



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
MC 61-53
(317) 232-8603
(800) 451-6027
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TO: Interested Parties / Applicant
DATE: January 14, 2008
RE: Lone Star Industries, Inc. dba Buzzi Unicem USA / 133-25460-00002
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Mr. Jay Patterson
Lone Star Industries, Inc. dba Buzzi Unicem USA
P.O. Box 486
Greencastle, Indiana 46135

January 14, 2008

Re: 133-25460-00002
Significant Permit Modification to
Part 70 Operating Permit No. 133-6927-00002

Dear Mr. Patterson:

Lone Star Industries, Inc. dba Buzzi Unicem USA was issued a Part 70 Operating Permit No. 133-6927-00002 on April 14, 2004 for a stationary portland cement manufacturing plant. A letter requesting changes to this permit was received on September 25, 2007. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of pneumatic conveyors and storage silos for an alternate fuel source to the list of emission units. PSD minor limits, particulate control requirements, compliance monitoring requirements and recordkeeping requirements have also been added to the permit.

All other conditions of the permit shall remain unchanged and in effect. Please find attached a copy of the revised permit.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Mr. Stephen Treimel, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7902 to speak directly to Mr. Treimel. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Original signed by
Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Attachments

ERG/ST

cc: File - Putnam County
Putnam County Health Department
Air Compliance Section Inspector
Compliance Data Section
Administrative and Development
Billing, Licensing and Training Section



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Lone Star Industries, Inc. dba Buzzi Unicem USA
3301 South County Road 150 West
Greencastle, Indiana 46135**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

Operation Permit No.: T133-6927-00002	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 14, 2004 Expiration Date: April 14, 2009
First Minor Permit Modification No.: 133-19255-00002, issued on September 20, 2005 First Administrative Amendment No.: 133-21744-00002, issued on October 28, 2005 Second Administrative Amendment No.: 133-22491-00002, issued on February 13, 2006 Third Administrative Amendment No.: 133-23605-00002, issued on December 7, 2006 Second Minor Permit Modification No.: 133-23892-00002, issued on May 7, 2007 First Significant Permit Modification No.: 133-24198-00002, issued on September 7, 2007 Third Minor Permit Modification No.: 133-25090-00002, issued on October 16, 2007	
Second Significant Permit Modification No.: 133-25460-00002	Affected Pages: Entire Permit
Issued by: <i>Original signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: January 14, 2008 Expiration Date: April 14, 2009

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Portland cement manufacturing plant.

Source Address:	3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address:	P.O. Box 486, Greencastle, Indiana 46135
General Source Phone Number:	(765) 653-9766
SIC Code:	3241, 1422
County Location:	Putnam
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source under PSD Rules Major Source under Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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

- (a) Quarry Activities:
 - (1) Removal and transfer of overburden material, drilling and blasting of limestone, and loading of raw materials using mobile equipment.
- (b) Raw Material Sizing Activities:
 - (1) One (1) primary crusher, identified as Point 1-8 (201G); and one (1) vibrating feeder, identified as Point 1-9A (201V); both constructed in 1969, modified in 1998 and 1999, with a nominal capacity of 1,300 tons of limestone per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (2) Outside storage piles, modified in 1999, utilizing water mist suppression or equivalent dust suppression to control particulate emissions; and
 - (3) Raw material sizing transfer equipment including:
 - (A) One (1) apron feeder, identified as Point 1-14 (206V), constructed in 1969 and modified in 1999, with a nominal throughput of 400 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (B) One (1) belt conveyor, identified as Point 1-9B (214V), constructed in 1969, with a nominal throughput of 1,300 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;

