



*Mitchell E. Daniels, Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
(800) 451-6027  
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: December 31, 2007

RE: Mid-Continent Coal & Coke Company / 127-24404-05305

FROM: Matthew Stuckey, Deputy 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 13-15-5-3, this permit 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 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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 an initial Title V operating permit, permit renewal, 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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100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Mid-Continent Coal and Coke Company,  
an on-site contractor for ISG Burns Harbor  
U.S. Highway 12  
Burns Harbor, Indiana 46304  
(Portable)**

(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.: 127-24404-05305	
Original signed by:  Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 31, 2007  Expiration Date: December 31, 2012

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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, A.3 and A.4 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 portable coke fines screening plant.

Initial Source Address:	U.S. Highway 12, Burns Harbor, Indiana 46304
Mailing Address:	915 W. 175th Street, Homewood, Illinois 60430
General Source Phone Number:	(708) 798-1110
SIC Code:	5052
County Location:	Porter
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD and Emission Offset Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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This source consists of a source with on-site contractors:

- (1) ISG Burns Harbor, LLC (ID 00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana 46304;
- (2) Mid-Continent Coal and Coke Company (previously permitted under ID 05215), a supporting operation known as Plant 1, is located at U.S. Highway 12, Burns Harbor, Indiana 46304;
- (3) Mid-Continent Coal and Coke Company (previously permitted under ID 05222), a supporting operation known as Plant 2, is located at 1150 East Boundary Road, Portage, Indiana 46368;
- (4) Mid-Continent Coal and Coke Company (previously permitted under ID 00108), a supporting operation known as the Sump Plant, is located at U.S. Highway 12, Burns Harbor, Indiana 46304; and
- (5) Mid-Continent Coal and Coke Company (previously permitted under ID 05216), a supporting operation known as Plant 3, is located at 1150 East Boundary Road, Portage, Indiana 46368.
- (6) Mid-Continent Coal and Coke Company, a supporting operation known as MCCC Plant 4, to be located at U.S. Highway 12, Burns Harbor, Indiana 46304.

IDEM has determined that ISG Burns Harbor and MCCC Plants are under the common control of ISG Burns Harbor, and therefore, will be considered as one source, as defined by 326 IAC 2-7-1(22), based on this contractual control.

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

One (1) screening operation with a maximum capacity of fifty (50) tons per hour, and consisting of the following equipment:

- (a) One (1) coke screen;
- (b) Four (4) conveyors;
- (c) One (1) hopper;
- (d) One (1) internal combustion diesel generator, used to generate electric power, with a maximum capacity of 164 HP; and
- (e) One (1) front-end loader, consisting of an eight (8) cubic yard bucket, with a capacity equal to 4.5 tons per bucket.

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 source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

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

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

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) 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, T127-24404-05305, 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 of this permit.
- (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 the "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) The "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 April 15 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]

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

The PMP extension notification does 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 is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do 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, and Northwest Regional Office within four (4) daytime business hours after

the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone 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  
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

- (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.

- (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 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]

- (a) All terms and conditions of permits established prior to Part 70 Permit No. T127-24404-05305 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 "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.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 Operating 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  
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][40 CFR 72]**

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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  
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) 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)(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 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.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2-2 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 and/or 326 IAC 2-3 (for sources located in NA areas).

**B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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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, 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)][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, 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 Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 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] [IC 13-17-9]**

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

**C.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).

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on July 31, 2002. The plan is included as Attachment A.

**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 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **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 Permittee 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.

#### **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 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.12 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 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 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.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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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.14 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 (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; and/or
  - (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.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

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

- (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 "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-3(II) at a source with a Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 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/or 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)(iii); 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.17 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, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (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/or 326 IAC 2-3-1 (ll) 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) and/or 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 2-2-2(d)(3) and/or 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 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

### Portable Source Requirement

#### C.18 Relocation of Portable Sources [326 IAC 2-14-4]

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- (a) This permit is approved for operation all attainment areas for ozone in Indiana and in Porter County which is classified as severe nonattainment for ozone. This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2, and Emission Offset requirements in 326 IAC 2-3. Prior to locating in any other severe nonattainment area, the Permittee must submit a request and obtain a permit revision.
- (b) A request to relocate shall be submitted to IDEM, OAQ at least thirty (30) days prior to the intended date of relocation. This submittal shall include the following:
  - (1) A list of governmental officials entitled to receive notice of application to relocate. IC 13-15-3-1
  - (2) A list of adjacent landowners that the Permittee will send written notice to not more than ten (10) days after submission of the request to relocate. IC 13-15-8The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) "Relocation Site Approval" letter shall be obtained prior to relocating.
- (d) The Permittee shall also notify the applicable local air pollution control agency when relocating to, or from, one the following:
  - (1) Madison County - (Anderson Office of Air Management)

- (2) City of Evansville plus four (4) miles beyond the corporate limits but not outside Vanderburgh County - (Evansville EPA)
  - (3) City of Gary -(Gary Department of Environmental Affairs)
  - (4) City of Hammond - (Hammond Department of Environmental Management)
  - (5) Marion County - (Indianapolis Office of Environmental Services)
  - (6) Vigo County - (Vigo County Air Pollution Control)
- (e) A valid operation permit consists of this document and any subsequent "Relocation Site Approval" letter specifying the current location of the portable plant.

