INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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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: August 1, 2007

RE: RJR Drying, Inc / 089-24599-00360

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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.

Enclosures
FNPER.dot 03/23/06

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(800) 451-6027
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Federally Enforceable State Operating Permit Renewal
OFFICE OF AIR QUALITY

RJR Drying, Inc.
3600 Canal Street
East Chicago, Indiana 46312

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

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. 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 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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

Operation Permit No.: F 089-24599-00360	
Issued by/Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 1, 2007 Expiration Date: August 1, 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 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

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

Source Address:	3600 Canal Street, East Chicago, Indiana 46312
Mailing Address:	3600 Canal Street, East Chicago, Indiana 46312
General Source Phone Number:	219-398-4300
SIC Code:	3312
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1 (22)]

This coke handling facility consists of the following:

(a) RJR Drying, Inc., the primary operation, owns and operates a stationary coke handling and drying plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00360);

(b) MCCC, the supporting operation, owns and operates one (1) portable coke screening, sizing, and handling plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-05057); and

(c) American Terminal owns RJR Dying, Inc., located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00357).

These three (3) plants are considered one single source because they have a support relationship and are located on the same property. IDEM made this determination in the review for FESOP #089-14838-00360, issued on January 13, 2003, and still applies to this permit renewal.

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

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

(a) One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.

(b) One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(c) One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(d) Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(e) One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(f) One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:

(1) One (1) receiving hopper, identified as P-5.

(2) One (1) screen, identified as P-5.

(3) One (1) covered conveyor, identified as C-6.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

(a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM10: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; and one (1) wet coke conveyor, identified as C-0. [326 IAC 6.8-1-2]

(b) Unpaved roads and parking lots with public access. [326 IAC 6.8-10] [326 IAC 6-4]

(c) One (1) wet coke storage pile. [326 IAC 6.8-10] [326 IAC 6-4]

A.5 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

(a) This permit, F 089-24599-00360, 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, until the renewal permit has been issued or denied.

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

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

(a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or

(b) the emission unit to which the condition pertains permanently ceases operation.

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

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

B.5 Severability [326 IAC 2-8-4(4)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

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

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

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All 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

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

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

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

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

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

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

B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) 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.

(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(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.12 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that 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 Telephone Number: (219) 757-0265 (ask for Compliance Section)
Facsimile Number: (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 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

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

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) 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 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

(a) All terms and conditions of permits established prior to F 089-24599-00360 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised, or

(3) deleted.

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

B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]

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

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

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State 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 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 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 2-8-15(b) through (d). 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 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(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 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(d) 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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

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

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][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 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

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

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

C.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 Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

(a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the in plant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

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

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

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three

(3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) 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.

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

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the 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.10 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

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

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 31, 2001.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) 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) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for

review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

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

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.

(b) One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(c) One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(d) Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(e) One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

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

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

D.1.1 PSD Minor Limits [326 IAC 2-2]

The Permittee shall comply with the following:

Emission Unit	Control	PM Emission Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/ Bucket Conveyor (P-4)	Baghouse B-4	2.06

Compliance with these limits in combination with Condition D.2.2 and potential PM emissions from insignificant activities will limit the souce wide PM emissions to less than 250 tons per year and render 326 IAC 2-2 (PSD) not applicable to this source.

D.1.2 FESOP Limit [326 IAC 2-8-4]

The PM_{10} emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C1-C5), and loadout hopper/bucket conveyor (P-4) shall not exceed the following pound per hour limits:

Emission Unit	Control	PM 10 Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/Bucket Conveyor (P-4)	Baghouse B-4	2.06

Compliance with these limits in combination with Condition D.2.2 and potential PM_{10} emissions from insignificant activities will limit the source wide PM_{10} emissions to less than 100 tons per year and will render the 326 IAC 2-7 (Part 70 permit) not applicable to this source.

D.1.3 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2), the particulate matter (PM) from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C1-C5), and loadout hopper/bucket conveyor (P-4) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

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

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

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

(a) Within 180 days after issuance of this permit F 089-24599-00360, in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM and PM_{10} testing for the baghouse B-1 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every ten (10) years from the date of the most recent valid compliance demonstration. PM_{10} includes filterable and condensable PM_{10}. Testing shall be conducted in accordance with 326 IAC 3-6 and Section C - Performance Testing.

(b) Within 5 years of performing PM and PM_{10} testing for baghouse B-1, in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM and PM_{10} testing for the baghouse B-4 utilizing methods as approved by the Commissioner. This test shall be repeated at least once every ten (10) years from the date of the most recent valid compliance demonstration. PM_{10} includes filterable and condensable PM_{10}. Testing shall be conducted in accordance with 326 IAC 3-6 and Section C - Performance Testing.

D.1.6 Particulate Control [326 IAC 2-8-5(a)(4)]

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

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

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

D.1.7 Visible Emissions Notations

(a) Visible emission notations of the facilities' baghouses B-1 and B-4 stack exhausts shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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

D.1.8 Parametric Monitoring

(a) The Permittee shall record the pressure drop across the baghouse B-4 controlling emissions from the coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and loadout hopper/bucket conveyor (P-4), at least once per day when the facilities are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances, shall be considered a deviation from this permit.

(b) The Permittee shall record the pressure drop across the baghouse B-1 controlling emissions from the rotary dryer (P-1), at least once per day when the rotary dryer is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions and Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions and Exceedances shall be considered a deviation from this permit.

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

D.1.9 Broken or Failed Bag Detection

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

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

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.7, the Permittee shall maintain a daily record of visible emission notations of the facilities' stacks exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation, (e.g. the process did not operate that day).

(b) To document compliance with Condition D.1.8, the Permittee shall maintain daily records of the pressure drop across the baghouse controlling the rotary dryer (P-1) and across the baghouse controlling the dry coke storage bin (P-2), sizing screen (P-3), coke conveyors (C1-C5), and the loadout hopper/ bucket conveyor (P-4). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:

(1) One (1) receiving hopper, identified as P-5.

(2) One (1) screen, identified as P-5.