- (C) Three (3) vibrating feeders, identified as Point 1-11 (202V-204V), all constructed in 1969 and modified in 1999, with a nominal capacity of 1,300 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (D) Three (3) belt conveyors, identified as Point 1-15 (215V, 305V, 251V), constructed in 1969, 1969, and 2000, respectively, with a nominal capacity of 1,300 tons per hour, equipped with one (1) fabric filter system (FF 1-15, baghouse 209L) to control particulate emissions; and
 - (E) One (1) secondary crusher system, identified as SC-1, constructed in 2001, with a nominal capacity of 600 tons of limestone and additives per hour; controlled by three baghouses (208L, 208L1, 210L), exhausting to three (3) stacks (208L, 208L1, 210L), respectively. The secondary crusher system is totally enclosed and consists of the following pieces of equipment:
 - (i) One (1) belt conveyor, identified as Point 1-16A (202G2V2), with a nominal capacity of 525 tons per hour; one (1) screen, identified as Point 1-16B (205G), with a nominal capacity of 600 tons per hour; one (1) crusher, identified as Point 1-16C (202G2), with a nominal capacity of 525 tons per hour; one (1) belt conveyor, identified as Point 1-16D (202G2V3), with a nominal capacity of 525 tons per hour; all constructed in 2001, equipped with one (1) fabric filter system (FF 1-16, baghouse 208L1) to control particulate emissions;
 - (ii) One (1) apron feeder, identified as Point 1-24 (202G2V1), with a nominal capacity of 600 tons per hour, constructed in 2001, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (iii) One (1) belt conveyor, identified as Point 1-25C (202G1V1); one (1) crusher, identified as Point 1-25D (202G1); one (1) belt conveyor, identified as Point 1-25E (202G1V2); and one (1) belt conveyor, identified as Point 1-25F (202GV2); each with a nominal capacity of 600 tons per hour, all constructed in 2001, equipped with one (1) fabric filter system (FF 1-25, baghouse 208L) to control particulate emissions; and
 - (iv) One (1) screen, identified as Point 1-26C (204G); one (1) belt conveyor, identified as Point 1-26D (202GV3); and one (1) belt conveyor, identified as Point 1-26E (202GV4); each with a nominal capacity of 600 tons per hour, all constructed in 2001, equipped with one (1) fabric filter system (FF 1-26, baghouse 210L) to control particulate emissions.
- (c) One (1) gypsum material handling process, constructed in 2002, with a nominal production of 150 tons per hour of the blended synthetic gypsum material, including the following units:
- (1) One (1) synthetic gypsum transporting system, identified as 1-20, with fugitive emissions;
 - (2) One (1) granulated slag/rock transporting system, identified as 1-31, with fugitive emissions;