### **Stratospheric Ozone Protection**

#### **C.19 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 – Screening Operations

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

One (1) screening operation with a maximum capacity of fifty (50) tons per hour, and consisting of the following equipment:

- (a) One (1) coke screen;
- (b) Four (4) conveyors;
- (c) One (1) hopper;
- (d) One (1) internal combustion diesel generator, used to generate electric power, with a maximum capacity of 164 HP; and
- (e) One (1) front-end loader, consisting of an eight (8) cubic yard bucket, with a capacity equal to 4.5 tons per bucket.

(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 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the MCCC Plant 4 shall be limited to less than 44.6 pounds per hour when operating at a process weight rate of 50 tons per hour.

This limit was calculated using the following equation.

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

### Compliance Determination Requirements

#### D.1.3 PM and PM10 Emissions Requirements

The Permittee shall use wet suppression to control emissions of PM and PM10 from the coke screening operation, roads and storage piles as necessary to ensure that the coke processed has a moisture content greater than ten (10) percent. The suppressant shall be applied in a manner and at a frequency sufficient to ensure PM and PM10 emissions are less than twenty-five (25) and less than fifteen (15) tons per year, respectively. If weather conditions preclude the use of wet suppression, the Permittee shall perform moisture content analysis to verify the moisture content of the coke is equal to or greater than ten (10) percent. The method for the moisture content analysis shall be approved by IDEM, OAQ.

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

### **D.1.4 Visible Emissions Notations**

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- (a) Visible emission notations of the hopper, the screen, and the conveyor transfer points 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 observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

### **D.1.5 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.4, the Permittee shall maintain daily records of visible emission notations of the hoppers, the screen, and the conveyor transfer points. 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Mid-Continent Coal and Coke Company (MCCC Plant 4)  
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304  
Mailing Address: 915 W. 175th Street, Homewood, Illinois 60430  
Part 70 Permit No.: 127-24404-05305

**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: Mid-Continent Coal and Coke Company (MCCC Plant 4)  
Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304  
Mailing Address: 915 W. 175th Street, Homewood, Illinois 60430  
Part 70 Permit No.: 127-24404-05305

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- 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
  - 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.

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
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 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Mid-Continent Coal and Coke Company (MCCC Plant 4)  
 Source Address: U.S. Highway 12, Burns Harbor, Indiana 46304  
 Mailing Address: 915 W. 175th Street, Homewood, Illinois 60430  
 Part 70 Permit No.: 127-24404-05305

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

<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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<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>	
<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.

## Attachment A Fugitive Dust Control Plan

**MID-CONTINENT COAL AND COKE COMPANY  
915 WEST 175TH STREET  
HOMEWOOD, ILLINOIS 60430**

PREMIUM QUALITY  
COAL AND COKE

TELEPHONE (708) 798-1110  
FACSIMILE (708) 798-1299

FUGITIVE DUST CONTROL PLAN  
Part 70 Permit # 127-24404-05305

### Source Information

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#### Primary Contact & Owner Information

Carl Horst  
Manager of Operations  
Mid-Continent Coal and Coke Company  
915 W. 175<sup>th</sup> Street  
Homewood, IL 60430  
(708) 798-1110  
Off-hours Number (708) 267-7198

#### Portable Source Address

ISG Burns Harbor, L.L.C.  
U.S. Highway 12  
Burns Harbor, Indiana 46304

### Emission Sources and Methods of Fugitive Emissions Control

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#### Roadway Control

1. Traffic is restricted to established and controlled roadways.
2. Vehicular traffic (i.e., loaders, tractor trailers, trucks, etc.) on unpaved roads is limited to 5 mph.
3. Paved roadways are the responsibility of ISG Burns Harbor, L.L.C. or the Port of Indiana.
4. Unpaved roadways, within the portable plant work area, are inspected each day of operation to determine if dust suppression is required.
5. Water is applied to unpaved roads, by front-end loader bucket, to manage fugitive dust.

#### Coke/Coal Stockpile Control Measures

1. Front-end loader bucket drop height, during screening and loading operations, is kept to the lowest practical elevation.
2. Water is applied to stockpiles, as necessary, to prevent visible emissions from leaving the property.
3. Water will not be applied during freezing weather, typically between October 15 and April 15.

#### Coke/Coal Screening & Stacking Control

The inherent moisture of coke is greater than 10%. This prevents visible emissions during screening and stacking operations. If excess emissions are observed during screening or stacking, operations will stop and one of two control methods will be used:

1. Water sprays may be applied to the source stockpile to get its moisture level above 10%
2. For small amounts of dry coke, fresh material may be dumped on top of the dry material and mixed with a loader bucket to raise the moisture content of the dry material to an acceptable level.