(3) One (1) covered conveyor, identified as C-6.

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

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

D.2.1 PSD Minor Limit [326 IAC 2-2]

PM emissions from the screen (P-5) shall be less than 1.79 pounds per hour. Compliance with this limit in combination with Condition D.1.1 and potential PM emissions from the receiving hopper (P-5), covered conveyor (C-6), and insignificant activities will limit the source wide PM emissions to less than 250 tons per year and render 326 IAC 2-2 (PSD) not applicable to this source.

D.2.2 PSD and FESOP Limits [326 IAC 2-2] [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP), PM_{10} emissions from the screen shall be less than 0.85 pounds per hour. Compliance with this limit in combination with Condition D.1.2 and potential PM_{10} emissions from the receiving hopper (P-5), covered conveyor (C-6), and insignificant activities will limit the source wide PM_{10} emissions to less than 100 tons per year and will render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 permit) not applicable to this source.

D.2.3 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2), the particulate matter (PM) from the receiving hopper (P-5), the screen (P-5), and the covered conveyor (C-6) of this coke screening station shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

Compliance Determination Requirements

D.2.4 PM and PM10 Control [326 IAC 2-8-5 (a) (4)]

In order to comply with Conditions D.2.1, D.2.2, and D.2.3, the Permittee shall use wet suppression to control emissions of PM and PM10 from the screen (P-5), at all times the screen is in operation.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

(a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM10: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; and one (1) wet coke conveyor, identified as C-0. [326 IAC 6.8-1-2]

(b) Unpaved roads and parking lots with public access. [326 IAC 6.8-10] [326 IAC 6-4]

(c) One (1) wet coke storage pile. [326 IAC 6.8-10] [326 IAC 6-4]

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

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

D.3.1 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2), the particulate matter (PM) from the wet coke receiving hopper (P-0) and the wet coke conveyor (C-0) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.3.2 Fugitive Particulate Matter (PM)

Pursuant to 326 IAC 6.8-10 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.6 (Fugitive Dust Emissions) shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) attached as Appendix A. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

Compliance Determination Requirements

D.3.3 Particulate Matter (PM)

Pursuant to 326 IAC 6.8-10 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter), opacity from the activities (as applicable) shall be determined as follows:

(a) Paved Roads and Parking Lots
The average instantaneous opacity shall be the average of twelve (12) instantaneous opacity readings, taken for four (4) vehicle passes, consisting of three (3) opacity readings for each vehicle pass. The three (3) opacity readings for each vehicle pass shall be taken as follows:

(1) The first will be taken at the time of emission generation.

(2) The second will be taken five (5) seconds later.

(3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

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

(b) Unpaved Roads and Parking Lots
The fugitive particulate emissions from unpaved roads shall be controlled by the implementation of a work program and work practice under the fugitive dust control plan.

(c) Batch Transfer
The average instantaneous opacity shall consist of the average of three (3) opacity readings taken five (5) seconds, ten (10) seconds, and fifteen (15) seconds after the end of one (1) batch loading or unloading operation. The three (3) readings shall be taken at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume.

(d) Continuous Transfer
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9. The opacity readings shall be taken at least four (4) feet from the point of origin.

(e) Wind Erosion from Storage Piles
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plume and at approximately right angles to the plume. The limitations may not apply during periods when application of fugitive particulate control measures are either ineffective or unreasonable due to sustained very high wind speeds. During such periods, the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting the opacity limitation was not reasonable given prevailing wind conditions.

(f) Wind Erosion from Exposed Areas
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

(g) Material Transported by Truck or Rail
Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 22, except that the observation shall be taken at approximately right angles to the prevailing wind from the leeward side of the truck or railroad car. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with the in plant transportation requirement.

(h) Material Transported by Front End Loader or Skip Hoist
Compliance with this limitation shall be determined by the average of three (3) opacity readings taken at five (5) second intervals. The three (3) opacity readings shall be taken as follows:

(1) The first will be taken at the time of emission generation.

(2) The second will be taken five (5) seconds later.

(3) The third will be taken five (5) seconds later or ten (10) seconds after the first.

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

(i) Material Processing Limitations
Compliance with all opacity limitations from material processing equipment shall be determined using 40 CFR 60, Appendix A, Method 9. Compliance with all visible

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

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

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

D.3.4 Record Keeping Requirements

Pursuant to 326 IAC 6.8-10 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter):

(a) The source shall keep the following documentation to show compliance with each of its control measures and control practices:

(1) A map or diagram showing the location of all emission sources controlled, including the location, identification, length, and width of roadways.

(2) For each application of water or chemical solution to roadways, the following shall be recorded:

(A) The name and location of the roadway controlled

(B) Application rate

(C) Time of each application

(D) Width of each application

(E) Identification of each method of application

(F) Total quantity of water or chemical used for each application

(G) For each application of chemical solution, the concentration and identity of the chemical

(H) The material data safety sheets for each chemical

(3) For application of physical or chemical control agents not covered by 326 IAC 6.8-10, the following:

(A) The name of the agent

(B) Location of application

(C) Application rate

(D) Total quantity of agent used

(E) If diluted, percent of concentration

(F) The material data safety sheets for each chemical

(4) A log recording incidents when control measures were not used and a statement of explanation.

(5) Copies of all records required by this section shall be submitted to the department within twenty (20) working days of a written request by the department.

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

D.3.5 Reporting Requirements

(a) Pursuant to 326 IAC 6.8-10 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), a quarterly report shall be submitted, stating the following:

(1) The dates any required control measures were not implemented

(2) A listing of those control measures

(3) The reasons that the control measures were not implemented

(4) Any corrective action taken

(b) These reports shall be submitted within thirty (30) calendar days following the end of each calendar quarter and in accordance with Section C - General Reporting Requirements of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
Mailing Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F 089-24599-00360

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

Please check what document is being certified:

☐ 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:

Date:

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
Mailing Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F 089-24599-00360

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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by:_____

Title / Position:_____

Date:_____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
Mailing Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F 089-24599-00360

Months: _____ **to** _____ **Year:** _____

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".

□ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

□ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

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

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

Page 2 of 2

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

Form Completed by:__________________________________

Title / Position:______________________________________

Date:____

Phone: ____

Attach a signed certification to complete this report.

Attachment A
FUGITIVE PARTICULATE MATTER EMISSION DUST CONTROL PLAN

Source Name:	RJR Drying, Inc.
Source Address:	3600 Canal Street, East Chicago, Indiana 46312
Owner/Operator/Facility Contact:	John Sabol, Vice President Ron Sabol, President

Fugitive Particulate Matter Sources:

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

Annotated Map: See Attached

Vehicular Activity:

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

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

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

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

A) Responsibilities:

1) The Plant Manager will oversee the responsibility for inspecting roads, vehicles, coke storage tank entry and piles, maintaining their proper conditions, and implementing the Fugitive Dust Control Plan as needed and/or required.

2) Monitoring for visible emissions will be performed by employees who have worked at the facility for at least one (1) month and have been trained in the appearance/characteristics of normal visible emissions for a particular process.

B) Description of Control Measures:

1) Unpaved Roads - A 2,500 gallon tanker truck with a spray manifold applying a mixture of water and Nalco dust suppressant* will be applied to the roadway surfaces four (4) times per day. Dust suppression will be maintained on a regular basis except upon the event of precipitation. See Attachment 1. Visible emissions will be noted once per shift or upon use by traffic, and limitations will be maintained at <10% at all times. See Attachment 2.

2) Vehicle Transfer -

a) Semi-trucks conveying/transferring dry coke will be monitored once per shift or upon conveyance for visible emissions during handling and transfer at all times. Visible emission limitations will be maintained at 0%. See Attachment 2.

b) Payloaders transfer wet coke to the Receiving Hopper (P-0) which travels to the Wet Coke Conveyor (C-0). The wet coke has a natural suppressant of 18% moisture content. Visible emissions will be noted once per shift or upon conveyance and limitations will be maintained at <10% at all times. See Attachment 2.

3) Dry Coke Storage Tank - The dry coke storage tank is equipped with two (2) baghouses and two (2) vents. The baghouses will be maintained in order to control related emissions to the vents; the loadout entry will be monitored once per shift for emissions. Visible emission limitations from loadout entry will be maintained at 0%. See Attachment 2.

4) Aggregate Piles - The wet coke storage pile has a natural suppressant in that it maintains at least an 18% moisture content. Visible emissions will be noted once per shift and limitations will be maintained at <10% at all times. See Attachment 2.

C) Alternative Control Practices:

1) Certain conditions preventing control measures, such as a precipitation event and immediately following, would negate the use of chemical dust suppressant for roadways. Upon change in the weather, the dust suppression program would resume.

2) Aside from facility shut-down, process-related shut-downs, lack of vehicle traffic, or inclement weather, monitoring for visible emissions will be performed on a regular basis.

3) At any time that an abnormal emission-related incident occurs, the Agency will be notified within the required timely period.

D) Schedule for Achievable Compliance:

Many aspects of the Fugitive Dust Control Plan, such as roadway dust suppression, are already in place. Monitoring in specific areas will be initiated in the immediate future, upon issuance of the pending FESOP permit; no schedule of compliance will be needed in order to implement this plan.

E) Recordkeeping:

Records which document all control measures and activities to be implemented in accordance with the approved control plan shall be maintained at the facility.

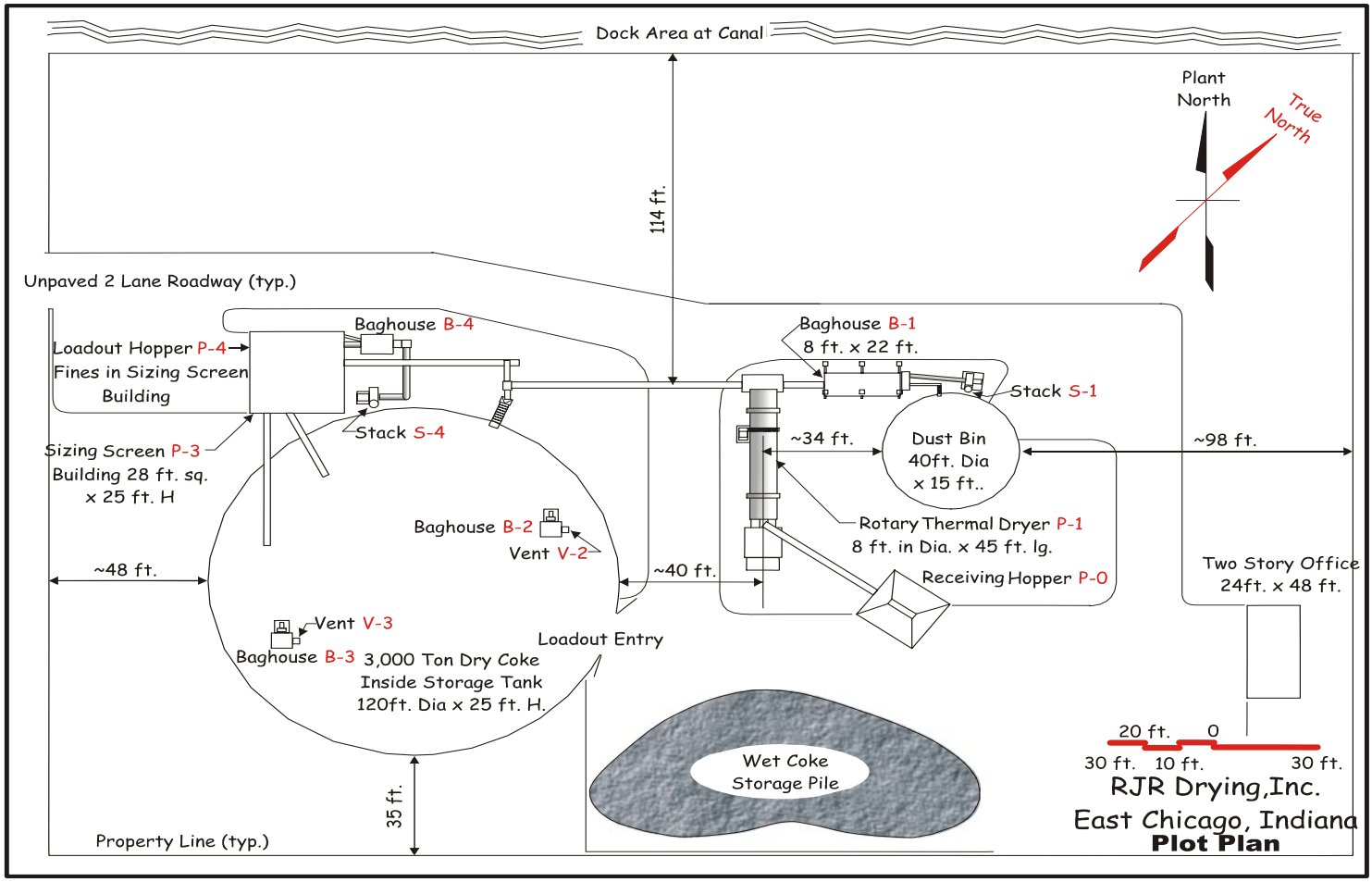
RJR Drying, Inc.
ROAD DUST SUPPRESSANT IMPLEMENTATION LOG
Attachment 1

