sup> Q 2004.

326 IAC 3-5 - COM downtime from the Kiln 1 Clinker Cooler during 1<sup>st</sup> Q 2003.

326 IAC 6-4-2 - Fugitive Dust.

326 IAC 20-27 and 40 CFR 63, Subpart LLL - Exceeded 10% opacity limit from North Reclaim Belt and North Transfer Tower on December 3-5, 2002.

326 IAC 6-1-2 and permit 019-6016-00008 Condition D.3.2(a) - Failed PM stack test of sidewinder (EU15) raw mill facility on March 4, 2005.

### Emission Calculations

#### Baseline Actual Emissions

Baseline actual emissions are defined in 326 IAC 2-2-1(e) and 326 IAC 2-3-1(d) as the average actual emissions from any 24 month period of the last 10 years. ESSROC selected a baseline period of the 24 month period beginning August 1, 1995 and ending July 31, 1997 for SO<sub>2</sub> and NO<sub>x</sub>.

Pollutant	Emissions from 8/1/95 to 7/31/96 (ton/yr)	Emissions from 8/1/96 to 7/31/97 (tons/yr)	Baseline Actual Emissions (tons/yr)
SO <sub>2</sub>	4101	3965	4032
NO <sub>x</sub>	2690	2574	2632

#### PAL Emissions Limit

The OAQ has determined that the SO<sub>2</sub> Plant wide Applicability Limitation (PAL) for this source is **4,072 tons per year**.

The OAQ has determined that the NO<sub>x</sub> Plant wide Applicability Limitation (PAL) for this source is **2,672 tons per year**.

See Appendices A and B for the development of the Baseline Actual Emissions and PALs.

### Federal Rule Applicability Determination

40 CFR 51.166(w), 326 IAC 2-2.4, and 326 IAC 2-3.4 (Plant wide Applicability Limitations) These rules provide for the use of plantwide applicability limitations (PAL). ESSROC has requested PALs for SO<sub>2</sub> and NO<sub>x</sub>.

Pursuant to 326 IAC 2-2.4-1(a) and 326 IAC 2-3.4-1(a), a source that is subject to P.L. 231-2003, Section 6 shall comply with the requirements of 326 IAC 2-2.6. ESSROC does not belong to one of the SIC codes listed in the 326 IAC 2-2.6 (Federal Requirements for Sources Subject to PL 231-2003, Endangered Industries), therefore, ESSROC is not subject to 326 IAC 2-2.6.

Pursuant to 326 IAC 2-2.4-1(b) and 326 IAC 2-3.4-1(b), the OAQ may approve the use of a PAL for any existing major stationary source if the PAL meets the requirements in (326 IAC 2-2.4) and 326 IAC 2-3.4.

Pursuant to 326 IAC 2-2.4-1(c) and 326 IAC 2-3.4-1(c), if ESSROC maintains its total source-wide SO<sub>2</sub> and NO<sub>x</sub> emissions below the PAL levels, meets the requirements in this rule, and complies with the PAL permit, then any physical change in or change in the method of operation of the source:

- (1) Is not a major modification for the PAL permit;

- (2) Does not have to be approved through 326 IAC 2-2 or 326 IAC 2-3; and
- (3) Is not subject to 326 IAC 2-2-8(a)(3) or 326 IAC 2-3-2(d).

Pursuant to 326 IAC 2-2.4-1(d), except as provided under subsection (b)(3) and 326 IAC 2-3.4-1(d), except as provided under subsection (c)(3), ESSROC shall continue to comply with all applicable federal or state requirements, emissions limitations, and work practice requirements that were established prior to the effective date of the PALs.

#### 40 CFR Part 64 (Compliance Assurance Monitoring (CAM))

In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit has potential emissions (before controls), of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source, 2) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, and 3) the unit uses a control device to achieve compliance with the applicable emission limitation or standard.

Pursuant to 40 CFR 64.5(a)(3), the Permittee is required to submit the information required under 40 CFR 64.4 regarding the facilities at this source as part of the Part 70 renewal application because the Part 70 application was submitted prior to April 20, 1998.

### **State Rule Applicability Determination and Requirements**

The following state rules are applicable to the source for this PAL permit:

#### 326 IAC 2-2.4-7 and 326 IAC 2-3.4-7(Contents of the PAL permit)

- (a) The PAL permit must contain, at a minimum, the following information:
  - (1) The PAL pollutant and the applicable source-wide emission limitation in tons per year.
  - (2) The PAL permit effective date and the expiration date of the PAL.
  - (3) Specification in the PAL permit that if the Permittee applies to renew a PAL before the end of the PAL effective period, then the PAL shall not expire at the end of the PAL effective period. It shall remain in effect until a revised PAL permit is issued by the department.
  - (4) A requirement that emission calculations for compliance purposes include emissions from startups, shutdowns, and malfunctions.
  - (5) A requirement that, once the PAL expires, the major stationary source is subject to the requirements of 326 IAC 2-2.4-9 and 326 IAC 2-3.4-9.
  - (6) The calculation procedures that the Permittee shall use to convert the monitoring system data to monthly emissions and annual emissions based on a twelve (12) month rolling total.
  - (7) A requirement that the Permittee monitor all emissions units in accordance with 326 IAC 2-2.4-12 and 326 IAC 2-3.4-12.
  - (8) A requirement to retain the records required under 326 IAC 2-2.4-13 and 326 IAC 2-3.4-13 on site. The records may be retained in an electronic format.
  - (9) A requirement to submit the reports required under 326 IAC 2-2.4-14 and 326 IAC 2-3.4-14 by the required deadlines.
  - (10) Any other requirements that IDEM deems necessary to implement and enforce the PAL.

326 IAC 2-2.4-8 and 326 IAC 2-3.4-8 (PAL effective period and reopening of the PAL permit)

The PAL effective period is ten (10) years.

326 IAC 2-2.4-9 and 326 IAC 2-3.4-9 (Expiration of a PAL)

- (a) If this PAL is not renewed in accordance with the procedures in 326 IAC 2-2.4-10 and 326 IAC 2-3.4-10 it shall expire at the end of the PAL effective period, and the requirements in this section shall apply.
- (b) Each emissions unit or each group of emissions units that existed under the PAL shall comply with an allowable emission limitation under a revised permit established.
- (c) Until IDEM issues the revised permit incorporating allowable limits for each emissions unit, or each group of emissions units, the Permittee shall continue to comply with a source-wide, multiunit emissions cap equivalent to the level of the PAL emission limitation.
- (d) Any physical change or change in the method of operation at the source will be subject to major NSR requirements if the change meets the definition of major modification in 326 IAC 2-2-1(ee) and 326 IAC 2-3-1(z).
- (e) The Permittee shall continue to comply with any state or federal applicable requirements that may have applied either during the PAL effective period or prior to the PAL effective period except for those emission limitations that had been established under 326 IAC 2-2-8(a)(3) and 326 IAC 2-3-2(d), but were eliminated by the PAL.

326 IAC 2-2.4-10 and 326 IAC 2-3.4-10 (Renewal of a PAL)

The Permittee shall submit a timely application to IDEM to request renewal of a PAL. A timely application is one that is submitted at least six (6) months prior to, but not earlier than eighteen (18) months from the date of PAL expiration. If the Permittee submits a complete application to renew the PAL within this time period, then the PAL shall continue to be effective until the revised permit with the renewed PAL is issued.

326 IAC 2-2.4-11 and 326 IAC 2-3.4-11 (Increasing a PAL during the PAL Effective Period)

- (a) The department may increase a PAL emission limitation during the PAL effective period only if the major stationary source complies with the following provisions:
  - (1) The owner or operator of the major stationary source shall submit a complete application to request an increase in the PAL limit for a PAL major modification. The application shall identify the emissions units contributing to the increase in emissions so as to cause the major stationary source's emissions to equal or exceed its PAL.
  - (2) As part of this application, the major stationary source owner or operator shall demonstrate that the sum of the baseline actual emissions of the small emissions units plus the sum of the baseline actual emissions of the significant and major emissions units assuming application of BACT equivalent controls plus the sum of the allowable emissions of the new or modified emissions units exceeds the PAL. The level of control that would result from BACT equivalent controls on each significant or major emissions unit shall be determined by conducting a new BACT analysis at the time the application is submitted unless the emissions unit is currently required to comply with a BACT or LAER requirement that was established within the preceding ten (10) years. In this case, the assumed control level for that emissions unit shall be equal to the level of BACT or LAER with which that emissions unit must currently comply.
  - (3) The owner or operator shall obtain a major NSR permit for all emissions units identified in subdivision (1) regardless of the magnitude of the emissions increase resulting from them. These emissions units shall comply with any emissions

requirements resulting from the major NSR process even though they have also become subject to the PAL or continue to be subject to the PAL.

- (4) The PAL permit shall require that the increased PAL level shall be effective on the day any emissions unit that is part of the PAL major modification becomes operational and begins to emit the PAL pollutant.
- (b) The department shall calculate the new PAL as the sum of the allowable emissions for each modified or new emissions unit plus the sum of the baseline actual emissions of the significant and major emissions units, assuming application of BACT equivalent controls as determined in accordance with subsection (a)(2), plus the sum of the baseline actual emissions of the small emissions units.
- (c) The PAL permit must be revised to reflect the increased PAL level under the public notice requirements of section 5 of this rule.