**MID-CONTINENT COAL AND COKE COMPANY  
915 WEST 175TH STREET  
HOMEWOOD, ILLINOIS 60430**

PREMIUM QUALITY  
COAL AND COKE

TELEPHONE (708) 798-1110  
FACSIMILIE (708) 798-1299

**FUGITIVE DUST CONTROL PLAN  
Part 70 Permit # 127-24238-05305**

Site Map

Legend

Unpaved Roads - - - - -

Stockpile 

Portable Plant 

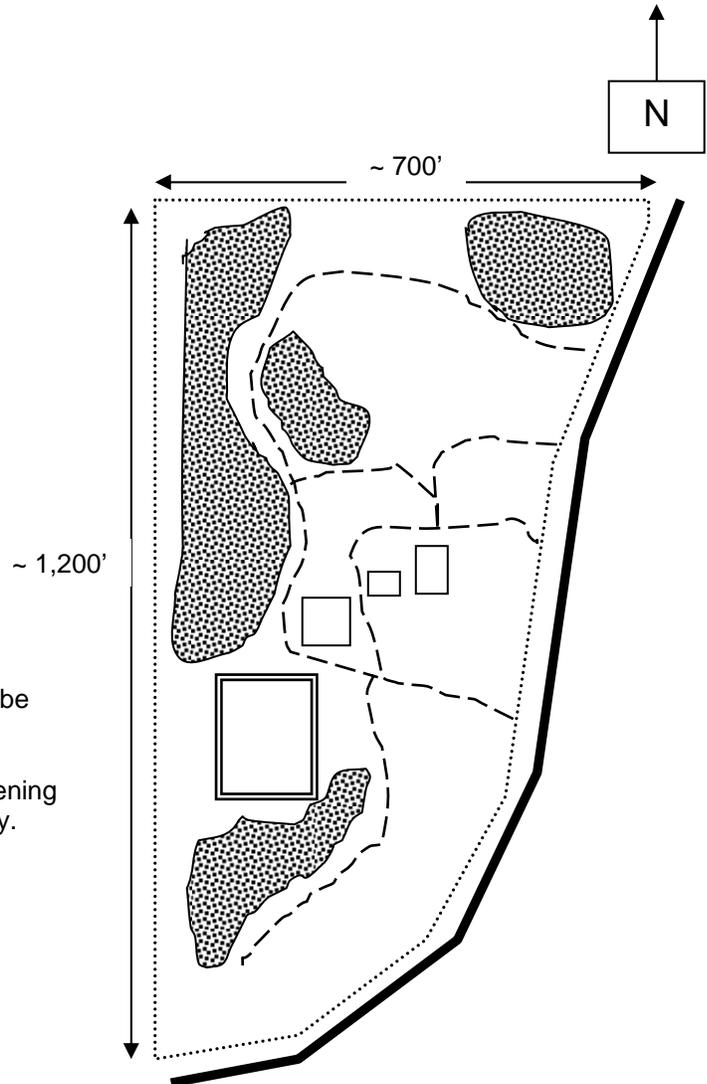
Property Line - · - · - ·

Buildings 

Paved Road 

Stacking Conveyor(s) are not indicated. They can be located anywhere within the property.

Note: Stockpiles and the exact location to the screening and stacking operations will vary within the property.



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

**Technical Support Document (TSD)  
for a Part 70 Operating Permit**

**Source Description and Location**

Source Name:	Mid-Continent Coal and Coke Company, an on-site contractor of ISG Burns Harbor, LLC.
Source Location:	U.S. Highway 12, Burns Harbor, Indiana 46304
County:	Porter
SIC Code:	5052
Significant Source Modification No.:	127-24238-05305
SSM Issuance Date	June 27, 2007
Part 70 Permit No.:	127-24404-05305
Permit Reviewer:	ERG/ST

**History**

IDEM, OAQ has reviewed the permit application from Mid-Continent Coal and Coke Company (MCCC Plant 4) submitted on January 19, 2007, relating to the construction and operation of a portable coke fines screening plant.

Operations at MCCC Plant 4 will relocate from 3001 Dickey Road, East Chicago to U.S. Highway 12, Burns Harbor, and will be collocated with ISG Burns Harbor (see Source Definition section for details).

In lieu of a Significant Permit Modification and for administrative purposes, a separate Part 70 Permit will be issued to MCCC Plant 4 at Burns Harbor location, as an on-site contractor for ISG Burns Harbor.

Upon issuance of the Part 70 Permit (No.: 127-24404-05305), the existing Part 70 Permit (No.: 089-21801-00507, issued December 15, 2006) for MCCC at the East Chicago location shall be revoked.

ISG Burns Harbor submitted an application for a Part 70 permit on July 22, 1996, which is currently pending. The scope of this project will not affect the capacity or throughput of any other operations at ISG Burns Harbor.