Date	Time	Initials	Roadway I.D.	Method of Application	Application Rate	Width of Application	Quantity Water/ Chemical Applied	Concentration & Chemical I.D.	Rainfall (Inches)

RJR Drying, Inc.
FUGITIVE DUST CONTROL VISIBLE EMISSIONS LOG
Attachment 2
(check Normal/Abnormal as Completed)

Date	Time/ Shift	Initials	Roadways	Semi-Trucks	Payloaders	Wet Coke Receiving Hopper (P-0)	Wet Coke Conveyor (C-0)	Dry Coke Storage Tank Loadout Entry	Wet Coke Storage Pile	Comments

RJR Drying, Inc.
Plot Plan



Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	RJR Drying, Inc.
Source Location:	3600 Canal Street, East Chicago, IN 46312
County:	Lake County
SIC Code:	3312
Permit Renewal No.:	F 089-24599-00360
Permit Reviewer:	Timothy R. Pettifor

On June 28, 2007, the Office of Air Quality (OAQ) had a notice published in The Post Tribune, Merillville, Indiana and The Times, Munster, Indiana, stating that RJR Drying, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a coke handling and drying plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments were received. Upon further review, IDEM, OAQ has decided to make the following changes to the permit. The changes listed below have been made to FESOP No. F 089-24599-00360. The Table of Contents has been updated. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. Plant # 089-05217 was relocated to 3001 Dickey Road, East Chicago, Indiana. A relocation approval # 089-18449-05217 was issued on December 17, 2003. Currently, only plants # 089-00360, # 089-00357, and # 089-05057 are considered one (1) single source at the location of 3600 Canal Street, East Chicago, Indiana 46312. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision. Condition A.2 has been revised as follows.

   A.2 Part 70 Source Defini~~n~~tion [326 IAC 2-8-1] [326 IAC 2-7-1 (22)]
   This coke handling facility consists of the following:

   (a) RJR Drying, Inc., the primary operation, owns and operates a stationary coke handling and drying plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00360);

   (b) MCCC, the supporting operation, owns and operates ~~two (2~~) **one (1)** portable coke screening, sizing, and handling plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-05057 and ~~#089-05217~~); and

(c) American Terminal owns RJR Dying, Inc., located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00357).

These ~~four (4)~~ **three (3)** plants are considered one single source because they have a support relationship and are located on the same property. IDEM made this determination in the review for FESOP #089-14838-00360, issued on January 13, 2003, and still applies to this permit renewal.

2. The Table of Contents inadvertently omitted the Compliance Determination Requirements (Condition D.2.4). The Table of Contents has been revised as follows:

D.2. EMISSIONS UNIT OPERATION CONDITIONS 28

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D.2.3 Particulate Matter [326 IAC 6.8-1-2]

Compliance Determination Requirements
D.2.4 PM and PM10 Control [326 IAC 2-8-5 (a) (4)]

3. Conditions D.1.5 (a), D.1.9 (b), and D.2.3 have been revised for clarity and now read as follows:

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

(a) Within 180 days after issuance of this **permit** F 089-24599-00360, in order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM and PM_{10} testing for the baghouse B-1 utilizing methods as approved by the Commissioner.

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D.1.9 Broken or Failed Bag Detection

(b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line ~~(or emissions unit – choose the most appropriate)~~.

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D.2.3 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2), the particulate matter (PM) from the receiving hopper (P-5), the screen (P-5), and the covered conveyor **(C-6)** of this coke screening station shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

4. Typographical errors in the Table of Contents have been corrected as follows:

A. SOURCE SUMMARY
- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Part 70 Source Definition [326 IAC 2-8-1] [326 IAC 2-7-1(22)]
- ~~A.2~~ **A.3** Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- ~~A.3~~ **A.4** Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]
- ~~A.4~~ **A.5** FESOP Applicability [326 IAC 2-8-2]

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

D.1.10 Record Keeping Requirement**s**

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

D.3.4 Record Keeping Requirement**s**

5. A typographical error in Condition C.1 (b) has been corrected as follows:

(b) This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)**)** not applicable.

6. Typographical errors in Condition D.1.9 (a) have been corrected as follows:

(a) For a single compartment baghouses controlling emissions from a process operated continuously, a failed unit~~s~~ and the associated process shall be shut down immediately until the failed unit~~s~~ has been repaired or replaced.

7. A typographical error in Condition D.3.3 (e) has been corrected as follows:

(e) Wind Erosion from Storage Piles
The opacity shall be determined using 40 CFR 60, Appendix A, Method 9, except that the opacity shall be observed at approximately four (4) feet from the surface at the point of maximum opacity. The observer shall stand approximately fifteen (15) feet from the plum**e** and at approximately right angles to the plume.