326 IAC 2-2.4-12 and 326 IAC 2-3.4-12 (Monitoring requirements for PAL)

- (a) The following general requirements apply:
  - (1) Each PAL permit must contain enforceable requirements for the monitoring system that accurately determine plantwide emissions of the PAL pollutants in terms of mass per unit of time. Any monitoring system authorized for use in the PAL permit must be based on sound science and meet generally acceptable scientific procedures for data quality and manipulation. Additionally, the information generated by the system must meet minimum legal requirements for admissibility in a judicial proceeding to enforce the PAL permit.
  - (2) The PAL monitoring system must employ one (1) or more of the four (4) general monitoring approaches meeting the minimum requirements set forth in subsection (b) and must be approved by the department.
  - (3) Notwithstanding subdivision (2), an alternative monitoring approach may be employed:
    - (A) that meets subdivision (1); and
    - (B) if it is approved by the IDEM.
  - (4) Failure to use a monitoring system that meets the requirements of this section renders the PAL invalid.
- (b) The followings are acceptable general monitoring approaches when conducted in accordance with the minimum requirements in subsections (c) through (i):
  - (1) Mass balance calculations for activities using solvents.
  - (2) CEMS.
  - (3) CPMS or PEMS.
  - (4) Emission factors.
- (c) The Permittee when using mass balance calculations to monitor PAL pollutant emissions from activities using solvents shall meet the following requirements:
  - (1) Provide a demonstrated means of validating the published content of the PAL pollutant that is contained in or created by all materials used in or at the emissions unit.

- (2) Assume that the emissions unit emits the entire PAL pollutant that is contained in or created by any raw material or fuel used in or at the emissions unit if it cannot otherwise be accounted for in the process.
- (3) Where the vendor of a material or fuel, which is used in or at the emissions unit, publishes a range of pollutant content from the material, the Permittee must use the highest value of the range to calculate the PAL pollutant emissions unless the IDEM determines there is site-specific data or a site-specific monitoring program to support another content within the range.
- (d) The Permittee, when using CEMS to monitor PAL pollutant emissions, shall meet the following requirements:
  - (1) CEMS must comply with applicable performance specifications found in 40 CFR Part 60, Appendix B; and
  - (2) CEMS must sample, analyze, and record data at least every fifteen (15) minutes while the emissions unit is operating.
- (e) The Permittee when using emission factors to monitor PAL pollutant emissions shall meet the following requirements:
  - (1) All emission factors shall be adjusted, if appropriate, to account for the degree of uncertainty or limitations in the factors development.
  - (2) The emissions unit shall operate within the designated range of use for the emission factor if applicable.
  - (3) If technically practicable, the Permittee that relies on an emission factor to calculate PAL pollutant emissions shall conduct validation testing to determine a site-specific emission factor within six (6) months of PAL permit issuance unless the IDEM determines that testing is not required.
- (f) The Permittee must record and report maximum potential emissions without considering enforceable emission limitations or operational restrictions for an emissions unit during any period of time that there is no monitoring data unless another method for determining emissions during the periods is specified in the PAL permit.
- (g) All data used to establish the PAL pollutant must be revalidated through performance testing or other scientifically valid means approved by the IDEM. The testing must occur at least once every five (5) years after issuance of the PAL.

326 IAC 2-2.4-13 and 326 IAC 2-3.4-13 (Record keeping requirements)

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with any requirement of this rule and of the PAL, including a determination of each emissions unit's twelve (12) month rolling total emissions, for five (5) years from the date of the record.
- (b) The Permittee shall retain a copy of the following records for the duration of the PAL effective period plus five (5) years:
  - (1) A copy of the PAL permit application and any applications for revisions to the PAL.
  - (2) Each annual certification of compliance pursuant to 40 CFR Part 70 and the data relied on in certifying the compliance.

326 IAC 2-2.4-14 and 326 IAC 2-3.4-14 (Reporting and notification requirements)

The Permittee shall submit semiannual monitoring reports and deviation reports to the IDEM in accordance with 326 IAC 2-7.

326 IAC 6.5-1 (formerly 326 IAC 6-1) and 326 IAC 6.5-2-4 (formerly 326 IAC 6-1-17)  
Pursuant to T019-6016-00008, issued June 15, 2004, this source was subject to the requirements of 326 IAC 6-1-2 and 326 IAC 6-1-17. On September 1, 2005, 326 IAC 6-1 was repealed and replaced with 326 IAC 6.5-1 (for sources not in Lake County) and 326 IAC 6.8-1 (for sources in Lake County). Specific to this source, 326 IAC 6-1-2 and 326 IAC 6-1-17 were replaced with 326 IAC 6.5-1-2 and 326 IAC 6.5-2-4, respectively. As a result, the OAQ is using this permit modification to update the Part 70 permit for all the affected facilities. Note that the emission limitations formerly required by 326 IAC 6-1 have not been changed under 326 IAC 6.5. See the *Proposed Changes* section of this document.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in 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 determination and monitoring requirements applicable to this PAL permit are included in Conditions E.1.4 and E.1.5 of the attached permit and are shown in the Proposed Changes section below. Those monitoring conditions are necessary to ensure compliance with the PAL.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T019-6016-00008 to: 1) incorporate the PAL and the applicable PAL requirements and 2) revise general Part 70 permit language. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**.

#### Changes to Section B, Section C, and Section D

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of the Section B – Preventive Maintenance condition and has amended the Section B – Emergency Provisions condition. IDEM has clarified the Section B Operational Flexibility condition.

IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed.

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have also been revised to reflect the new condition title.

IDEM has determined that once per day monitoring of the control device (or of visible emission notations) is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. As a result, the monitoring frequency of visible emission notations and parametric monitoring has been changed from once per shift to once per day.

For multi-compartment baghouses, the permit will no longer specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition.

The Broken and Failed Bag Detection conditions have been revised for those processes that operate in batch mode. The condition required an emission unit to be shut down immediately in case of baghouse failure. However, IDEM is aware there can be safety issues with shutting down a process in the middle of a batch. IDEM also realizes that in some situations, shutting down an emissions unit mid-process can cause equipment damage. Therefore, since it is not always possible to shut down a process with material remaining in the equipment, IDEM has revised the condition to state that in the case of baghouse failure, the feed to the process must be shut off immediately, and the process shall be shut down as soon as practicable.

The Pressure Gauge and Other Instrument condition has been modified because IDEM realizes that there are specifications can only be practically applied to analog units, and has therefore clarified the condition (now titled Instrument Specifications) to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

Upon further review, IDEM has decided to remove (d) concerning non-road engines from Section B – Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of non-road engines, such as regulations on hours of usage, daily mass emission limits or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

Section B – General Conditions have been revised, deleted or added to the permit to clarify the permit and condition terms. Rule citations have also been updated. When conditions are added or deleted, the other conditions are renumbered accordingly and the Table of Contents modified to reflect these changes. (Note this statement covers the addition of B.2 Term of Conditions, changes made to B.3 Terms of Conditions and B.17 Permit Renewal).

Section C – Recordkeeping and Reporting requirements have been modified to incorporate NSR Reform changes for major PSD and/or EO sources.

## **SECTION B — GENERAL CONDITIONS**

### **B.1 — Definitions [326 IAC 2-7-1]**

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.2 — Permit Term [326 IAC 2-7-5(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.3 — Enforceability [326 IAC 2-7-7]**

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.4 — Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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 2-7-3 and 326 IAC 2-7-4(a).

### **B.5 — Severability [326 IAC 2-7-5(5)]**

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.6 — Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

### **B.7 — Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

(a) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) 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.8 — Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

(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 a responsible official 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) A responsible official is defined at 326 IAC 2-7-1(34).

### **B.9 — Annual Compliance Certification [326 IAC 2-7-6(5)]**

- ~~(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 April 15 of each year 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~~

~~and~~

~~United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

- ~~(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 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 2-7-5(3); and~~
- ~~(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.~~

~~The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]~~

- ~~(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(d) To the extent the Permittee is required by 40 CFR Part 63 to have an Operations and Maintenance (O&M) Plan for a unit, such plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.~~

~~B.11 Emergency Provisions [326 IAC 2-7-16]~~

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- ~~(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 otherwise provided in 326 IAC 2-7-16.~~
- ~~(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 the IDEM Southwest 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;~~~~
- ~~(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:~~

~~IDEM Southwest Regional Office  
Telephone Number: 812-436-2570  
Facsimile Number: 812-436-2572~~

~~IDEM Southwest Regional Office~~

208 Northwest 4<sup>th</sup> Street  
Suite 201  
Evansville, Indiana 47708

~~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 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(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, and the IDEM Southwest Regional Office may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4 (c)(9) be revised in response to an emergency.~~
- ~~(f) — Failure to notify the IDEM Southwest Regional Office 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 2-7 and any other applicable rules.~~
- ~~(g) — 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.~~
- ~~(h) — The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.~~

~~B.12 — Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]~~

- ~~(a) — Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.~~

~~This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.~~

- ~~(b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:~~
- ~~(1) Construction Permit CP019-3340-00008, issued on September 5, 1997, which allowed the source to burn waste tires as a fuel in their kilns, has been voluntarily withdrawn by the source. The source is no longer permitted to burn waste tires.~~
  - ~~(2) All previous permits issued to this source listed 326 IAC 6-3-2 (Process Operations) or 326 IAC 6-2 (Particulate Limitations for Sources of Indirect Heating) as being applicable requirements. None of these conditions are applicable because IDEM, OAQ has determined that 326 IAC 6-1 is applicable to all particulate emitting facilities at this source.~~
- ~~(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.~~
- ~~(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.~~
- ~~(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:~~
- ~~(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;~~
  - ~~(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;~~
  - ~~(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and~~
  - ~~(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.~~
- ~~(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).~~
- ~~(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]~~
- ~~(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]~~