**Source Definition**

- (a) Mid-Continent Coal and Coke Company (MCCC) operates existing portable coke fines screening operations, as an on-site contractor for ISG Burns Harbor, LLC. ISG Burns Harbor, LLC (ID 00001), the primary operation, is located at U.S. Highway 12, Burns Harbor, Indiana 46304.
- (1) Mid-Continent Coal and Coke Company (previously permitted under ID 05215), a supporting operation known as Plant 1, is located at U.S. Highway 12, Burns Harbor, Indiana 46304;
- (2) Mid-Continent Coal and Coke Company (previously permitted under ID 05222), a supporting operation known as Plant 2, is located at 1150 East Boundary Road, Portage, Indiana 46368;

- (3) Mid-Continent Coal and Coke Company (previously permitted under ID 00108), a supporting operation known as the Sump Plant, is located at U.S. Highway 12, Burns Harbor, Indiana 46304; and
- (4) Mid-Continent Coal and Coke Company (previously permitted under ID 05216), a supporting operation known as Plant 3, is located at 1150 East Boundary Road, Portage, Indiana 46368.

A separate Part 70 permit will be issued to ISG Burns Harbor, LLC (TV 127-6301-00001). The existing MCCC plants listed above were issued a separate Part 70 Permit (TV 127-7634-00108) on June 30, 2006, solely for administrative purposes.

- (b) IDEM has determined that ISG Burns Harbor, LLC and MCCC Plant 4 are under the common control of ISG Burns Harbor, LLC., and therefore, they will be considered as one source, as defined by 326 IAC 2-7-1(22), based on this contractual control.
- (5) Mid-Continent Coal and Coke Company, a supporting operation known as MCCC Plant 4, will be located at U.S. Highway 12, Burns Harbor, Indiana 46304.

In lieu of a Significant Permit Modification and for administrative purposes, a separate Part 70 Operating Permit shall be issued to MCCC Plant 4 (127-24404-05305).

#### Existing Approvals

MCCC (henceforth known as MCCC Plant 4) has been operating under Part 70 Permit.: 089-21801-00507, issued on December 15, 2006. MCCC Plant 4 was issued Significant Source Modification 127-24238-05305 on June 27, 2007. Upon issuance of the Part 70 Permit No.: 127-24404-05305 (this permit) for the Burns Harbor location, the existing Part 70 Permit No.:089-21801-00507 for the East Chicago location shall be revoked. See the History section of this TSD for details.

#### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.
  - (1) On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve

the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for nonattainment new source review. See the State Rule Applicability for the source section.

- (2) VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter 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 Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Porter County as nonattainment for PM<sub>2.5</sub>. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (c) Porter County has been classified as attainment or unclassifiable in Indiana for SO<sub>2</sub>, CO, NO<sub>2</sub>, and Lead (Pb). Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

**Source Status - ISG Burns Harbor and Mid-Continent Coal and Coke Company Plant 4**

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

Pollutant	Emissions (tons/year)
PM	>100
PM <sub>10</sub>	>100
SO <sub>2</sub>	>100
VOC	>100
CO	>100
NO <sub>x</sub>	>100
Single HAP	>10
Combination of HAPs	>25

- (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 a nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAPs emissions are greater than ten (10) tons per year for any single HAP and greater than twenty-five (25) tons per year of a combination of HAPs.

### Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by MCCC Plant 4 on January 19, 2007 relating to the construction and operation of a portable coke fines screening plant. This source will function as an on-site contractor of ISG Burns Harbor, LLC. The following is a list of the proposed emissions units and pollution control devices:

One (1) screening operation with a maximum capacity of fifty (50) tons per hour, and consisting of the following equipment:

- (a) One (1) coke screen;
- (b) Four (4) conveyors;
- (c) One (1) hopper;
- (d) One (1) internal combustion diesel generator, used to generate electric power, with a maximum capacity of 164 HP; and
- (e) One (1) front-end loader, consisting of an eight (8) cubic yard bucket, with a capacity equal to 4.5 tons per bucket.

### Enforcement Issues

There are no pending enforcement actions.

### Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

### Permit Level Determination – Part 70

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

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	14.5
PM10	6.54
SO <sub>2</sub>	1.47
VOC	1.81
CO	4.80
NO <sub>x</sub>	22.3
Single HAP	Negligible
Total HAPs	Negligible

There are no HAP emissions from the new emission units, except from diesel fired units which are considered as negligible.

In lieu of a Significant Permit Modification and for administrative purposes, a separate Part 70 Operating Permit shall be issued to MCCC Plant 4, an on-site contractor of ISG Burns Harbor.

**Permit Level Determination – PSD or Emission Offset**

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Unit	Potential to Emit (tons/year)						
	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Storage Piles	1.04	1.04	0	0	0	0	0
Transporting (Unpaved Roads)	4.91	1.25	0	0	0	0	0
Coke Handling	0.40	0.19					
Coke Processing	0.60	0.20					
Internal Combustion Engine (164 HP)	1.58	1.58	1.47	1.81	4.80	22.3	0
<b>Total Emissions From Portable Plant (MCCC 4)</b>	<b>8.53</b>	<b>4.26</b>	<b>1.47</b>	<b>1.81</b>	<b>4.80</b>	<b>22.3</b>	<b>0</b>
PSD/Emission Offset Thresholds	25	15	40	40	100	40	NA

- (a) This modification to an existing major stationary source is not major because the emissions increase for each criteria pollutant is less than the PSD and Emission Offset significant levels. Therefore, the provisions of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) do not apply.
- (b) Porter County has been designated as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10. MCCC Plant 4 has a potential to emit of PM10 from the modification of less than fifteen (15) tons per year. Therefore, the provisions of 326 IAC 2-1.1-5 (Nonattainment NSR) do not apply.