- (3) One (1) outdoor gypsum storage pile, identified as 1-27, with a nominal storage capacity of 10,000 tons and a nominal throughput of 67,000 tons per year, using water suppression to control particulate emissions;
 - (4) One (1) outdoor granulated slag/rock storage pile, identified as 1-32, with a nominal storage capacity of 5,000 tons and a nominal throughput of 22,400 tons per year, using water suppression to control particulate emissions;
 - (5) One (1) synthetic gypsum hopper (230F), one (1) conveyor belt (230FV), and one (1) weigh belt (230V), all with a nominal throughput of 90 tons per hour; and one (1) conveyor belt (232V), with a nominal throughput of 120 tons per hour; all collectively identified as 1-34;
 - (6) One (1) granulated slag/rock hopper (231F), one (1) conveyor belt (231FV), and one (1) weigh belt (231V), collectively identified as 1-35, each with a nominal throughput of 30 tons per hour;
 - (7) One (1) enclosed pug mill (232L), identified as 1-36A, with a nominal throughput of 150 tons per hour, with particulate emissions controlled by Dust Collector (232FL), and exhausting through stack S1-36;
 - (8) One (1) CKD bin (232F) and one (1) discharge screw (232FV), identified as 1-36B and 1-36C, with a nominal throughput of 30 tons per hour, with particulate emissions controlled by Dust Collector (232FL), and exhausting through stack S1-36;
 - (9) Two (2) belt conveyors (233V, 233V1), identified as 1-41, for finished gypsum material, with a nominal throughput of 150 tons per hour;
 - (10) One (1) covered storage pile for finished gypsum material, identified as 1-37, with a nominal storage capacity of 5,000 tons and a nominal throughput of 112,000 tons per year; and
 - (11) One (1) finished gypsum material hopper (234F) and two (2) conveyor belts (234V, 234FV), identified as 1-38, with a nominal throughput of 150 tons per hour.
- (d) Raw Material Ball Mill Operation, with a nominal capacity of 360 tons of raw material per hour, including the following units:
- (1) Raw material ball mill transfer equipment including four (4) belt conveyors, identified as Point 1-17A (252V-255V); four (4) raw material bins, identified as Point 1-17B (350F-353F); all constructed April 1, 2000, with a nominal capacity of 525 tons per hour, equipped with one (1) fabric filter system (FF 1-17, baghouse 350L) to control particulate emissions;
 - (2) Four (4) weigh feeders, identified as Point 1-18A (350V-353V); one (1) conveyor belt, identified as Point 1-18B (358V); two (2) apron feeders, identified as Point 1-18C (350V1, 351V1); and two (2) scavenger conveyors, identified as Point 1-18D (350V2, 351V2); all constructed April 1, 2000, with a nominal capacity of 400 tons per hour; all utilizing a building enclosure to control particulate emissions;
 - (3) One (1) alleviator (357F), identified as Point 1-7, constructed April 1, 2000, with a nominal capacity of 20 tons per hour, equipped with one (1) fabric filter system (FF 1-7, baghouse 351L) to control particulate emissions.
- (e) Fly Ash Storage and Additive Activities, including the following units:
- (1) Two (2) screw conveyors, identified as Point 1-19A (273V, 274V); and two (2) fly ash hoppers, identified as Point 1-19B (273F, 273FA); all constructed April 1,

- 2000, and modified February 8, 2002, with exception of 273FA which was constructed in 2003, each with a nominal capacity of 20 tons per hour, equipped with one (1) fabric filter system (FF 1-20, 274L) to control particulate emissions;
- (2) One (1) fly ash silo, identified as Point 1-39 (270F), constructed April 1, 2000, with a nominal capacity of 1,250 tons, equipped with one (1) fabric filter system (FF 1-39, 270L) to control particulate emissions;
 - (3) One (1) fly ash silo, identified as Point 1-40 (271F), constructed April 1, 2000, with a nominal capacity of 1,250 tons, equipped with one (1) fabric filter system (FF 1-40, 271L) to control particulate emissions;
 - (4) Two (2) additive silos, identified as Point 1-21A (318F, 328F), each with a nominal capacity of 500 tons, four (4) rotary feeders, identified as Point 1-21B (318V, 318VV, 328V, 328VV), with a nominal capacity of 30 tons per hour each; all constructed May 17, 1996, equipped with one (1) fabric filter system (FF 1-21, baghouse 319L) to control particulate emissions;
 - (5) One (1) additive feed bin, identified as Point 1-22 (308F), constructed after August 17, 1971 and before May 17, 1996, with a nominal capacity of 200 tons, covered by a building enclosure (BE 1-22) to control particulate emissions; and
 - (6) Two (2) rotary feeders, identified as Point 1-23A (308V, 308VV), constructed in 1996; and one (1) weigh belt, identified as Point 1-23B (309V), constructed after August 17, 1971; each with a nominal capacity of 30 tons per hour, covered by a building enclosure (BE 1-23) to control particulate emissions.
- (f) Coal Mill Operation:
- (1) Coal storage piles, modified in 1999, utilizing building enclosures (BE 2-1) or compaction (CMP 2 16) to control particulate emissions;
 - (2) Coal transfer equipment:
 - (A) Four (4) vibrating feeders, identified as Point 2-2A (209V-211V, 213V); one (1) belt conveyor, identified as Point 2-2B (222V); and one (1) coal grizzly, identified as Point 2-2C (223V); all constructed before 1974 and modified in 1999, with a nominal capacity of 100 tons per hour each, utilizing water mist suppression or equivalent dust suppression to control particulate emissions and covered by a building enclosure (BE 2-2) to control particulate emissions;
 - (B) One (1) belt conveyor, identified as Point 2-4 (420V), constructed before 1974 and modified in 2000, with a nominal capacity of 100 tons per hour, covered by a building enclosure (BE 2-4) to control particulate emissions; and
 - (C) One (1) belt conveyor, identified as Point 2-6B (420V3), constructed May 1, 2000, with a nominal capacity of 100 tons per hour, equipped with one (1) shared fabric filter system (FF 2-6, baghouse 420L2) to control particulate emissions; and
 - (D) One (1) belt conveyor (420V1), constructed May 1, 2000, with a nominal capacity of 100 tons per hour, equipped with one (1) fabric filter system (baghouse 420L1) which exhausts into the building.
 - (3) Three (3) coal reject piles, identified as Points 2-3, 2-5, and 2-15, modified in 1999, utilizing mist suppression or equivalent dust suppression to control particulate emissions;