~~B.13 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) — deleted~~

~~by this permit.~~

~~(b) — All previous registrations and permits are superseded by this permit. —~~

~~B.14 — Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)]~~

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~~(a) — Deviations from any permit requirements (for emergencies see Section B – Emergency Provisions), 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 not need to be included in this report.~~

~~The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

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

~~B.15 — Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]~~

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~~(a) — This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

~~(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 2-7-9(a)(3)]~~

~~(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 2-7-9(b)]~~

~~(d) — The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]~~

~~B.16 Permit Renewal [326 IAC 2-7-4]~~

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- ~~(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 2-7-4. 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~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, Indiana 46206-6015~~

~~(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]~~

~~(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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.~~

~~(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]~~

~~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 2-7 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 being needed to process the application.~~

~~(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]~~

~~If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.~~

~~B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]~~

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- ~~(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~
- ~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

~~B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]  
[326 IAC 2-7-12 (b)(2)]~~

- ~~(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.~~
- ~~(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.~~

~~B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]~~

- ~~(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 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 2-7-~~

~~20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.~~

~~Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).~~

~~(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

~~(1) A brief description of the change within the source;~~

~~(2) The date on which the change will occur;~~

~~(3) Any change in emissions; and~~

~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(c) Emission Trades [326 IAC 2-7-20(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 2-7-20(c).~~

~~(d) Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.~~

~~B.20 Source Modification Requirement [326 IAC 2-7-10.5]~~

~~A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.~~

~~B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]~~

~~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 Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;~~

~~(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;~~

~~(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;~~

~~(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and~~

- (e) ~~As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, 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 2-7-11]~~

- (a) ~~The Permittee must comply with the requirements of 326 IAC 2-7-11 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (c) ~~The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]~~

~~B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [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) ~~Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.~~

~~B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source

**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**G.1 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 forty percent (40%) 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.2 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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.~~

~~C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]~~

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

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

~~(a) 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). 326 IAC 6-4-2(4) is not federally enforceable.~~

~~(b) In order to comply with 326 IAC 6-4, the Permittee shall comply with the fugitive dust control plan, which includes the following requirements:~~

- ~~(1) Vehicular traffic shall follow established roadways (paved and unpaved) and observe the POSTED speed limit of 15 mph (excluding the quarry).~~
- ~~(2) Individuals responsible for loading, unloading, and/or transfer of materials will be trained in Best Management Practices (BMPs) which will minimize or eliminate fugitive emissions and include instruction on:
  - ~~(A) Filling the transportation containers properly by not overfilling;~~
  - ~~(B) Loading trucks so that no part of the load comes within 6 inches of the top of any sideboard, side panel, or tail gate;~~
  - ~~(C) Filling the loader bucket properly by not overfilling;~~
  - ~~(D) Minimize free fall heights; and,~~
  - ~~(E) Taking all reasonable precautionary measures to reduce or eliminate the generation of fugitive dust.~~~~
- ~~(3) Feeders for unloading & transfer operations will be connected directly to bins, hoppers and tanks.~~
- ~~(4) Leaks in potential sources of fugitive emissions will be repaired in a timely manner.~~
- ~~(5) Paved roads and parking lots in the plant will be swept on a daily basis (Monday-Friday), weather permitting. The sweeper will not be operated during rainy days.~~
- ~~(6) Unpaved roads will be watered, as needed. Due to safety concerns, road watering will not be conducted when the temperature is below 35°F or when the temperature is expected to fall below freezing while the roads are wet.~~
- ~~(7) The C-4 belt water spray dust suppression system will be replaced by May 31, 2004. This system will be operated on a continuous basis while the material handling~~

equipment is in operation, except during freezing conditions which could cause material handling problems (at temperatures below 35° or when the temperatures are expected to be below freezing while the material is wet).

~~(8) — Stock/Storage Piles~~

~~The areas around the Stock/Storage Piles are to be maintained in such a manner as to minimize the potential for fugitive particulate matter emissions.~~

~~(A) — The area around the Piles is to be swept or watered as necessary.~~

~~(B) — Restrict traffic flow in and around the storage areas.~~

~~(9) — Clinker Storage Building Dust Control Plan~~

~~The openings in the roof and sides of the building will be sealed, and all belts will be covered. This phase of the clinker building dust control plan will be completed by May 31, 2004.~~

~~By July 31, 2004, Essroc will submit to IDEM a report including a description of the actions taken with respect to the Clinker Storage Building and an evaluation of the effectiveness of those actions.~~

~~C.5 — Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or 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.6 — 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(a)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.~~

~~C.7 — Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]~~

~~The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140 when conducting any asbestos abatement project covered by those rules.~~

**Testing Requirements [326 IAC 2-7-6(1)]**

~~C.8 — 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- (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.9 Compliance Requirements [326 IAC 2-1.1-11]~~**

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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. The Permittee shall have the right to seek administrative or judicial review of an order to test.

### **~~Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]~~**

#### **~~C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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 ninety (90) 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 ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

#### **~~C.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~**

---

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.
- (b) All continuous opacity monitoring systems shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the time and reason of the breakdown and efforts made to correct the problem.

#### **~~C.12 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]~~**

---

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.

- (b) ~~All continuous emission monitoring systems shall meet all applicable performance specifications of 40 CFR 60 or any other performance specification, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.~~
- (c) ~~In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.~~
- (d) ~~Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or is down for maintenance or repairs, the following shall be used as an alternative to continuous data collection:~~
- (1) ~~If the CEM is required for monitoring NO<sub>x</sub> or SO<sub>2</sub> emissions pursuant to 40 CFR 75 (Title IV Acid Rain program) or 326 IAC 10-4 (NO<sub>x</sub> Budget Trading Program), the Permittee shall comply with the relevant requirements of 40 CFR 75 Subpart D - Missing Data Substitution Procedures.~~
- (2) ~~If the CEM is not used to monitor NO<sub>x</sub> or SO<sub>2</sub> emissions pursuant to 40 CFR 75 or 326 IAC 10-4, then supplemental or intermittent monitoring of the parameter shall be implemented as specified in Section D of this permit until such time as the emission monitor system is back in operation.~~
- (e) ~~Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 10-1 and/or 326 IAC 10-3.~~

~~C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]~~

---

~~Any monitoring or testing 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.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

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- (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) ~~Whenever a condition in this permit requires the measurement of a temperature, or T-R set voltage or current, the instrument 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.~~
- (c) ~~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 2-7-5] [326 IAC 2-7-6]**

~~C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

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~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- (a) ~~The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~
- (b) ~~These ERPs shall be submitted for approval 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 ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) ~~If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- (d) ~~These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- (e) ~~Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- (f) ~~Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]~~

~~C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]~~

~~If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.~~

~~C.17 Compliance Response Plan Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]~~

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If the Permittee is required to have an Operations and Maintenance (O&M) Plan under 40 CFR 63, such plan shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. 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, maintained on site, and 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 time frame 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 or O&M Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or O&M Plan to include such response steps taken.~~

~~The O&M Plan shall be submitted within the time frames specified by the applicable 40 CFR 63 requirement.~~

~~(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 O&M Plan; or~~

- ~~(2) If none of the reasonable response steps listed in the Compliance Response Plan or O&M 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, and it will be 10 days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ 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 response steps shall be considered a deviation from 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 a minor permit modification 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, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (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.~~

~~G.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]~~

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- ~~(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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

### **~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~**

#### **~~C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]~~**

- ~~(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received 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 identified in 326 IAC 2-6-6. The emission statement shall meet the following requirements:~~

- ~~(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- ~~(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.~~

- ~~(b) 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) The annual 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.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]~~**

- ~~(a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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.21 General Reporting Requirements [326 IAC 2-7-5(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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(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 Data Section, 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 "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e) — The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.~~

~~C.22 — NESHAP Notification and Reporting Requirements [40 CFR Part 63, Subparts A, and LLL]~~

~~The Permittee shall comply with all reporting provisions specified in 40 CFR Part 63, Subpart LLL, and in particular:~~

~~(a) — The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b) (Subpart A, General Provisions). The Permittee provided the following information:~~

~~(1) — The name and address of the Permittee;~~

~~(2) — The address (i.e., physical location) of the affected source;~~

~~(3) — An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date;~~

~~(4) — A brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant, or if a definitive identification is not yet possible, a preliminary identification of each point of emission for each hazardous air pollutant; and~~

~~(5) — A statement of whether the affected source is a major source or an area source.~~

~~(b) — The Permittee shall submit a notification of performance tests, as required by 40 CFR 63.7 and 40 CFR 63.9(e).~~

~~(c) — The Permittee shall submit a notification of opacity and visible emission observations as required by 40 CFR 63.1349 in accordance with 40 CFR 63.6(h)(5) and 40 CFR 63.9(f).~~

~~(d) — The Permittee shall submit notification, as required by 40 CFR 63.9(g), of the date that continuous emission monitor performance evaluation required by 40 CFR 63.8(e) is scheduled to begin.~~

~~(e) — The Permittee shall submit notification of compliance status, as required by 40 CFR 63.9(h).~~

~~(f) — The notification(s) required in this section 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

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

### **Stratospheric Ozone Protection**

#### **C.23 — 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 B**

## **GENERAL CONDITIONS**

### **B.1 Definitions [326 IAC 2-7-1]**

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.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]**

- (a) This permit, T019-6016-00008, 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) If IDEM, OAQ, upon receiving a timely and complete renewal 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, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

### **B.3 Term of Conditions [326 IAC 2-1.1-9.5]**

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

**B.4 Enforceability [326 IAC 2-7-7]**

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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 Severability [326 IAC 2-7-5(5)]**

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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.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

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

**B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]**

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- (a) 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 "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) 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.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

---

- (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 a responsible official 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. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (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 no later than July 1st of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

**United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590**

- (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 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

**B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) 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  
Indianapolis, Indiana 46204-2251**

The PMP and the PMP extension notification do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) 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 PMPs does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).**

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**

**B.11 Emergency Provisions [326 IAC 2-7-16]**

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- (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.**
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe 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 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 Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or  
Telephone Number: 317-233-0178 (ask for Compliance Section)  
Facsimile Number: 317-233-6865**

- (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  
Indianapolis, Indiana 46204-2251**

**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 2-7-5(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 “responsible official” as defined by 326 IAC 2-7-1(34).