Indiana Department of Environmental Management
Office of Air Quality

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

Source Background and Description

Source Name:	RJR Drying, Inc.
Source Location:	3600 Canal Street, East Chicago, IN 46312
County:	Lake County
SIC Code:	3312
Permit Renewal No.:	F 089-24599-00360
Permit Reviewer:	Timothy R. Pettifor

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from RJR Drying, Inc. relating to the operation of a coke handling and drying plant**.**

History

On April 10, 2007, RJR Drying, Inc. submitted applications to the OAQ requesting to renew its operating permit. RJR Drying, Inc. was issued a FESOP on January 13, 2003.

Source Definition

This coke handling facility consists of the following:

(a) RJR Drying, Inc., the primary operation, owns and operates a stationary coke handling and drying plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00360);

(b) MCCC, the supporting operation, owns and operates two (2) portable coke screening, sizing, and handling plants, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-05057 and #089-05217); and

(c) American Terminal owns RJR Dying, Inc., located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00357).

These four (4) plants are considered one single source because they have a support relationship and are located on the same property. IDEM made this determination in the review for FESOP #089-14838-00360, issued on January 13, 2003, and still applies to this permit renewal.

Permitted Emission Units and Pollution Control Equipment

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

(a) One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.

(b) One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(c) One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(d) Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.

(e) One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to stack V-4.

(f) One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:

(1) One (1) receiving hopper, identified as P-5.

(2) One (1) screen, identified as P-5.

(3) One (1) covered conveyor, identified as C-6.

Insignificant Activities

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

(a) Units with emissions equal to or less than the following threshold: 5 tons per year PM or PM10: One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; and one (1) wet coke conveyor, identified as C-0. [326 IAC 6.8-1-2]

(b) Unpaved roads and parking lots with public access. [326 IAC 6.8-10] [326 IAC 6-4]

(c) One (1) wet coke storage pile. [326 IAC 6.8-10] [326 IAC 6-4]

Existing Approvals

Since the issuance of the FESOP (089-14838-00360) on January 13, 2003; the source has constructed or has been operating under the following approvals as well:

(a) Minor Permit Modification No. 089-18253-00360 issued on January 13, 2004; and

(b) Administrative Amendment No. 089-19096-00360 issued on June 16, 2004; and

(c) Administrative Amendment No. 089-19557-00360 issued on October 27, 2004; and

(d) Minor Permit Modification No. 089-21490-00360 issued on August 12, 2005; and

(e) Administrative Amendment No. 089-22108-00360 issued on January 6,2006; and

(f) Significant Permit Modification No. 089-22443-00360 issued on May 24,2006; and

(g) Administrative Amendment No. 089-23574-00360 issued on November 13, 2006.

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

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack/ Vent ID	Operation	Height (feet)	Stack Dimensions (feet)	Flow Rate (acfm)	Temperature (^{0}F)
S-1	Baghouse #1 (B-1)	41	2.67	12000	170
V-4	Baghouse #4 (B-4)	30	1 x 1.17	8000	170

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-7).

County Attainment Status

The source is located in Lake County

Pollutant	Status
PM_{10}	Attainment
$PM_{2.5}$	Nonattainment
SO_2	Attainment
NOx	Attainment
8-hour Ozone	Nonattainment
CO	Attainment
Lead	Attainment

(a) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. 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 non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

(b) 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. Therefore, VOC emissions and NOx emissions are considered when evaluating the rule applicability relating to ozone standards. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(c) Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.

(d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(e) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	748.4
PM-10	740.0
SO_2	0.0
VOC	0.4
CO	6.6
NO_x	7.9
Lead	3.94E-05

HAPs	tons/year
Lead	3.94E-05
Benzene	1.6E-04
Dichlorobezene	9.5E-05
Formaldehyde	5.9E-03
Hexane	1.4E-01
Toluene	2.7E-04
Cadmium	8.7E-05
Chromium	1.1E-04
Magnesium	2.9E-05
Nickel	1.7E-04
Total	1.5E-01

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM-10 is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their PM-10 emissions to less than Title V levels, therefore the source will be issued a FESOP.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of lead is less than five (5) tons per year.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants is less than one hundred (100) tons per year.

(d) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	4
PM-10	4
SO_2	0
VOC	0
CO	2
NO_x	3
Pb	0

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

	Potential To Emit (tons/year)						
Process/emission unit	**PM**	**PM-10**	**SO_2**	**VOC**	**CO**	**NO_x**	**HAPs**
Rotary Dryer (P-1)	13.6	14.1	-	0.4	6.6	7.9	.15
Dry Coke Storage Bin (P-2),Sizing Screen (P-3), Coke Conveyors (C1-C5), and Loadout Hopper/ Bucket Conveyor (P-4)	9.02	9.02	-	-	-	-	-
Receiving Hopper (P-5)	0.93	.45	-	-	-	-	-
Screen (P-5)	7.85	3.73					
Covered Conveyor (C-6)	.31	.147					
Insignificant Activities: Wet coke receiving hopper (P-0), wet coke conveyor (C-0), and wet coke storage pile.	5	5	-	-	-	-	-
Total Emissions:	36.71	32.45	-	0.4	6.6	7.9	.15

(a) This existing stationary source is not major for PSD because the emissions of each attainment pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.

(b) This existing stationary source is not major for Emission Offset because the emissions of VOC, NO_x, and PM_{10} (as a surrogate for $PM_{2.5}$) are less than one hundred (<100) tons per year.