IDEM also considered other modifications performed at this source in the last year to determine if they were part of the same project and should be considered collectively for determining the PSD status of this project. The modifications and their status in regards to this current project are as follows:

Source Modification Permit No.	Date of Issuance	Reason for Modification
SSM 127-24646-00108	On Public Notice Till 11/2/07	This modification adds equipment that was used during an emergency situation (blast furnace shutdown). Generators and a stacking conveyor were added to stack surplus coke produced by the coke ovens. Without this mod, the source would have run out of coke storage space.
MSM 127-23580-00108	9/20/06	This modification added four stacking conveyors to the permit's equipment list to correct a mistake. These conveyors were onsite and operational at the time the permit was issued, but they were not listed in the permit.
MSM 127-24351-05305	3/27/07	This modification to the ISG Burns Harbor, LLC permit added an iron ore pellet crusher and associated conveyors. The TSD for this modification states that this project will not affect the capacity or throughput of any other operations at ISG Burns Harbor LLC.
SSM 127-24238-05305	6/27/07	This modification relocated existing portable coke screening and conveying operations to the ISG Burns Harbor site.

IDEM has determined that the modifications performed under SSM 127-24646-00108, MSM 127-23580-00108, and MSM 127-24351-05305 are not a part of the modification performed under SSM 127-24238-05305.

#### **Federal Rule Applicability Determination**

- (a) There are no New Source Performance Standards (NSPS), 326 IAC 12 and 40 CFR Part 60 included in this permit for MCCC Plant 4.
- (b) The requirements of the New Source Performance Standard (NSPS), 40 CFR 60.670 through 60.676, Subpart OOO -Standards of Performance for Nonmetallic Mineral Processing Plants (326 IAC 12) are not included in this permit for MCCC Plant 4 since the coke is not a nonmetallic mineral pursuant to 40 CFR 60.671.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) included in this permit for MCCC Plant 4.
- (d) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit because this permit does not involve a pollutant-specific emissions unit as defined in 40 CFR 64:
  - (1) with the potential to emit before controls equal to or greater than the major source threshold,
  - (2) that is subject to an emission limitation or standard, and
  - (3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

#### **Relocation of Portable Sources**

- (a) This permit is approved for operation in Indiana. This determination is based on the requirements of Prevention of Significant Deterioration in 326 IAC 2-2, and Emission Offset requirements in 326 IAC 2-3. Prior to locating in any other nonattainment area, the Permittee must submit a request and obtain a permit modification.
- (b) A request to relocate shall be submitted to IDEM, OAQ at least thirty (30) days prior to the intended date of relocation. This submittal shall include the following:
  - (1) A list of governmental officials entitled to receive notice of application to relocate. [IC 13-15-3-1]
  - (2) A list of adjacent landowners that the Permittee will send written notice to not more than ten (10) days after submission of the request to relocate. IC 13-15-8 The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) "Relocation Site Approval" letter shall be obtained prior to relocating.
- (d) The Permittee shall also notify the applicable local air pollution control agency when relocating to, or from, one the following:
  - (1) Madison County - (Anderson Office of Air Management)
  - (2) City of Evansville plus four (4) miles beyond the corporate limits but not outside Vanderburgh County - (Evansville EPA)

- (3) City of Gary -(Gary Department of Environmental Affairs)
- (4) City of Hammond - (Hammond Department of Environmental Management)
- (5) Marion County - (Indianapolis Office of Environmental Services)
- (6) Vigo County - (Vigo County Air Pollution Control)
- (e) A valid operation permit consists of this document and any subsequent "Relocation Site Approval" letter specifying the current location of the portable plant.

<b>State Rule Applicability Determination</b>
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The following state rules are applicable to the source due to the modification:

326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment NSR)  
MCCC Plant 4 will function as a contractor for ISG Burns Harbor, LLC and is considered as one source due to this contractual control. It is in one of the 28 listed source categories, and it is a major source under 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset).

- (a) Porter County has been designated as nonattainment for PM 2.5 (see Permit Level Determination section). IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM 2.5 NAAQS. MCCC Plant 4 has a potential to emit of PM10 of less than 15 tons per year. Therefore, the requirements of 326 IAC 2-1.1-5 (Nonattainment NSR) do not apply.
- (b) Porter County has been designated as attainment for CO and SO<sub>2</sub>. The potential to emit of CO and SO<sub>2</sub> from the coke fines screening plant is less than one hundred (100) tons per year. Therefore, the coke fines screening operation is not subject to the provisions of 326 IAC 2-2 (PSD).
- (c) Porter County has been designated as nonattainment for Ozone under the 8-hour Ozone standard. Therefore, VOC and NO<sub>x</sub> emissions were evaluated under the provisions of 326 IAC 2-3 (Emission Offset) as described below:

At its maximum operating capacity, the potential VOC and NO<sub>x</sub> emissions from the coke fines screening plant are less than forty (40) tons per year, respectively. Therefore, the coke fines screening operation is not subject to the provisions of 326 IAC 2-2 (PSD) or 326 IAC 2-3 (Emissions Offset).