- (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) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) 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 2-7 and any other applicable rules.
- (g) 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.

**B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced 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 Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.  
  
This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the

**Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:**
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;**
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;**
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and**
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.**
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).**
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]**
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]**

**B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]**

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- (a) All terms and conditions of permits established prior to T019-6016-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either**
- (1) incorporated as originally stated,**
  - (2) revised under 326 IAC 2-7-10.5, or**
  - (3) deleted under 326 IAC 2-7-10.5.**
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.**

**B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

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**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 2-7-3 and 326 IAC 2-7-4(a).**

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), 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  
Indianapolis, Indiana 46204-2251**

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 not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized official” 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.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]**

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit 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 2-7-5(6)(C)] The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (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 2-7-9(a)(3)]
- (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 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(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 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]**

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- (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 2-7-4. 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 “responsible official” as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
  - (2) 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) 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 2-7 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 being needed to process the application.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 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  
Indianapolis, Indiana 46204-2251**
- Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

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**(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a 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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;**
- (3) The changes do not result in emissions which exceed the limitations provided in 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  
Indianapolis, Indiana 46204-2251**

**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, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b), (c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.**

**Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).**

**(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**

- (1) A brief description of the change within the source;**
- (2) The date on which the change will occur;**
- (3) Any change in emissions; and**
- (4) Any permit term or condition that is no longer applicable as a result of the change.**

**The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) **Emission Trades [326 IAC 2-7-20(c)]**  
The Permittee may trade emissions increases and decreases at 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 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(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 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2]**

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- (a) A modification, construction, or reconstruction is governed by the requirement of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and 326 IAC 2-2.4.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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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, OA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 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  
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (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) Except as provided in 326 IAC 2-7-19(e), 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 317-233-4230 (ask for OAQ Billing, Licensing, and Training Section), to determine the appropriate permit fee.

**B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]**

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For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

**SECTION C SOURCE OPERATION CONDITIONS**

Entire Source
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**Emission Limitations and Standards [326 IAC 2-7-5(1)]**

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(e)]**

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Pursuant to 326 IAC 6-3-2(e), 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.

**C.2 Opacity [326 IAC 5-1]**

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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 forty percent (40%) 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.3 Open Burning [326 IAC 4-1] [326 IAC 13-17-9]**

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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. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]**

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

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

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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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Stack Height [326 IAC 1-7]**

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

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- (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  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 14-10-4, 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) **Demolition and renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **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 to use an Indiana Accredited Asbestos inspector is not federally enforceable.

#### Testing Requirements [326 IAC 2-7-6(1)]

##### C.8 Performance Testing [326 IAC 3-6]

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- (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  
Indianapolis, Indiana 46204-2251

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 "responsible official" as defined by 326 IAC 2-7-1(34).

- (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 "responsible official" as defined by 326 IAC 2-7-1(34).
- (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.9 Compliance Requirements [326 IAC 2-1.1-11]

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. 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 2-7-5(1)] [326 IAC 2-7-6(1)]**

**C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) 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 ninety (90) 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  
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

**C.11 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing 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.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
  
within ninety (90) days after the date of issuance of this permit.  
  
The ERP does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

**C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
  - (1) initial inspection and evaluation;

- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
  - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
  - (2) review of operation and maintenance procedures and records;
  - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
  - (2) monitor performance data, if applicable; and
  - (3) corrective actions taken.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]**

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- (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 response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]**

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- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (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.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]**

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- (a) Records of all required monitoring data, reports and support information required by this permit 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 physically present or electronically accessible 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) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-3 (II)) at an existing emissions unit, other than projects at a Clean Unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and 326 IAC 2-3-3 (mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.

- (C) **A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:**
  - (i) **Baseline actual emissions;**
  - (ii) **Projected actual emissions;**
  - (iii) **Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(3); and**
  - (iv) **An explanation for why the amount was excluded, and any netting calculations, if applicable.**
- (2) **Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and**
- (3) **Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.**

**C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]**

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- (a) **The Permittee 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 “responsible official” as defined by 326 IAC 2-7-1(34).**
- (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 Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**
- (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 “responsible official” as defined by 326 IAC 2-7-1(34).**
- (e) **The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.**

- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any project (as defined in 326 IAC 2-2-1(qq) and 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee deems fit to include in this report:
- Reports required in this part shall be submitted to:
- Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251
- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

## Stratospheric Ozone Protection

### C.21 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.**

D.1.1 Particulate Matter (PM) [~~326 IAC 6-1-2 6.5-1-2~~][326 IAC 2-2]

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- (a) Pursuant to 326 IAC ~~6-1-2 6.5-1-2~~ (~~Nonattainment Area Particulate Limitations~~), the PM emissions rate from each of the raw material sizing operations, the kiln #1 cement kiln dust (CKD) operations, and the kiln #2 cement kiln dust (CKD) operations shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air.

...

D.1.4 Particulate Matter (PM) **Control**

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- (a) Except as otherwise provided by statute, rule, or this permit, in order to comply with the limits in Condition D.1.1, each baghouse for PM control shall be in operation at all times when its associated facility is in operation.
- (b) **In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.1.6 Visible Emissions Notations

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- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per ~~shift~~ **day** during normal daylight operations. A trained employee shall record whether visible emissions are present.
- (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 visible emissions for that specific process.
- (e) If visible emissions are observed ~~crossing the property line~~, the Permittee shall ~~implement the appropriate procedures as set out in its Compliance Response Plan~~ **take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances**. Failure to take response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~, **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.
- (f) ~~If visible emissions are present at any baghouse stack, the Permittee shall implement appropriate procedures as set out in its Compliance Response Plan for such facility. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

D.1.7 Parametric Monitoring

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The Permittee shall record the ~~static~~ pressure drop across each baghouse, **used in conjunction with the facilities listed in this section**, at least once per ~~shift~~ **day** when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack

test, the Permittee shall take reasonable response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances**. A pressure reading that is outside the normal 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~~, **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - ~~Pressure Gauge and Other Instrument 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**

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~~An inspection shall be performed each calendar quarter of all bags controlling the facilities listed in this section. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

#### ~~D.1.9~~ **8 Broken or Failed Bag Detection**

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~~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. 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 deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~

~~(b a) For a single compartment baghouses **controlling emissions from a process operated continuously**, if failure is indicated by a significant drop in the baghouse's pressure readings with visible emissions present 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 the **a** failed units and the associated process **will shall** be shut down immediately until the failed units **have has** 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).~~

~~(b) For a single compartment baghouse **controlling emissions from a batch process**, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).~~

#### ~~D.1.10~~ **9 Record Keeping Requirements**

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~~(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the baghouse stack exhausts once per shift **required by that condition**.~~

- (b) To document compliance with Condition D.1.7, the Permittee shall maintain records of the pressure drop **readings required by that condition across each baghouse once per shift.**
- ~~(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of the results of the inspections required under Condition D.1.8.~~
- (d c) To document compliance with Condition D.1.1(c), the Permittee shall maintain records of the number of holes drilled at the quarry. ~~All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~
- ~~(e) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (f d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

#### D.1.4110 Record Keeping Requirements

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##### D.2.1 Particulate Matter (PM) **Limitations** [326 IAC ~~6-4-2~~ **6.5-1-2**]

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Pursuant to 326 IAC ~~6-4-2~~ **6.5-1-2** (~~Nonattainment Area Particulate Limitations~~), the PM emissions ~~rate~~ from each of the miscellaneous facilities, clay processing operations, finish operations crane storage facilities, fossil fuel storage and handling facilities, kiln #1 clinker handling facilities, kiln #2 clinker handling facilities, clinker handling to crane storage facilities, 2ABC finish mill facilities, finish mill #2 facilities, finish product 501-silos storage and packing facilities, finish production 506-silos storage, packing, and bulk loading facilities, finish product 504-silos storage and bulk loading facilities, and finish product 502-silos storage and bulk loading facilities shall each not exceed 0.03 grains per dry standard cubic foot of exhaust air.

##### D.2.8 Particulate Matter (PM) **Control**

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- (a) Except as otherwise provided by statute, rule, or this permit, in order to comply with conditions D.2.1, D.2.3, and D.2.5, each baghouse for PM control shall be in operation at all times when its associated facility is in operation.
- (b) **In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

##### D.2.10 Visible Emissions Notations

---

- (a) Visible emission notations of each of the baghouse stack exhausts shall be performed once per ~~shift~~ **day** during normal daylight operations. A trained employee shall record whether ~~visible~~ emissions are present.
- (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 visible emissions for that specific process.