- (4) One (1) raw coal bin, identified as Point 2-9 (435F), constructed May 1, 2000, with a nominal capacity of 100 tons, equipped with one (1) fabric filter system (FF 2-9, baghouse 435L) to control particulate emissions;
 - (5) One (1) weigh feeder, identified as Point 2-10A (435V); and one (1) conveyor belt, identified as Point 2-10B (436V); all constructed May 1, 2000, each with a nominal capacity of 61 tons per hour, covered by a building enclosure (BE 2-10) to control particulate emissions;
 - (6) One (1) coal mill, identified as Point 2-11A (436G), with a nominal capacity of 40 tons of coal per hour, using a fuel oil fired burner during startup and clinker cooler gas at other times to remove moisture from the coal (Note: For the purposes of NSPS Subpart Y, this is also a thermal dryer); and three (3) screw conveyors, identified as Point 2-11B (436LV, 436L1V, 436GV1), each with a nominal capacity of 40 tons per hour; all constructed May 1, 2000, and equipped with one (1) fabric filter system (FF 2-11, baghouse 436L) to control particulate emissions; and
 - (7) Two (2) screw conveyors, identified as Point 2-13B (437V, 438V), with a nominal capacity of 40 tons per hour; two (2) rotary feeders, identified as Point 2-13C (436LVV, 436L1VV), with a nominal capacity of 40 tons per hour; and one (1) pulverized coal bin, identified as Point 2-13A (438F), with a nominal capacity of 100 tons; all constructed May 1, 2000, and equipped with one (1) fabric filter system (FF 2-13, baghouse 438L) to control particulate emissions.
- (g) One (1) alternate raw material feed system, approved for construction in 2007, operating at a maximum capacity of 20 tons per hour each, and consisting of the following pieces of equipment:
- (1) Slag pile, identified as one of the materials identified in Point 1-13, controlled with water mist spray as needed.
 - (2) One (1) slag hopper, identified as 289F, with emissions uncontrolled.
 - (3) One (1) weight feeder, identified as 289V, with emissions uncontrolled.
 - (4) Three (3) covered belt conveyors, identified as 290V, 291V, and 294V, exhausting to kiln stack 3-1. The exhaust from Stack 3-1 is controlled by electrostatic precipitator 402L.
 - (5) One (1) bucket elevator, identified as 292V, exhausting to kiln stack 3-1. The exhaust from Stack 3-1 is controlled by electrostatic precipitator 402L.
 - (6) Paved delivery roads with particulate emissions controlled by vacuum sweeping.
- (h) Kiln Operation, with a nominal capacity of 360 tons of dry raw feed per hour and 208 tons clinker per hour:
- (1) One (1) hammermill dryer, identified as Point 3-1C (440G), constructed May 1, 2000, with a nominal capacity of 258 tons per hour, equipped with one (1) electrostatic precipitator (402L) with a 2,000 HP motor to control particulate emissions, exhausting to stack 3-1;
 - (2) One (1) pre-heater, pre-calciner Portland cement kiln, originally constructed in 1966 and modified to the semi-dry system in 2000. The semi-dry kiln system includes one (1) coal-fired calciner tower with staged combustion, identified as Point 3-1B (440PH), and one (1) rotary kiln, identified as Point 3-1A (401B), with a combined nominal rated capacity of 827 million British thermal units per hour.