(c) Fugitive Emissions:

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20, 40 CFR Part 61, and 40 CFR Part 63) included in the permit for this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))
Because the source was constructed in 1994, is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, and has uncontrolled potentials to emit of PM and PM_{10} greater than 250 tons per year, 326 IAC 2-2 (Prevention of Significant Deterioration) could be applicable. However, all PM and PM_{10} emissions from the rotary dryer, dry coke storage bin, sizing screen, coke conveyors, and loadout hopper/bucket conveyor from the original construction and subsequent source modifications have been controlled by baghouses; and PM and PM_{10} emissions from the coke screening station have been controlled by wet suppression; and permitted PM and PM_{10} emission levels have never exceeded 250 tons per year. PM_{10} emissions are limited to less than 100 tons per year for this source to be a FESOP. This limitation will also render 326 IAC 2-2 not applicable to this source. PM emissions will be limited to less than 250 tons per year in order to render 326 IAC 2-2 (PSD) not applicable to the source.

The following enforceable emission limits have been established for PM emissions:

Emission Unit	PM Emission Limit (lbs/hr)
Rotary Dryer (P-1)	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/Bucket Conveyor (P-4)	2.06
Screen (P-5)	1.79

Compliance with the above limits in combination with potential PM emissions from the receiving hopper (P-5), covered conveyor (C-6) and insignificant activities will limit the source wide PM emissions to less than 250 tons and will render 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-3 (Emission Offset)
The uncontrolled VOC and NO_x emissions are less than 100 tons per year each. Therefore, the source is not a major source for Emission Offset for ozone.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)
The operation of the rotary dryer (P-1), dry coke storage bin (P-2), sizing screen (P-3), five (5) coke conveyors (C1-C5), loadout hopper/bucket conveyor (P-4), and coke screening station (receiving hopper, screen (P-5) and conveyor (C-6)) will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-8 (FESOP)
The following enforceable emission limits have been established for PM_{10} emissions:

Emission Unit	PM 10 Emission Limit (lbs/hr)
Rotary Dryer (P-1)	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/Bucket Conveyor (P-4)	2.06
Screen (P-5)	0.85

Compliance with the above limits in combination with potential PM_{10} emissions from the receiving hopper (P-5), covered conveyor (C-6), and insignificant activities will limit the source wide PM_{10} emissions to less than one hundred (100) tons per twelve (12) consecutive month period and will render 326 IAC 2-7 (Part 70 Permit) not applicable. This will also render 326 IAC 2-2 (PSD) not applicable to the source.

326 IAC 2-6 (Emission Reporting)
Revisions to 326 IAC 2-6 (Emission Reporting) became effective March 27, 2004. The Permittee is no longer required to submit an emission statement; therefore, the emission statement is removed from the permit.

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 Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

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

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)
The source is subject to the requirements of 326 IAC 6.8-10 because the souce is located in Lake County and it has the potential to emit fugitive particulate matter emissions greater than five (5) tons per year.

Pursuant to 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter) the particulate matter emissions from source wide activities shall meet the following requirements:

a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).

(b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).

(c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).

(d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.

(e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

(f) There shall be a zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time.

(g) The opacity of fugitive particulate emissions from the in plant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).

(h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

(i) The PM_{10} emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.

(j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

(k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

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

State Rule Applicability – Individual Facilities

326 IAC 6.8-1-2 (Particulate Matter Limitations For Lake County)
Pursuant to 326 IAC 6.8-1-2 the particulate matter emissions shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf) from the coke screening station, P-5 and C-6.

Pursuant to 326 IAC 6.8-1-2 the particulate matter (PM) emissions shall not exceed three-hundreths (0.03) grain per dry standard cubic foot (dscf) from P-1 and P2, P3,C1-C5, and P4. The equivalent pounds per hour limit for the baghouses B-1 and B-4 are listed below:

Baghouse	Exhaust flow rate (acfm)	PM Limit (lbs/hr)
B-1	12,000	3.09
B-4	8,000	2.06

PM Limit = .03 gr/ft3 x 1lb/7000 gr x Exhaust flow rate ft3/min x 60 min/hour.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-2(e), the PM emissions from baghouses B-1 and B-4 shall not exceed 32.1 lbs/hour each when operating at a process weight rate of 21.6 tons per hour. This pound per hour limitation is based upon the following:

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

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour
= 43,200 pounds/hour = 21.6 tons per hour

$E = 4.10\ (21.6^{0.67}) = 32.1$ lbs/hour

Since the limits in IAC 6.8-1-2 are more strigent than those in IAC 6-3-2, the limit for the rotary dryer is 3.09 lbs/hour; and the limit for the dry coke storage bin, sizing screen (P-3), coke conveyors, and loadout hopper/bucket conveyor is 2.06 lbs/hour.

The baghouse B-1 shall be in operation at all times the rotary dryer (P-1) is in operation, in order to comply with 326 IAC 6.8-1-2. The baghouse B-4 shall be in operation at all times the dry coke storage bin (P-2), sizing screen (P-3), coke conveyors (C1-C5), and loadout hopper/ bucket conveyor (P-4) are in operation, in order to comply with 326 IAC 6.8-1-2. The wet suppression system shall be in operation at all times the coke screening station screen (P-5) is in operation, in order to comply with 326 IAC 6.8-1-2.

Compliance Determination and Monitoring Requirements

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

Testing:

The rotary dryer, dry coke storage bin, sizing screen, coke conveyors, and loadout hopper/ bucket conveyor have applicable compliance determination conditions as specified below:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Rotary Dryer (P-1)	Baghouse B-1	180 days after issuance of this permit	PM/PM10	Every 10 years	0.03 gr/dscf, and 3.09 lbs/hr
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5),Loadout Hopper/ Bucket Conveyor (P-4)	Baghouse B-4	Within 5 years of the testing of Baghouse B-1.	PM/PM10	Every 10 years	0.03 gr/dscf and 2.06 lbs/hr.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse #1(B-1)	Water Pressure Drop	Daily	1 to 6 inches	Response Steps: Initial inspection and evaluation, any necessary follow up actions to return operation to within indicator range, designated condition, or below the applicable emission limitation or standard.
	Visible Emissions		Normal-Abnormal	
Baghouse #4 (B-4)	Water Pressure Drop	Daily	1 to 6 inches	Response Steps: Initial inspection and evaluation, any necessary follow up actions to return operation to within indicator range, designated condition, or below the applicable emission limitation or standard.
	Visible Emissions		Normal-Abnormal	

These monitoring conditions are necessary because the baghouses for the rotary dryer (P-1), dry coke storage bin (P-2), sizing screen (P-3), coke conveyors (C1-C5), and loadout hopper/bucket conveyor (P-4), must operate properly to ensure compliance with 326 IAC 6-8 (Particulate Matter Limitations For Lake County) and 326 IAC 2-8 (FESOP).