- (e) On days that the NESHAP, 40 CFR 63, Subpart LLL, monitoring required in Condition D.2.9 is performed, the Permittee may use those results to satisfy the requirements of this condition for the units subject to the NESHAP.
- (e) If visible emissions are present at any baghouse or ESP stack for which a COM is not operating **observed**, the Permittee shall implement the appropriate procedures as set out in its Compliance Response Plan for such facility **take reasonable response steps in accordance with Section C – Response to Excursions and Exceedances**. Failure to take response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~, **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

#### D.2.11 Baghouse Parametric Monitoring

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The Permittee shall record the static pressure drop across each baghouse, **used in conjunction with the facilities listed in this section**, at least once per shift day when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances**. A pressure reading that is outside the normal 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~~, **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

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

#### D.2.12 Baghouse Inspections

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~~An inspection shall be performed each calendar quarter of all bags controlling the facilities listed in this section. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~

#### D.2.1312 Broken or Failed Bag Detection

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~~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. 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 deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- (b a) For a single compartment baghouses **controlling emissions from a process operated continuously**, if failure is indicated by a significant drop in the baghouse's pressure readings with visible emissions present 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 the a failed units and the associated process **will shall** be shut down immediately until the failed units **have has** 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).

- (b) **For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).**

**D.2.1413** Record Keeping Requirements

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- (a) To document compliance with Condition D.2.10, the Permittee shall maintain records of visible emission notations ~~of the baghouse and ESP stack exhausts once per shift, whenever a COM is not being used~~ **required by that condition.**
- (b) To document compliance with Condition D.2.11, the Permittee shall maintain records of the pressure drop ~~of each baghouse once per shift~~ **readings required by that condition.**
- ~~(c) To document compliance with Condition D.2.12, the Permittee shall maintain records of the results of the baghouse inspections required under Condition D.2.12.~~
- (d c) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
  - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
    - (i) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
    - (ii) All records of applicability determination, including supporting analyses.
- ~~(e) To document compliance with Condition D.2.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~
- (fd) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.1614** Reporting Requirements

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...

**D.3.1** Particulate Matter (PM) [326 IAC ~~6-1-17~~ **6.5-2-4**]

Pursuant to 326 IAC ~~6-1-17 (Nonattainment Area Particulate Limitations: Clark County)~~ **326 IAC 6.5-2-4**, the following conditions shall apply:

...

**D.3.2** Particulate Matter (PM) [326 IAC ~~6-1-2~~ **6.5-1-2**] [326 IAC 2-2] [326 IAC 2-7-6(3)] [326 IAC 2-7-15]

- (a) Pursuant to 326 IAC ~~6-1-2 (Nonattainment Area Particulate Limitations)~~ **326 IAC 6.5-1-2**, the following conditions shall apply:

...

**D.3.11** Particulate Matter (PM) **Control**

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Except as otherwise provided by statute, rule, or this permit, in order to comply with Conditions D.3.1, D.3.2, D.3.5, and D.3.8, the following conditions shall apply:

...

- (i) **In the event that bag failure is observed in a multi-compartment bagfilter, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.**

D.3.14 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [40 CFR 63, Subpart LLL] [326 IAC 10-1] [326 IAC 10-3]

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...

- (g) In the event that a nitrogen oxide CEMS fails, the Permittee shall monitor the oxygen content and temperature of the kiln exhaust at least once per hour. If the oxygen content or temperature is outside the range established in the latest compliance stack test, the Permittee shall take reasonable response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances**. Failure to take response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

D.3.16 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

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- (a) The ability of the ESP to control particulate emissions shall be monitored once per ~~shift~~ **day**, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer-rectifier (T-R) sets.
- (b) Reasonable response steps shall be taken in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances** whenever the percentage of T-R sets in service falls below 90 percent (90%). T-R set failure resulting in less than 90 percent (90%) availability 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~~ **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

D.3.17 Opacity Readings

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...

- (3) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances**. Observation of abnormal emissions that do not violate an applicable opacity limit 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~~ **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

D.3.18 Method 9 Opacity Readings and Visible Emissions Notations

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The emission units and associated baghouses for which continuous opacity monitors are not used shall comply with the following requirements:

- (a) Visible emission notations of the baghouse stack exhausts shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are ~~present~~ **normal or abnormal**.
- ...
- (e) If ~~visible~~ **abnormal** emissions are present at any baghouse stack for which a COM is not required, the Permittee shall implement the appropriate procedures as set out in ~~its Compliance Response Plan~~ **Section C – Response to Excursions and Exceedances** for such facility. Failure to take response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

#### D.3.19 Baghouse Parametric Monitoring

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The Permittee shall record the ~~total static~~ pressure drop across each baghouse, at least once per ~~shift~~ **day** when the associated facility is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1.0 to 8.0 inches of water or the range established during the most recent stack test, the Permittee shall take reasonable response steps in accordance with ~~Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports~~ **Section C – Response to Excursions and Exceedances**. A pressure reading that is outside the normal 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~~ **Section C – Response to Excursions and Exceedances** shall be considered a deviation from this permit.

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

#### D.3.20 ~~Baghouse and ESP Inspections~~

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- (a) ~~An inspection shall be performed each calendar quarter of all bags controlling the facilities listed in this section. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.~~
- (b) ~~In order to document compliance with the applicable PM and dioxin/furan limits specified in Condition D.3.5 the following inspections shall be performed for each ESP during each annual shutdown, but no less often than once every 14 months, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B – Preventive Maintenance Plan:~~
- (1) ~~Plate and electrode alignment;~~
  - (2) ~~ESP component/controller failure;~~
  - (3) ~~Air and water infiltration; and~~
  - (4) ~~Calibration of the instruments used to determine the T-R set current and voltages. All inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past three months.~~

~~All inspections shall be made whenever there is an outage of any nature lasting more than three days unless such measurements have been taken within the past three months.~~

~~Appropriate response steps for any failures, malfunctions, or abnormal conditions in the above list found during the inspection shall be taken in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C – Compliance Response Plan –~~

~~Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.~~

#### D.3.2120 Broken or Failed Bag Detection

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~~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. 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 deviation from this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.~~
- (b a) For a single compartment baghouses **controlling emissions from a process operated continuously**, if failure is indicated by a significant drop in the baghouse's pressure readings with visible emissions present 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 the ~~a~~ failed units and the associated process ~~will~~ **shall** be shut down immediately until the failed units ~~have~~ **has** 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).
- (b) For a single compartment baghouse **controlling emissions from a batch process**, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. 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).

#### D.3.22 21 Record Keeping Requirements

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...

- (c) To document compliance with Conditions D.3.14 through ~~D.3.20~~ **D.3.19**, the Permittee shall maintain records in accordance with (1) through (9) below. Records shall be complete and sufficient to establish compliance with the limits established in this section.  
...
- ~~(4) The results of all baghouse and ESP inspections and the type and number of parts replaced.~~
- (5 4) Visible emission notations ~~once per shift for all baghouses~~ **required by Conditions D.3.17 and D.3.18.**
- (6 5) Method 9 opacity readings for the kilns and clinker coolers whenever required by this permit.

~~(7 6)~~ ~~Once per shift records of the p~~Pressure drop of each baghouse during normal operation when venting to the atmosphere **readings required by Condition D.3.19.**

~~(8)~~ All preventive maintenance measures taken.

~~(9 7)~~ All response steps taken and the outcome for each.

...

~~(g)~~ To document compliance with Condition D.3.9, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.

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

#### D.3.23 22 Reporting Requirements

...

#### D.5.1 Particulate Matter (PM) [326 IAC ~~6-1-2~~ **6.5-1-2**]

Pursuant to 326 IAC ~~6-1-2 (Nonattainment Area Particulate Limitations)~~ **6.5-1-2**, the allowable PM emissions rate from each of the underground conveyors, the coal bunker, and coal scale shall not exceed 0.03 grains per dry standard cubic foot of exhaust air.

### SECTION E.1 PLANTWIDE APPLICABILITY LIMITATION REQUIREMENTS

#### Facility Description [326 IAC 2-7-5(15)]

The entire plant site is subject to the Plant wide Applicability Limitation [PAL] requirements described in this E section.

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

#### Source Wide Emission Limits [326 IAC 2-2.4-7(1)] [326 IAC 2-3.4-7(1)]

##### E.1.1 Emission limits [326 IAC 2-2.4-7(1)][326 IAC 2-3.4-7(1)]

- (a) Oxides of Nitrogen (NO<sub>x</sub>) emissions from the entire source shall not exceed 2,672 tons per rolling twelve (12) month period with compliance determined at the end of each month. This provision does not supersede any other NO<sub>x</sub> emission limits contained in this permit.
- (a) Sulfur Dioxide (SO<sub>2</sub>) emissions from the entire source shall not exceed 4,072 tons per rolling twelve (12) month period with compliance determined at the end of each month. This provision does not supersede any other SO<sub>2</sub> emission limits contained in this permit.

#### General PAL Requirements [326 IAC 2-2.4-1] [326 IAC 2-3.4-1]

##### E.1.2 Major New Source Review Applicability [326 IAC 2-2.4-1(c)] [326 IAC 2-3.4-1(c)]

- (a) Any physical change or change in the method of operation of this source is not a major modification for NO<sub>x</sub>, and not subject to the review requirements of 326 IAC 2-2 and 326 IAC 2-3, provided the actual emissions of NO<sub>x</sub> from the entire source do not exceed the emission limit in Condition E.1.1(a) of this permit.
- (b) Any physical change or change in the method of operation of this source is not a major modification for SO<sub>2</sub>, and not subject to the review requirements of 326 IAC 2-2, provided the actual emissions of SO<sub>2</sub> from the entire source do not exceed the emission limits in Condition E.1.1(b) of this permit.