An oxygen enrichment system, constructed in 2006, introduces oxygen into the first stage pre-calciner and the front end of the rotary kiln. The semi-dry kiln system has a nominal rated clinker capacity of 208 tons per hour, using coal and the following supplemental fuel:

- (A) Hazardous waste fuel at a maximum rate allowed by the approved Boiler and Industrial Furnace Permit required by 40 CFR 270;
- (B) plastic chips, carpet fibers, wood chips, chipped tires, toner, oil filter fluff, cosmetics, and seed corn;
- (C) petroleum coke; and
- (D) distillate fuel for burner startup activities.

The particulate emissions from the calciner and kiln are controlled by one (1) electrostatic precipitator (402L) with a 2000 HP motor, exhausting to stack 3-1;

- (3) Nine (9) screw conveyors, identified as Point 3-1D (403V-410V, 404FV), constructed in 1968 and modified in 1999; and one (1) kiln dust chamber, identified as Point 3-1F (401BF1), constructed January 1, 1969; each with a nominal capacity of 10 tons per hour; with particulate emissions controlled by one (1) electrostatic precipitator (402L) with a 2000 HP motor, exhausting to stack 3-1;
- (4) One (1) return dust bin, identified as Point 3-3A (405F), constructed before 1971 and modified in 1999, with a nominal capacity of 100 tons; one (1) waste dust bin, identified as Point 3-3F (404F), constructed before 1971 and modified in 1999, with a nominal capacity of 75 tons; one (1) hopper, identified as Point 3-3C (445F), constructed May 1, 2000, with a nominal capacity of 60 tons per hour; two (2) bucket elevators, identified as Point 3-3G (411V, 413V), constructed before August 17, 1971, with a nominal capacity of 60 tons per hour; and one (1) rotary feeder, identified as Point 3-3H (405FVV) and one (1) screw conveyor, identified as Point 3-3I (405FVV1), both constructed in 2003, each with a nominal capacity of 60 tons per hour; all equipped with one fabric filter system (FF 3-3, baghouse 403L) to control particulate emissions;
- (5) One (1) non-routine raw material dust truck loading station, constructed before 1971 and modified in 1999, covered by a building enclosure (BE 3-25) to control particulate emissions;
- (6) One (1) conditioning tower, identified as Point 3-5A (480F), with a nominal capacity of 40 tons per hour, using lime injection to control sulfur dioxide emissions; and one (1) alkali bypass system, identified as Point 3-5B, one (1) hopper, identified as Point 3-5C (484F), with a nominal capacity of 10 tons per hour; one (1) dust cyclone, identified as Point 3-5D (480FL), with a nominal capacity of 31 tons per hour; four (4) screw conveyors, identified as Point 3-5E (480LV1-LV3, 480V), each with a nominal capacity of 10 tons per hour; one (1) weigh hopper, identified as Point 3-5I (481FF); and one (1) pug mill, identified as Point 3-5J (484L); all constructed May 1, 2000; and one (1) CKD loadout spout, identified as 481L, constructed in 2002; all equipped with one (1) fabric filter system (FF 3-5, baghouse 480L), which exhausts to stack 3-1, to control particulate emissions;
- (7) One (1) reject dust bin for cement kiln dust, identified as Point 3-7A (481F), with a nominal capacity of 150 tons, constructed May 1, 2000, equipped with one (1) fabric filter system (FF 3-7, baghouse 483L) to control particulate emissions;