Recommendation

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

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

An application for the purposes of this review was received on April 10, 2007.

Conclusion

The operation of this coke handling and drying plant shall be subject to the conditions of the attached FESOP Renewal No. F 089-24599-00360.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Rotary Thermal Dryer

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, Indiana 46312
Permit Number: F089-24599-00360
Reviewer: Timothy R. Pettifor
Date: 11-Jun-2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
18.0	157.7

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.6	0.0	7.9	0.4	6.6

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100 lb/MMSCF

Methodology

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

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Rotary Thermal Dryer
HAPs Emissions

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, Indiana 46312
Permit Number: F089-24599-00360
Reviewer: Timothy R. Pettfor
Date: 11-Jun-2007

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.656E-04	9.461E-05	5.913E-03	1.419E-01	2.681E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	3.942E-05	8.672E-05	1.104E-04	2.996E-05	1.656E-04
				Total HAPS (tons/year)	1.50E-01

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculation
For Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Conveyors (C1-C5), and Loadout Hopper/ Bucket Conveyor (P-4)

Company Name: RJR Drying, Inc.
Address: 3600 Canal Street, Inc.
Permit #: F089-024599-00360
Reviewer: Timothy R. Pettifor
Date: 11-Jun-2007

Maximum Throughput = 43, 200 lb/hr = 21.6 tons/hr

Process	Uncontrolled PM/PM10 Emission Factor (lbs/ton)	Uncontrolled PTE of PM/PM10 (tons/yr)	Controlled PTE of PM/PM10 (tons/yr)
*Rotary Dryer (P-1)	3.7	350.05	3.15
**Dry Coke Storage Bin (P-2)	0.61	57.71	2.1
**Sizing Screen (P-3)	0.61	57.71	
**Coke Conveyors (C1-C5)	2.2	208.1	
**Loadout Hopper/Bucket Conveyor (P-4)	0.61	57.71	
Total:		**731.28**	**5.25**

* The Rotary Dryer uncontrolled emission factor is from AP-42, Chapter 11.10 , Table 11.10-1, PM Emission factors for Coal Cleaning (11/95, SCC 3-05-010-03).

**The Dry Coke Storage Bin, Coke Conveyors, and Loadout Hopper/Bucket Conveyor uncontrolled emission factors are from AP-42, Chapter 11.17, Table 11.17-4, Emission Factors for Lime Manufacturing Raw Material and Product Processing and Handling. (01/95, SCC 3-05-0160026, 3-05-016-16 and 3-05-016-15).

Methodology: Uncontrolled PTE of PM (tons /yr) = Maximum Throughput (tons/yr) X Uncontrolled Emission Factor (lbs/ton) x 1ton/2000lbs x 8760 hr/year.

Controlled Emissions:

The emissions of the Rotary Dryer are controlled by a baghouse, B-1, exhausting to a stack S-1.
Baghouse Outlet Grain Loading: 0.007 gr/ft3
Baghouse Flow: 12000 ft3/min
Controlled PM/PM10 Emissions (lbs/hr) = .007 grains/ft3 X 1lb/7000gr X 12000 ft3/min X 60 min/hr =0.72 lbs/hr
Controlled PM/PM10 Emissions (tons/yr) = 0.72 lbs/hr X 8760 hr/yr X 1 ton/ 2000 lbs. = 3.15 tons/yr

All of the other processes are controlled by a baghouse, B-4, exhausting to a vent V-4.
Baghouse Outlet Grain Loading: 0.007 gr/ft3
Baghouse Flow: 8000 ft3/min
Controlled PM/PM10 Emissions (lb/hr)= .007 grains/ft3 X 1lb/7000 grains X 8000 ft3/min X 60 min/hr = 0.48 lbs/hr
Controlled Emissions (tons/yr) = 0.48 lbs/hr X 8760 hr/yr X 1 ton/ 2000 lbs. = 2.10 tons/year.

Appendix A: Emission Calculation
PM/PM 10 Emissions
From the Screening Station Hopper (P-5), Screen (P-5), and the Conveyor(C-6)

Company Name: RJR Drying, Inc.
Address: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-24599-00360
Reviewer Timothy R. Pettifor
Date: 11-Jun-2007

Maximum Throughput Rate = 24 tons/hr

Process	Number of Units	PM 10 Emission Factor (lbs/ton)	PM Emission Factor (lbs/ton)	Uncontrolled PM 10 Emissions (tons/yr)	Uncontrolled PM Emissions (tons/yr)	Control Efficiency	Controlled PM 10 Emissions (tons/yr)	Controlled PM Emissions (tons/yr)
*Feed Hopper (P-5)	1	0.0043	0.0088	0.45	0.93	0%	0.45	0.93
**Screen (P-5)	1	0.071	0.1491	7.46	15.7	50%	3.73	7.85
**Covered Conveyor (C-6)	1	0.0014	0.00294	0.147	0.31	0%	0.147	0.31
Total				**8.06**	**16.9**		**4.33**	**9.09**

The PM/PM 10 emissions of the screen are controlled by wet suppression.

*The uncontrolled PM/PM 10 emission factors for the feeder are the ones for low silt batch drop from iron and steel mill in AP-42, Table 12.5-4 (10/86).

** The uncontrolled PM 10 emission factors for the screen and the covered conveyor are from AP-42, Chapter 11.19.2, Table 11.19.2-2-
Crushed stone processing operations (01/95, SCC 3-05-020-021 and 3-05-020-06).

Methodology

Uncontrolled PTE (tons/yr)=Maximum throughput (tons/hr) x Emission factor (lbs/ton) x 8760 hr/yr x 1ton/2000 lbs.