**E.1.3 General PAL requirements [326 IAC 2-2.4-7 through 326 IAC 2-2.4-11][326 IAC 2-2.4-15][326 IAC 2-3.4-7 through 326 IAC 2-3.4-11][326 IAC 2-3.4-15]**

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- (a) The requirements of this E Section become effective on the issuance date of SPM 019-21450-00008, and expire ten years after that issuance date.
- (b) If the Permittee applies to renew this PAL at least six months prior to expiration of the PAL, but no earlier than eighteen months prior to the expiration of the PAL, then notwithstanding the expiration date in subsection E.1.3(a), the PAL shall continue to be effective until the revised permit with the renewed PAL is issued. The application must contain the elements described in 326 IAC 2-2.4-3, 326 IAC 2-2.4-10, 326 IAC 2-3.4-3 and 326 IAC 2-3.4-10.
- (c) Once this PAL expires, if not otherwise renewed, then the requirements of 326 IAC 2-2.4-9 and 326 IAC 2-3.4-9 are applicable.
- (d) The requirements for renewing this PAL are described in 326 IAC 2-2.4-10 and 326 IAC 2-3.4-10.
- (e) The requirements for increasing the emissions limits described in Condition E.1.1 are described in 326 IAC 2-2.4-11 and 326 IAC 2-3.4-11.
- (f) The requirements applicable to terminating or revoking this PAL are described in 326 IAC 2-2.4-15 and 326 IAC 2-3.4-15.

**Monitoring Requirements [326 IAC 2-2.4-7(6) & (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) & (7)] [326 IAC 2-3.4-12]**

**E.1.4 NO<sub>x</sub> Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) and (7)] [326 IAC 2-3.4-12]**

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The Permittee shall install, calibrate, maintain and operate a NO<sub>x</sub> continuous emission monitoring system (CEMS) on stacks S-14, S-15 and S-16. The CEMS shall be designed to determine actual emissions of NO<sub>x</sub> as described below:

- (a) The Permittee shall comply with the requirements of Conditions D.3.14(e) – (g).
- (b) Pursuant to 326 IAC 2-2.4-12(d) and 326 IAC 2-3.4-12(d), an owner or operator using CEMS to monitor PAL pollutant emissions shall meet the following requirements:
  - (1) CEMS must comply with applicable performance specifications found in 40 CFR Part 60, Appendix B; and
  - (2) CEMS must sample, analyze, and record data at least every fifteen (15) minutes while the emissions unit is operating.

**E.1.5 SO<sub>2</sub> Emission Limit Determination [326 IAC 2-2.4-7(6) and (7)] [326 IAC 2-2.4-12] [326 IAC 2-3.4-7(6) and (7)] [326 IAC 2-3.4-12]**

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The Permittee shall install, calibrate, maintain and operate a SO<sub>2</sub> continuous emission monitoring system (CEMS) on stacks S-14, S-15 and S-16. The CEMS shall be designed to determine actual emissions of SO<sub>2</sub> as described below:

- (a) The SO<sub>2</sub> CEMS shall be certified according to procedures contained in 326 IAC 3 and 40 CFR 75 as applicable.
- (b) Pursuant to 326 IAC 2-2.4-12(d) and 326 IAC 2-3.4-12(d), an owner or operator using CEMS to monitor PAL pollutant emissions shall meet the following requirements:

- (1) CEMS must comply with applicable performance specifications found in 40 CFR Part 60, Appendix B; and
- (2) CEMS must sample, analyze, and record data at least every fifteen (15) minutes while the emissions unit is operating.

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

**E.1.6 Record keeping requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-13] [326 IAC 2-3.4-13]**

- (a) The Permittee shall retain a copy of all records necessary to determine compliance with the requirements of this E Section, including a determination of each emissions unit's twelve (12) month rolling total emissions, for five years from the date of the record. Those records include, but are not limited to, recorded data generated by the CEMS required by Conditions E.1.4 and E.1.5.
- (b) The Permittee shall retain a copy of the PAL permit application, any applications for revisions to the PAL, each annual compliance certification as required by Condition B.9 of this permit, and data relied on in the certification for the duration of the PAL plus five years.

**E.1.7 Reporting requirements [326 IAC 2-7-5(3)] [326 IAC 2-2.4-14] [326 IAC 2-3.4-14]**

- (a) The Permittee shall submit a semi-annual report, containing the information described below, to the address listed in Section C – General Reporting Requirements, within thirty (30) days after the end of the calendar quarter being reported. This report requires the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). The report shall include the following information:
  - (1) The identification of the owner and operator of the source and the permit number.
  - (2) Total emissions of NO<sub>x</sub>, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.4.
  - (2) Total emissions of SO<sub>2</sub>, in tons per rolling 12 month period for each month in the reporting period, as determined by Condition E.1.5.
  - (3) All data relied upon, including but not limited to, any quality assurance or quality control data, in determining emissions.
  - (4) A list of any emissions units modified or added to the major stationary source during the reporting period.
  - (5) If not previously reported pursuant to another condition in this permit, the number, duration, and cause of any deviations or monitoring malfunctions, and any corrective action taken.
- (b) The procedures for reporting deviations from the requirements of this Section E, and the procedures for reporting emissions in excess of the limit in Condition E.1.1 are described in Condition B.15 (Deviation from Permit Requirements and Conditions). A report that describes emissions exceeding the PAL limit shall include the quantity of emissions emitted by the source. This term satisfies the requirements of 326 IAC 2-2.4-14(c).

**Conclusion and Recommendation**

The operation of this source shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 019-21450-00008. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

## Appendix A

### Baseline Actual Emissions and Proposed PAL Limits for NO<sub>x</sub>

The ESSROC Cement Corporation, Speed plant (“ESSROC”) is a stationary source that manufactures Portland cement. Portland cement is a fine powder, gray or white in color that consists of a mixture of hydraulic cement materials including calcium silicates, aluminates and aluminoferrites. Those materials are chemically combined through pyroprocessing (typically in a kiln) and subjected to mechanical processing operations to form gray and white Portland cement. Portland cement accounts for greater than 90% of the hydraulic cement produced in the United States.

As explained in the corresponding Technical Support Document (TSD), to which this document is an appendix, ESSROC applied for a Plantwide Applicability Limit for NO<sub>x</sub> pursuant to 326 IAC 2-2.4. The development of the PAL and the contributing baseline actual emissions are delineated in this document.

#### Emissions units

The primary sources of NO<sub>x</sub> emissions at this source are the #1 and #2 cement kilns (identified as EU20 and EU27, respectively). NO<sub>x</sub> emissions are generated from the oxidization of fuel-bound nitrogen during pyroprocessing. Kiln #1 (EU20) exhausts to stack S-14 and kiln #2 (EU27) exhausts to stack S-15 and bypass stack S-16.

Additional sources of NO<sub>x</sub> emissions at this source include two (2) fuel-oil fired air heaters for kiln #1 and kiln #2 (identified as EU68 and EU69, respectively), one (1) Todd furnace (identified as EU13) and various insignificant combustion units. NO<sub>x</sub> emissions from these units are generated from the oxidization of nitrogen and sulfur compounds in the fuel they consume. Emissions from air heater #1 (EU68) exhaust to the kiln #1 stack, S-14. Emissions from air heater #2 (EU69) exhaust to the kiln #2 stack, S-15. Emissions from the Todd Furnace (EU13) exhaust to the kiln #2 stack, S-15.

Pursuant to 326 IAC 2-2.4-3(1), ESSROC must list all emissions units at the source with a designation of whether the emission unit is small, significant, or major – based on the potential to emit of the emission unit. Small emission units are units with potential to emit less than PSD significant thresholds. For both NO<sub>x</sub>, this value is 40 tons per year. Therefore, any emission unit with potential to emit less than 40 tons per year of NO<sub>x</sub> is considered a small emission unit. Significant emission units are units with potential to emit equal to or greater than PSD significant thresholds, but less than 100 tons per year. Therefore, any emission unit with the potential to emit NO<sub>x</sub> of at least 40 tons per year and less than 100 tons per year is considered a significant emission unit. Major emission units are units with potential to emit equal to or greater than 100 tons per year of the respective pollutant.

In addition, 326 IAC 2-2.4 requires identification of all applicable requirements that apply to each emission unit used to develop the PAL. Such requirements are included in the Part 70 permit.

The TSD describes the emissions units as they are listed in the existing Part 70 permit for ESSROC. Only the emission units at the site with the potential to emit NO<sub>x</sub> are involved in this PAL and discussed in this document.

The following table lists the emission units with the potential to emit NO<sub>x</sub>:

**Table 1: Source Emissions Units**

Emission Unit ID	PAL Unit classification	Stacks	Applicable Requirements
Kiln #1 (EU20)	Major	S-14	See Section D.3

Emission Unit ID	PAL Unit classification	Stacks	Applicable Requirements and Section E of permit
Kiln #2 (EU27)	Major	S-15/ S-16	
Todd Furnace (EU13)	Significant	S-15/ S-16	
Air heater #1 (EU68)	Major	S-14	
Air heater #2 (EU69)	Small	S-15/ S-16	

### Baseline Actual Emissions

Under the PAL rules in 326 IAC 2-2.4-6, the PAL emission limit is equal to the sum of the baseline actual emissions rate for each PAL pollutant and an amount equal to the significant emission rate for the pollutant.