- (8) One (1) alkali bypass system cement kiln dust truck loading station, identified as Point 3-8, constructed in 2000, utilizing mist suppression or equivalent dust suppression to control particulate emissions; and
 - (9) One (1) non-routine CKD loadout station, including one (1) screw conveyor, identified as Point 3-4B (412V), constructed in 2001, with a nominal capacity of 10 tons per hour, utilizing water mist suppression to control particulate emissions.
- (i) Clinker Cooler Operations, with a nominal capacity of 208 tons of clinker per hour:
- (1) One (1) clinker cooler, identified as Point 3-9A (401C), constructed before August 17, 1971 and modified in 2000, with a nominal capacity of 208 tons per hour; one (1) clinker breaker, identified as Point 3-9B (401CG), constructed January 1, 1969 and modified in 2000, with a nominal capacity of 208 tons per hour; one (1) dropout chamber, identified as Point 3-9C (401CL), constructed January 1, 1969, with a nominal capacity of 20 tons per hour; two (2) vibrating feeders, identified as Point 3-9F (427V, 428V), constructed before August 17, 1971 and modified in 2000, with a nominal capacity of 208 tons per hour each; and one (1) drag conveyor, identified as Point 3-9G (401CV), and eight (8) screw conveyors (422V, 470CV2, 470CV3, 470CV9, 470CV10, 474V-476V), all constructed before August 17, 1971 and modified in 2001, each with a nominal capacity of 10 tons per hour; all equipped with one (1) fabric filter system (FF 3-9, baghouse 471-CL) to control particulate emissions, exhausting to stack 3-2;
 - (2) Two (2) belt conveyors, identified as Point 3-11A (421V, 509V); and two (2) bucket elevators, identified as Point 3-11B (418V, 419V); all constructed before 1971 and modified in 2000, with a nominal capacity of 208 tons per hour each (note that belt conveyor (421V) is a non-routine belt). Particulate emissions from 421V, 418V, and 419V are controlled by the one (1) fabric filter system (FF 3-9, baghouse 471-CL). Particulate emissions from 509V are controlled by the one (1) fabric filter system (FF 3-11, baghouse 406L). If needed, particulate emissions from 418V can also be controlled by the one (1) fabric filter system (FF 3-11, baghouse 406L);
 - (3) One (1) non-routine outdoor clinker pile, identified as Point 3-13, modified in 1999, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (4) One (1) belt conveyor (turning tower), identified as Point 3-12 (510V), constructed before 1971 and modified in 2000, with a nominal capacity of 208 tons per hour, equipped with one (1) fabric filter system (FF 3-12, baghouse 506L) to control particulate emissions;
 - (5) One (1) bucket elevator, identified as Point 3-22 (500V), constructed October 1, 1999, with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 3-22, baghouse 500L) to control particulate emissions;
 - (6) Two (2) feeders, identified as Point 3-24A (207F, 208F); and one (1) belt conveyor, identified as Point 3-24B (219V); each constructed before August 17, 1971, with a nominal capacity of 300 tons per hour each, equipped with one (1) fabric filter system (FF 3-24, baghouse 220L) to control particulate emissions;
 - (7) Seven (7) clinker silos, identified as Point 3-14 (501A-507A), constructed before 1971 and modified in 1999, each with a nominal capacity of 5000 tons, equipped with one (1) fabric filter system (FF 3-14, baghouse 503L) to control particulate emissions;
 - (8) One (1) belt conveyor, identified as Point 3-21 (220V), constructed before August 17, 1971, and one (1) belt scale, constructed in 2003, with a nominal capacity of

300 tons per hour, equipped with one (1) fabric filter system (FF 3-21, baghouse 221L) which was installed in 2001 to control particulate emissions;

- (9) One (1) clinker resizing operation, identified as Point 3-24, constructed in 2003, operating parallel to existing clinker feeders and a clinker belt conveyor, comprised of the following activities and facilities:
- (A) One (1) loader haul operation, identified as Unit #2 (F3-32), with fugitive emissions;
 - (B) One (1) vibrating feeder, identified as Unit #2 (F3-33), with a nominal throughput of two hundred fifty (250) tons per hour of weathered clinker, with emissions uncontrolled;
 - (C) One (1) jaw crusher, identified as Unit #3, with a nominal throughput of two hundred fifty (250) tons per hour of weathered clinker, with emissions controlled by Dust Collector #1, exhausting to stack S3-34; and
 - (D) Two (2) belt conveyors, identified as Unit #4 and Unit #5, operating in series, feeding existing belt 3-21 (220V), each with a nominal throughput of two hundred fifty (250) tons per hour, with emissions controlled by Dust Collector #1, exhausting to stack S3-34.