Controlled PTE (tons/yr) = Uncontrolled PTE (tons/yr) x (1- control efficiency)

Appendix A: Emission Calculations
Fugitive Dust Emissions From Unpaved Road

Company Name: RJR Drying, Inc.
Address: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-024599-00360
Reviewer: Timothy R. Pettifor
Date: 11-Jun-2007

Emission Formula 1a From AP 42, Chapter 13.2.2: k(s/12)^a(W/3)^b=lbs/VMT

Constants from Table 13.2.2-2:		
k for PM-10		1.5
k for PM		4.9
a for PM-10		0.9
a for PM		0.7
b		0.45
s=	Silt Content of Road Surface	2.6
Information from RJR		
W =	Mean Vehicle weight (in tons)	26.25
Maximum rate of Vehicle Miles Traveled per hr		0.341

Emissions:

Uncontrolled PM (tons/yr)	Uncontrolled PM10 (tons/yr)	Control Efficiency	Controlled PM (tons/yr)	Controlled PM10 (tons/yr)
6.66	1.5	70%	2	0.45

Uncontrolled PM=[4.9 x{(2.6/12)^0.7} x {(26.35/3)^.45}] x 0.341 VMT/hr x 8760 hr/yr x 1 ton/2000 lbs= 6.66 tons/year.
Uncontrolled PM10= [1.5 x {(2.6/12)^0.9) x{(26.25/3)^.45}] x0.341 VMT/hr x 8760 hr/yr x 1 ton/2000lbs= 1.50 tons/year.
Control Efficency based on best engineering estimate of 4 times daily water and suppresant treatment on roadway surfaces 65%-75% efficient-mean value of 70% used for calculations.
Controlled PM= Uncontrolled Emission x (1-control efficiency)=2.0 tons/yr.
Controlled PM10=Uncontrolled Emission x (1-control efficiency)=.45 tons/yr

Appendix A: Emission Summary
Uncontrolled Potential to Emit (tons/yr)

Company Name: RJR Drying, Inc.
Address: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-024599-00360
Reviewer: Timothy R. Pettifor
Date: 11-Jun-07

Uncontrolled Potential to Emit (tons/year)																
Process/ Emission Unit	**PM**	**PM10**	**SO2**	**VOC**	**CO**	**NOx**	**Pb**	**Ben-zene**	**Dichloro-Benzene**	**Form-aldehyde**	**Hexane**	**Toluene**	**Cd**	**Cr**	**Mn**	**Ni**
Rotary Dryer (P-1)	350.2	350.7	0	0.4	6.6	7.9	3.94 E-05	1.6 E-04	9.5 E-05	5.9 E-03	0.14	2.7 E-04	8.7 E-05	1.1 E-04	2.9 E-05	1.7 E-04
Dry Coke Storage Bin (P-2)	57.71	57.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sizing Screen (P-3)	57.71	57.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Coke Conveyors (C1-C5)	208.1	208.1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Loadout Hopper/ Bucket Conveyor (P-4)	57.71	57.71	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Receiving Hopper (P-5)	0.93	0.45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Screen (P-5)	15.7	7.46	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Covered Conveyor (C-6)	0.31	0.147	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	**748.4**	**740**	**0**	**0.4**	**6.6**	**7.9**	**3.94 E-05**	**1.6 E-04**	**9.5 E-05**	**5.9 E-03**	**0.14**	**2.7 E-04**	**8.7 E-05**	**1.1 E-04**	**2.9 E-05**	**1.7 E-04**

Appendix A: Limited Emissions (tons/year)

Company Name: RJR Drying, Inc.
Address: 3600 Canal Street, East Chicago, IN 46312
Permit #: F089-024599-00360
Reviewer: Timothy R. Pettifor
Date: 11-Jun-07

Limited Potential to Emit (tons/year)																
Process/ Emission Unit	**PM**	**PM10**	**SO2**	**VOC**	**CO**	**NOx**	**PB**	**Ben-zene**	**Dichloro-Benzene**	**Form-aldehyde**	**Hexane**	**Toluene**	**Cd**	**Cr**	**Mn**	**Ni**
Rotary Dryer (P-1)	13.6	14.1	0	0.4	6.6	7.9	3.94 E-05	1.6 E-04	9.5 E-05	5.9 E-03	0.14	2.7 E-04	8.7 E-05	1.1 E-04	2.9 E-05	1.7 E-04
*Dry Coke Storage Bin (P-2)	9.02	9.02	0	0	0	0	0	0	0	0	0	0	0	0	0	0
*Sizing Screen (P-3)																
*Coke Conveyors (C1-C5)																
*Loadout Hopper/ Bucket Conveyor (P-4)																
Receiving Hopper (P-5)	0.93	0.45	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Screen (P-5)	7.85	3.73	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Covered Conveyor (C-6)	0.31	0.147	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Insignificant Activities	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	**36.71**	**32.45**	**0**	**0.4**	**6.6**	**7.9**	**3.94 E-05**	**1.6 E-04**	**9.5 E-05**	**5.9 E-03**	**0.14**	**2.7 E-04**	**8.7 E-05**	**1.1 E-04**	**2.9 E-05**	**1.7 E-04**

* The Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), and Loadout Hopper/Bucket Conveyor (P-4) are all controlled by the same baghouse, B-4.

The Limit for the Rotary Dryer was calculated using the following information: Limit from 326 IAC 6.8-1-2 = 0.03 gr/dscf; Baghouse Flow = 12000 ft3/min.
Hourly Limit = 0.03 gr/ft3 x 1 lb/7000 gr x 12000 ft3/min x 60 min/hr = 3.09 lbs/hr.

The limit for the Dry Coke Storage Bin, Sizing Screen, Coke Conveyors and Loadout Hopper/ Bucket Conveyor was calculated using the following information:
Limit from 326 IAC 6.8-1-2 = 0.03 gr/dscf; Baghouse Flow = 8000 ft3/min; Hourly Limit = 0.03 gr/ft3 x 1 lb/7000 gr x 8000 ft3/min x 60 min/hr = 2.06 lbs/hr.