Baseline actual emissions are defined in 326 IAC 2-2-1(e) as the average actual emissions from any 24 month period of the last 10 years. It includes downward adjustments for noncompliant emissions that may have occurred during the baseline period and for new applicable requirements that apply to emission units since the time of the baseline period.

The baseline actual emissions are expressed by the following equation:

**Baseline actual emissions = Average actual emissions from any 24 month period of last 10 years [includes fugitive emissions, and SSM event emissions]**

- any noncompliant emissions that occurred during the 24 month period
- adjustment for applicability of new requirements since baseline period

### Baseline period

ESSROC proposed a NO<sub>x</sub> baseline period of the 24 month period beginning August 1, 1995 and ending July 31, 1997.

### Average actual emissions

As described above, the starting point for the baseline actual emissions are the average actual emissions of the PAL pollutant during the proposed baseline period. These emission levels are then adjusted downward to reflect any non-compliant emissions or the applicability of new emission limits or other requirements for the facilities.

To determine the average actual emissions for NO<sub>x</sub>, IDEM evaluated several sources of information. Specifically, IDEM considered actual emissions information:

- (1) Reported using the i-STEPS program. This program takes into account the amounts and characteristics of the raw materials, cement product and fuel consumed during the respective reporting period. Information about this program is available at: <http://www.in.gov/idem/air/programs/emissions/emissprog/index.html>

- (2) Resulting from process evaluation and testing completed in 2001.
- (3) Collected from CEMS data collected over the 2003 and 2004 calendar years. The CEMS recorded NO<sub>x</sub> emissions from stack S-14.
- (4) Developed from a 1996 Heat Balance evaluation of units exhausting to stacks S-15 and S-16. This evaluation was completed following a modification of Kiln #2 to equip it with a direct-firing system.

Since all NO<sub>x</sub> emissions are exhausted through either stack S-14 (i.e. the kiln #1 system) or stacks S-15/S-16 (i.e. the kiln #2 system), the emission information obtained from the aforementioned sources is organized accordingly in the following tables:

**Table 2: Emissions Data for the Kiln #1 system**

Information source	Year or Timeframe	Reported Actual Emissions (tpy)	Emission Rate (lb/hr)
i-STEPS	1995	1,605	413.2
i-STEPS	1996	2,007	512.9
i-STEPS	2 year avg.	-	463.0
Process Test	2001	-	307.7
CEMS	1/1/03 – 12/31/04	-	267.7

**Table 3: Emissions Data for the Kiln #2 system**

Information source	Timeframe	Reported Actual Emissions (tpy)	Emission Rate (lb/hr)
i-STEPS	1995	2,265	658.9
i-STEPS	1996	2,255	648.9
i-STEPS	2 year avg.	-	653.9
Heat Balance	1996	-	553.8
326 IAC 10-3	-	-	462 *

\* Pursuant to 326 IAC 10-3, the allowable SO<sub>2</sub> emissions from the kiln #2 system shall not exceed 462 lb/hr.

**Table 4: Operating Hours over baseline period**

Timeframe	Kiln #1 system Operating Hours (hr/yr)	Kiln #2 system Operating Hours (hr/yr)
8/1/95 – 7/31/96	7,886	7,076
8/1/96 – 7/31/97	7,606	6,734

The most conservative NO<sub>x</sub> emission rate provided by ESSROC for the kiln #1 system is from the 2003 and 2004 CEMS data. The kiln #1 system has not undergone any process changes since the CEMS data was collected (1/1/03 – 12/31/04). Therefore, the short term (lb NO<sub>x</sub> per hr) emission rate from CEMS data combined with the operating hours over the baseline period results in a reasonable and representative estimate of the NO<sub>x</sub> emissions from the kiln #1 system.

The most conservative NO<sub>x</sub> emission rate provided by ESSROC for the kiln #2 system is the allowable emission rate pursuant to 326 IAC 10-3. However, in 1997, the kiln #2 system was modified from a direct firing system to an indirect firing system in order to comply with the requirements of 326 IAC 10-3. Therefore, the 1996 Heat Balance rate must be adjusted to account for the impact of 326 IAC 10-3 before it can be compared to the allowable emission rate pursuant to 326 IAC 10-3.

Pursuant to 326 IAC 10-3-3(a)(3), the kiln #2 system shall not operate during the ozone season unless a 30% reduction in baseline emissions are achieved. Therefore, the 1996 Heat Balance emission rate is adjusted as follows:

$$\frac{[(547 \text{ lb/hr} \times 7 \text{ non-ozone season months}) + (547 \text{ lb/hr} \times 0.7 \times 5 \text{ ozone season months})]}{12 \text{ months}} = 478.6 \text{ lb/hr NO}_x$$

The adjusted emission rate from the 1996 Heat Balance is greater than the allowable emission rate pursuant to 326 IAC 10-3. Therefore, the allowable short term emission rate (lb NO<sub>x</sub> per hr) from 326 IAC 10-3 combined with the operating hours over the baseline period are a reasonable and representative estimate of the NO<sub>x</sub> emissions from the kiln #2 system.

As a result, the actual NO<sub>x</sub> emissions are calculated as follows:

August 1, 1995 – July 31, 1996:

$$267.7 \text{ lb/hr [short term emission rate from CEMS data for kiln \#1 system]} \times 7,886 \text{ hr/yr [operating hours over first 12 months of baseline period]} \times 1/2000 \text{ ton/lb} = 1,055.5 \text{ tons NO}_x \text{ per year}$$

$$462 \text{ lb/hr [short term emission rate for kiln \#2 system pursuant to 326 IAC 10-3]} \times 7,076 \text{ hr/yr [operating hours over first 12 months of baseline period]} \times 1/2000 \text{ ton/lb} = 1,634.5 \text{ tons NO}_x \text{ per year}$$

August 1, 1996 – July 31, 1997:

$$267.7 \text{ lb/hr [short term emission rate from CEMS data for kiln \#1 system]} \times 7,606 \text{ hr/yr [operating hours over second 12 months of baseline period]} \times 1/2000 \text{ ton/lb} = 1,018 \text{ tons NO}_x \text{ per year}$$

$$462 \text{ lb/hr [short term emission rate for kiln \#2 system pursuant to 326 IAC 10-3]} \times 6,734 \text{ hr/yr [operating hours over second 12 months of baseline period]} \times 1/2000 \text{ ton/lb} = 1,555.5 \text{ tons NO}_x \text{ per year}$$

Actual NO<sub>x</sub> emissions for August 1, 1995 – July 31, 1996:  
1055.5 + 1634.5 = 2690 tons of NO<sub>x</sub> per year

Actual NO<sub>x</sub> emissions for August 1, 1996 – July 31, 1997:  
1018.5 + 1555.5 = 2574 tons of NO<sub>x</sub> per year

Baseline Actual Emissions = (2690 + 2574)/2 = 2,632 tons of NO<sub>x</sub> per year.

#### **Adjustments due to noncompliant NO<sub>x</sub> emissions over the baseline period**

According to IDEM records, ESSROC did report any noncompliant NO<sub>x</sub> emissions over the baseline period. Therefore, adjustments to the average actual emissions from noncompliant emissions are not necessary.

**Adjustments due to new requirements imposed since the baseline period**

As discussed above, 326 IAC 10-3 became effective after the baseline period. However, the emission rates used to determine the baseline actual emissions already account for the respective requirements.

**Establishment of the PAL**

As a result, the following table presents the PAL emission level provided by this significant permit modification:

Baseline Actual Emissions (tpy NOx)	2632
Adjustment for non compliant emissions (tpy NOx)	- 0.0
Adjustment for new limitations (tpy NOx)	- 0.0
NSR significance level (tpy NOx)	+ 40.0
<b>Plantwide Applicability Limit (tpy NOx)</b>	<b>2,672</b>

## Appendix B

### Baseline Actual Emissions and Proposed PAL Limits for SO<sub>2</sub>

The ESSROC Cement Corporation, Speed plant (“ESSROC”) is a stationary source that manufactures Portland cement. Portland cement is a fine powder, gray or white in color that consists of a mixture of hydraulic cement materials including calcium silicates, aluminates and aluminoferrites. Those materials are chemically combined through pyroprocessing (typically in a kiln) and subjected to mechanical processing operations to form gray and white Portland cement. Portland cement accounts for greater than 90% of the hydraulic cement produced in the United States.

As explained in the corresponding Technical Support Document (TSD), to which this document is an appendix, ESSROC applied for a Plantwide Applicability Limit for SO<sub>2</sub> pursuant to 326 IAC 2-2.4. The development of the PAL and the contributing baseline actual emissions are delineated in this document.

#### Emissions units

The primary sources of SO<sub>2</sub> emissions at this source are the #1 and #2 cement kilns (identified as EU20 and EU27, respectively). SO<sub>2</sub> emissions are generated from the oxidization of sulfur compounds in the raw materials and fuel during pyroprocessing. Kiln #1 (EU20) exhausts to stack S-14 and kiln #2 (EU27) exhausts to stack S-15 and bypass stack S-16.

Additional sources of SO<sub>2</sub> emissions at this source include two (2) fuel-oil fired air heaters for kiln #1 and kiln #2 (identified as EU68 and EU69, respectively), one (1) Todd furnace (identified as EU13) and various insignificant combustion units. SO<sub>2</sub> emissions from these units are generated from the oxidization of sulfur compounds in the fuel they consume. Emissions from air heater #1 (EU68) exhaust to the kiln #1 stack, S-14. Emissions from air heater #2 (EU69) exhaust to the kiln #2 stack, S-15. Emissions from the Todd Furnace (EU13) exhaust to the kiln #2 stack, S-15.