The de minimus test for VOC does not apply since VOC will be emitted from the coke fines screening plant at less than fifteen (15) pounds per day. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

See the *Permit Level Determination – PSD or Emission Offset* section above for further discussion of the PSD issues pertaining to this modification.

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

The operation of this portable coke fines screening plant will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the requirements of 326 IAC 2-4.1 do not apply to this modification.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program, and it is located in Porter County. Pursuant to this rule, 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. The provisions of 326 IAC 2-6 shall be included in the Part 70 Permit No.: 127-24404-05305.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4-2 (Fugitive Dust Emissions)

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.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This source is subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it is a new source of particulate matter as described in 326 IAC 6-5-1(b). Pursuant to this rule, the Permittee shall control fugitive particulate matter emissions according to the Fugitive Dust Control Plan, submitted on July 31, 2002. This plan indicates that the fugitive emissions will be controlled by spraying the unpaved roads and storage piles with water on an as-needed basis. A copy of the Fugitive Dust Control Plan is included in the permit as Attachment A.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

The coke fines screening plant is not subject to the provisions of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations) because the coke fines screening plant has potential to emit of SO<sub>2</sub> less than twenty-five (25) tons per year.

326 IAC 8-1-6 (New Facilities; General Reduction Requirement)

The coke fines screening plant does not have potential VOC emissions equal to or greater than twenty five (25) tons per year. Therefore this source is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements).

326 IAC 9 (Carbon Monoxide Emission Limitations)

There are no specific emission limitations required by this rule because the source is not an operation listed in 326 IAC 9-1-2.

326 IAC 10 (Nitrogen Oxide Emission Limitations)

This source is located in Porter County. Therefore, the provisions of 326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd Counties) do not apply.

326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Processes)

The Permittee is subject to the requirements of 326 IAC 6-3 because the coke fines screening plant is located in Porter County, which is not covered by the provisions of 326 IAC 6.8 or 326 IAC 6.5 as described in 326 IAC 6-3-1(c)(3). Therefore, pursuant to 326 IAC 6-3-2, the particulate emissions from the MCCC Plant 4 shall be limited to less than 44.6 pounds per hour when operating at a process weight rate of 50 tons per hour.

This limit was calculated using the following equation.

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where  $E$  = rate of emission in pounds per hour and  
 $P$  = process weight rate in tons per hour

326 IAC 6-2-1 (Particulate Matter Emissions Limitations for Sources of Indirect Heating)

The diesel generator is a type of internal combustion engine in which the fuel is ignited by being suddenly exposed to the high temperature and pressure of the compressed gas. The Permittee uses the engine to power their plant. This is not a steam generator or indirect heating unit. Therefore, the provisions of 326 IAC 6-2-1 are not applicable.

<b>Compliance Determination and Monitoring Requirements</b>
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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 following compliance determination and monitoring requirements are applicable to this source:

- (a) The Permittee shall use wet suppression to control emissions of PM and PM10 from the coke screening operation, roads and storage piles as necessary to ensure that the coke processed has a moisture content greater than ten (10) percent. The suppressant shall be applied in a manner and at a frequency sufficient to ensure PM and PM10 emissions are less than twenty-five (25) and less than fifteen (15) tons per year, respectively. If weather conditions preclude the use of wet suppression, the Permittee shall perform moisture content analysis to verify the moisture content of the coke is equal to or greater than ten (10) percent. The method for the moisture content analysis shall be approved by IDEM, OAQ.
- (b) Visible emission notations of the hoppers, the screens, and the conveyor transfer points 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.
- (c) 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.
- (d) 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.
- (e) 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.

- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

<b>Conclusion and Recommendation</b>
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The operation of this proposed modification (portable coke fines screening plant) shall be subject to the conditions of the attached proposed Title V permit No. T127-24404-05305.

**Appendix A: Emission Calculations  
PM/PM10 Emissions from Coke Processing**

Company Name: Mid-Continent Coal and Coke Company  
 Address: 3001 Dickey Road, East Chicago, Indiana 46312  
 Title V: 089-24404-05305  
 Reviewer: ERG/ST  
 Date: September 19, 2007

**Coke Processing Operations (Uncontrolled)**

Activity	Maximum Capacity (tons/year)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	Uncontrolled PTE of PM (tons/year)	Uncontrolled PTE of PM10 (tons/year)
Screening (SCC 3-05-020-02, 03)	438,000	0.0022	0.00074	0.48	0.16
Conveying (4 points) (SCC 3-05-020-06)	438,000	0.00014	0.000046	0.12	0.04
<b>Totals</b>				<b>0.60</b>	<b>0.20</b>

Coke is quenched in water after removal from coke ovens. The coke is then delivered directly to MCCC's screening facility. The raw coke is high moisture (10 % or greater) when it arrives onsite. Therefore, high moisture emission factors (greater than 1.3% moisture) are used to determine uncontrolled PTE.