Pursuant to 326 IAC 2-2.4-3(1), ESSROC must list all emissions units at the source with a designation of whether the emission unit is small, significant, or major – based on the potential to emit of the emission unit. Small emission units are units with potential to emit less than PSD significant thresholds. For SO<sub>2</sub>, this value is 40 tons per year. Therefore, any emission unit with potential to emit less than 40 tons per year of SO<sub>2</sub> is considered a small emission unit. Significant emission units are units with potential to emit equal to or greater than PSD significant thresholds, but less than 100 tons per year. Therefore, any emission unit with the potential to emit SO<sub>2</sub> of at least 40 tons per year and less than 100 tons per year is considered a significant emission unit. Major emission units are units with potential to emit equal to or greater than 100 tons per year of the respective pollutant.

In addition, 326 IAC 2-2.4 requires identification of all applicable requirements that apply to each emission unit used to develop the PAL. Such requirements are included in the Part 70 permit.

The TSD describes the emissions units as they are listed in the existing Part 70 permit for ESSROC. Only the emission units at the site with the potential to emit SO<sub>2</sub> are involved in this PAL and discussed in this document.

The following table lists the emission units with the potential to emit SO<sub>2</sub>:

**Table 1: Source Emissions Units**

Emission Unit ID	PAL Unit classification	Stacks	Applicable Requirements
Kiln #1 (EU20)	Major	S-14	See Section D.3

Emission Unit ID	PAL Unit classification	Stacks	Applicable Requirements
Kiln #2 (EU27)	Major	S-15/ S-16	and Section E of permit
Todd Furnace (EU13)	Major	S-15/ S-16	
Air heater #1 (EU68)	Major	S-14	
Air heater #2 (EU69)	Small	S-15/ S-16	

**Baseline Actual Emissions/Proposed PAL limit**

Under the PAL rules in 326 IAC 2-2.4-6, the PAL emission limit is equal to the sum of the baseline actual emissions rate for each PAL pollutant and an amount equal to the significant emission rate for the pollutant.

Baseline actual emissions are defined in 326 IAC 2-2-1(e) as the average actual emissions from any 24 month period of the last 10 years. It includes downward adjustments for noncompliant emissions that may have occurred during the baseline period and for new applicable requirements that apply to emission units since the time of the baseline period.

The baseline actual emissions are expressed by the following equation:

$$\text{Baseline actual emissions} = \text{Average actual emissions from any 24 month period of last 10 years} \text{ [includes fugitive emissions, and SSM event emissions]}$$

- any noncompliant emissions that occurred during the 24 month period
- adjustment for applicability of new requirements since baseline period

**Baseline period**

ESSROC proposed a SO<sub>2</sub> baseline period of the 24 month period beginning August 1, 1995 and ending July 31, 1997.

**Average actual emissions**

As described above, the starting point for the baseline actual emissions are the average actual emissions of the PAL pollutant during the proposed baseline period. These emission levels are then adjusted downward to reflect any non-compliant emissions or the applicability of new emission limits or other requirements for the facilities.

To determine the average actual emissions for SO<sub>2</sub>, IDEM evaluated several sources of information. Specifically, IDEM considered actual emissions information:

- (1) Reported using the i-STEPS program. This program takes into account the amounts and characteristics of the raw materials, cement product and fuel consumed during the respective reporting period. Information about this program is available at: <http://www.in.gov/idem/air/programs/emissions/emissprog/index.html>

- (2) Resulting from process evaluation and testing completed in 2001 on the kiln #1 system. No modifications to the kiln #1 system have been performed since that time.
- (3) Developed from a 1996 Heat Balance evaluation of units exhausting to stacks S-15 and S-16. This evaluation was completed following a modification of kiln #2 to equip it with an indirect-firing/low NOx burner system. The introduction of the indirect-fired system did not change the SO2 emissions from kiln #2. No modifications to the kiln #2 system have been performed since that time.

Since all SO2 emissions are exhausted through either stack S-14 (i.e. the kiln #1 system) or stacks S-15/S-16 (i.e. the kiln #2 system), the emission information obtained from the aforementioned sources is organized accordingly in the following tables:

**Table 2: SO2 Emissions Data for the Kiln #1 system**

Information source	Year	Reported Actual Emissions (tpy)	Emission Rate (lb/hr)
i-STEPS	1995	2,610	671.9
i-STEPS	1996	2,383	609.0
i-STEPS	2 year avg.	-	640.4
Process Test	2001	-	630.4

**Table 3: Emissions Data for the Kiln #2 system**

Information source	Year	Reported Actual Emissions (tpy)	Emission Rate (lb/hr)
i-STEPS	1995	6,875	343.3
i-STEPS	1996	6,950	327.5
i-STEPS	2 year avg.	-	335.4
Heat Balance	1996	-	456.5

**Table 4: Operating Hours over baseline period**

Timeframe	Kiln #1 system Operating Hours (hr/yr)	Kiln #2 system Operating Hours (hr/yr)
8/1/95 – 7/31/96	7,886	7,076
8/1/96 – 7/31/97	7,606	6,734

The most conservative SO2 emission rate provided by ESSROC for the kiln #1 system is from the 2001 Process test. Therefore, the short term (lb SO2 per hr) emission rate from the 2001 Process Test combined with the operating hours over the baseline period results in a reasonable and representative estimate of the SO2 emissions from the kiln #1 system.

In 1995 and 1996, the facility utilized the only information available at the time for reporting its SO2 emissions from the kiln #2 system; i-STEPS. AP-42 emission factors are used as part of the i-STEPS program. However, the emissions estimate completed by i-STEPS for the kiln #2 system significantly underestimates the SO2 emissions from a preheater kiln that processes raw materials with relatively high levels of pyrite (FeS). The AP-42 SO2 emission factor for a preheater type kiln (like kiln #2) assumes a low level of pyrite in the raw materials and factors in the natural scrubbing efficiency of the preheat tower

and in-line raw mill. SO<sub>2</sub> emissions generated from the oxidization of pyrite, which volatilizes at the top of the preheat tower, do not have the opportunity to react with free lime within the preheat tower. Consequently, the presence of pyrites in the raw material increase sulfur oxide emissions. ESSROC's quarry material contains high levels of pyrite so the i-STEPS SO<sub>2</sub> estimates are unrepresentative of the emissions from kiln #2.

The 1996 Heat Balance evaluation of the kiln #2 system was completed to characterize the emissions from the kiln #2 system. The kiln #2 system has not undergone any process changes since the baseline period (8/1/95 – 7/31/97). Therefore, the short term (lb SO<sub>2</sub> per hr) emission rate from the 1996 Heat Balance combined with the operating hours over the baseline period results in a reasonable and representative estimate of the SO<sub>2</sub> emissions from the kiln #2 system.

As a result, the actual SO<sub>2</sub> emissions are calculated as follows:

August 1, 1995 – July 31, 1996:

630.4 lb/hr [short term emission rate from 2001 Process Test on the kiln #1 system] x 7,886 hr/yr  
[operating hours over first 12 months of baseline period] x 1/2000 ton/lb =  
2,485.6 tons SO<sub>2</sub> per year

456.5 lb/hr [short term emission rate from 1996 Heat Balance on the kiln #2 system] x 7,076 hr/yr  
[operating hours over first 12 months of baseline period] x 1/2000 ton/lb =  
1,615.1 tons SO<sub>2</sub> per year

August 1, 1996 – July 31, 1997:

630.4 lb/hr [short term emission rate from 2001 Process Test on the kiln #1 system] x 7,606 hr/yr  
[operating hours over second 12 months of baseline period] x 1/2000 ton/lb =  
2,397.4 tons SO<sub>2</sub> per year

456.5 lb/hr [short term emission rate from 1996 Heat Balance on the kiln #2 system] x 6,734 hr/yr  
[operating hours over second 12 months of baseline period] x 1/2000 ton/lb =  
1,567.3 tons SO<sub>2</sub> per year

Actual SO<sub>2</sub> emissions from August 1, 1995 – July 31, 1996:  
2485.6 + 1615.1 = 4100.7 tons of SO<sub>2</sub> per year

Actual SO<sub>2</sub> emissions from August 1, 1996 – July 31, 1997:  
2,397.4 + 1567.3 = 3964.7 tons of SO<sub>2</sub> per year

Baseline Actual Emissions = (4100.7 + 3964.7)/2 = 4,032 tons of SO<sub>2</sub> per year.

#### **Adjustments due to noncompliant NO<sub>x</sub> emissions over the baseline period**

According to IDEM records, ESSROC did report any noncompliant SO<sub>2</sub> emissions over the baseline period. Therefore, adjustments to the average actual emissions from noncompliant emissions are not necessary.

#### **Adjustments due to new limitations imposed since the baseline period**

No new SO<sub>2</sub> emission limitations have been imposed since the baseline period.

### Establishment of the PAL

As a result, the following table presents the PAL emission level provided by this significant permit modification:

Baseline Actual Emissions (tpy SO <sub>2</sub> )	4,032
Adjustment for non compliant emissions (tpy SO <sub>2</sub> )	- 0.0
Adjustment for new limitations (tpy SO <sub>2</sub> )	- 0.0
NSR significance level (tpy SO <sub>2</sub> )	+ 40.0
<b>Plantwide Applicability Limit (tpy SO<sub>2</sub>)</b>	<b>4,072</b>