**Coke Processing Operations (Controlled)**

Activity	Maximum Capacity (tons/year)	PM Emission Factor (lb/ton)	PM10 Emission Factor (lb/ton)	Controlled PTE of PM (tons/year)	Controlled PTE of PM10 (tons/year)
Screening (SCC 3-05-020-02, 03)	438,000	0.0022	0.00074	0.48	0.16
Conveying (4 points) (SCC 3-05-020-06)	438,000	0.00014	0.000046	0.12	0.04
<b>Totals</b>				<b>0.60</b>	<b>0.20</b>

In the controlled scenario, water spray is applied to the coke prior to screening, and to storage piles prior to loading.

The source wets the coke to control PM/PM10 emissions.

Emission factors for screening and conveying high moisture ore (controlled) are from AP 42, Chapter 11.19.2, Table 11.19.2-2

**METHODOLOGY**

Uncontrolled PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/year) \* PM/PM10 Emission Factor (lb/ton) \* 1 ton/2000 lbs

Controlled PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/year) \* PM/PM10 Emission Factor (lb/ton) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**PM & PM10 Emissions from Storage Piles, Coke Handling, and Unpaved Roads**

Company Name: Mid-Continent Coal and Coke Company  
 Address: 3001 Dickey Road, East Chicago, Indiana 46312  
 Title V: 089-24404-05305  
 Reviewer: ERG/ST  
 Date: September 19, 2007

**1. Fugitive Emissions from Coke Storage Piles**

Storage pile emissions, which result from wind erosion, are determined by the following calculations:

$$E_f = 1.7 (s/1.5) * (365-p) / 235 * (f/15)$$

$$= 5.67 \text{ lb/ac/day}$$

where:	s =	4.9	% silt content of material
	p =	125	days of rain greater than or equal to 0.01 inches
	f =	15	% of wind greater than or equal to 12 mph

$$\text{Storage capacity (SC) of site (tons)} = (\# \text{ acres}) * (43560 \text{ sqft/acre}) * (25 \text{ ft high}) * (1/40 \text{ ton/cuft})$$

$$\text{Storage capacity (SC) of site (tons)} = 54450$$

$$\text{PTE of PM/PM10 (tons/year)} = E_f * SC * (40 \text{ cuft/ton}) * 365 \text{ days/year} / (2000 \text{ lbs/ton} * 43560 \text{ sqft/acre} * 25 \text{ ft})$$

<b>PTE of PM (tons/year) =</b>	<b>2.07</b>	<b>PTE of PM Controlled * (tons/year) =</b>	<b>1.04</b>
<b>PTE of PM10 (tons/year) =</b>	<b>2.07</b>	<b>PTE of PM10 Controlled * (tons/year) =</b>	<b>1.04</b>

\* The permittee plans to control fugitive emissions by watering the storage piles. This control is estimated to reduce particulate emissions by 50%.

**2. Storage Pile (Material) Handling**

Emissions are generated each time the material is handled. Exclusive of conveying operations, coke is handled three (3) times: when it is dumped from trucks, when it is loaded into the screening machine, and when the finished coke is loaded into trucks. According to AP 42, Chapter 13.2.4, emissions from material handling are calculated as follows:

$$EF (\text{lb/ton}) = k * (0.0032) * (U/5)^{1.3} / (M/2)^{1.4}$$

where:	k value for:
	PM
	PM10
	0.74
	0.35

U value =	10	mph
M value =	10	%
Material Throughput =	438,000	tons/yr

PM EF =	6.13E-04	lb/ton
PM10 EF =	2.90E-04	lb/ton

$$\text{PTE of PM (tons/year)} = EF (\text{lb/ton}) * \text{Maximum Throughput (tons/yr)} * 1 \text{ ton}/2000 \text{ lbs} * 3$$

$$\text{PTE of PM10 (tons/year)} = EF (\text{lb/ton}) * \text{Maximum Throughput (tons/yr)} * 1 \text{ ton}/2000 \text{ lbs} * 3$$

<b>PTE of PM (tons/year) =</b>	<b>0.40</b>
<b>PTE of PM10 (tons/year) =</b>	<b>0.19</b>

**3. Unpaved Road Emission Factors: AP-42**

According to AP-42, Section 13.2.2 Unpaved Roads, November 2006, the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$\text{lbs/VMT Equation: } E = k (s/12)^a (W/3)^b$$

Where:

Particle size multiplier k	4.9	dimensionless (PM-30 or TSP)	1.5 dimensionless PM-10
surface material silt content (%) s	4.8	Table 13.2.2-1	
mean vehicle weight W	15.0	tons	
Equation constants a	0.7	PM-30 or TSP Table 13.2.2-2	0.9 PM-10 Table 13.2.2-2
b	0.45	PM-30 or TSP Table 13.2.2-2	0.45 PM-10 Table 13.2.2-2

$$\text{PM Emission Factor} = (4.9) * (4.8/12)^{0.7} * (15/3)^{0.45} = 5.32 \text{ lbs PM / mile}$$

$$\text{PM10 Emission Factor} = (1.5) * (4.8/12)^{0.9} * (15/3)^{0.45} = 1.36 \text{ lbs PM10/ mile}$$

**4. Potential to Emit (PTE) of PM/PM10 from Unpaved Roads (Uncontrolled):**

	Vehicle Weight (tons)	Unpaved Total VMT	Total Vehicle PM Emissions (tons/yr)	Total Vehicle PM10 Emissions (tons/yr)
Maintenance Roads	15.0	3,687	9.81	2.50

**5. Potential to Emit (PTE) of PM/PM10 from Unpaved Roads (Controlled):**

	Vehicle Weight (tons)	Unpaved Total VMT	Total Vehicle PM Emissions (tons/yr)	Total Vehicle PM10 Emissions (tons/yr)
Maintenance Roads	15.0	3,687	4.91	1.25

The roadways will be sprayed with water as needed to control dust. Water spray is estimated to reduce particulate emissions by 50%.

**Methodology**

$$\text{PTE Unpaved Roads (Unlimited and Uncontrolled) (tons/yr)} = \text{Unpaved Total VMT (miles/year)} * \text{PM/PM10 Emission Factor} * 1 \text{ ton}/2000 \text{ lbs}$$

$$\text{PTE Unpaved Roads (Limited and Controlled) (tons/yr)} = \text{Unpaved Total VMT (miles/year)} * \text{PM/PM10 Emission Factor} * 1 \text{ ton}/2000 \text{ lbs} * (1 - \text{Control Efficiency \%})$$

Distance per round trip (miles) =	0.0379
Capacity of load (tons per trip) =	4.5
Coke throughput (tons/yr) =	438,000
VMT (miles/yr) = Throughput (ton/yr) x 1/Capacity (ton/trip) x Round trip distanc	3,687

**Appendix A: Emission Calculations  
Potential Emissions from Internal Combustion Engine (164 hp)  
[Diesel Fuel]**

Company Name: Mid-Continent Coal and Coke Company  
 Address: 3001 Dickey Road, East Chicago, Indiana 46312  
 Title V: 089-24404-05305  
 Reviewer: ERG/ST  
 Date: September 19, 2007

<b>Output (hp)</b>	<b>Output (hp-hour/year)</b>
164	1,436,640

Emission Factor (lb/hp-hour)	Pollutant					
	PM	PM10	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO
	2.20E-03	2.20E-03	2.05E-03	3.10E-02	2.51E-03	6.68E-03
PTE (tons/year)	1.58	1.58	1.47	22.3	1.81	4.80

One Reciprocating IC Engine

Emission factors are from AP-42, Chapter 3.3, Table 3.3-1, SCC #2-02-001-02 and 2-03-001-01. (October, 1996)  
 Assume all PM10 emissions are equal to PM.

**METHODOLOGY**

Output (hp-hour/year) = Output (hp) \* 8760 hours/year

PTE (tons/year) = Output (hp-hour/year) \* Emission Factor (lb/hp-hour) \* 1 ton/2000 lbs

**Appendix A: Emission Calculations  
Emissions Summary**

Company Name: Mid-Continent Coal and Coke Company  
 Address: 3001 Dickey Road, East Chicago, Indiana 46312  
 Title V: 089-24404-05305  
 Reviewer: ERG/ST  
 Date: September 19, 2007

**Uncontrolled PTE**

Emission Units/Process Equipment	PM	PM10	SO2	NOx	VOC	CO
Storage Piles	2.07	2.07	----	----	----	----
Transporting (Unpaved Roads)	9.81	2.50	----	----	----	----
Coke Handling Operations	0.40	0.19	----	----	----	----
Coke Processing Operations	0.60	0.20	----	----	----	----
Internal Combustion Engine (164 hp)	1.58	1.58	1.47	22.3	1.81	4.80
<b>TOTAL</b>	<b>14.5</b>	<b>6.54</b>	<b>1.47</b>	<b>22.3</b>	<b>1.81</b>	<b>4.80</b>

**Controlled PTE**

Emission Units/Process Equipment	PM	PM10	SO2	NOx	VOC	CO
Storage Piles	1.04	1.04	----	----	----	----
Transporting (Unpaved Roads)	4.91	1.25	----	----	----	----
Coke Handling Operations	0.40	0.19	----	----	----	----
Coke Processing Operations	0.60	0.20	----	----	----	----
Internal Combustion Engine (164 hp)	1.58	1.58	1.47	22.3	1.81	4.80
<b>TOTAL</b>	<b>8.53</b>	<b>4.26</b>	<b>1.47</b>	<b>22.3</b>	<b>1.81</b>	<b>4.80</b>