(j) Finish Mill Operations:

- (1) Four (4) vibrating feeders, identified as Point 3-15 (504V-507V), constructed before 1971 and modified in 1999, with a nominal capacity of 250 tons per hour each, equipped with one (1) fabric filter system (FF 3-15, baghouse 505L) to control particulate emissions;
- (2) Four (4) vibrating feeders, identified as Point 3-17A (501V-503V, 508V); and one (1) belt conveyor, identified as Point 3-17B (221V); with a nominal capacity of 250 tons per hour each; all constructed before 1971 and modified in 1999, equipped with one (1) fabric filter system (FF 3-17, baghouse 504L) to control particulate emissions;
- (3) Two (2) belt conveyors, identified as Point 3-20B (514V, 511V), constructed before August 17, 1971; one (1) bucket elevator, identified as Point 3-20A (513V), constructed June 1, 2000; and one (1) belt conveyor, identified as 511V2, constructed in 2003; each with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 3-20, baghouse 513L) to control particulate emissions;
- (4) One (1) belt conveyor, identified as Point 4-13A (515V), constructed in 1969 and modified in 2000, with a nominal capacity of 250 tons per hour; and four one (1) silos, identified as Point 4-13B (650A-653A) (652), constructed January 1, 1969, with a nominal capacity of 2,440, 2,315, 2,260, and 200 tons respectively, equipped with one (1) fabric filter system (FF 4-13, baghouse 515L) to control particulate emissions. The three (3) silos, 650A, 651A, and 653A, with a nominal capacity of 2,440, 2,315, and 200 tons, respectively, constructed in 1969, and controlled by baghouses 760L, 761L, and 762L (constructed in 2006), respectfully to control particulate emissions. The three (3) silos, 650A, 651A, and 653A, with a nominal capacity of 2,440, 2,315, and 200 tons, respectively, constructed in 1969, and controlled by baghouses 760L, 761L, and 762L (constructed in 2006), respectfully to control particulate emissions;
- (5) One (1) belt conveyor, identified as Point 4-14 (516V), constructed January 1, 1969, with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 4-14, baghouse 516L) to control particulate emissions;

- (6) No. 1 Finish Mill, modified in 1993, with a nominal capacity of 70 tons of clinker per hour:
- (A) Two (2) belt conveyors, identified as Point 4-1A (639V, 640V), constructed in 1971 and modified in 1999, with a nominal capacity of 250 tons per hour each; one (1) clinker bin, identified as Point 4-1B (601F), constructed before 1971 and modified in 1999, with a nominal capacity of 260 tons; one (1) gypsum bin, identified as Point 4-1C (603F), constructed before 1971 and modified in 1999, with a nominal capacity of 240 tons per hour; one (1) spill screw, identified as Point 4-1D (646V), constructed in 2002, with a nominal capacity of 5 tons per hour; and one (1) belt conveyor, identified as 614V, modified in 2003, with a maximum capacity of 250 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-1, baghouse 617L) to control particulate emissions;
 - (B) One (1) No. 1 finish mill, identified as Point 4-2A (603G), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; one (1) elevator, identified as Point 4-2B (626V), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; and one (1) spill screw, identified as Point 4-2D (642V), constructed 1969 and modified in 1999, with a nominal capacity of 5 tons per hour; all equipped with one (1) fabric filter system (FF 4-2, baghouse 613L) to control particulate emissions;
 - (C) One (1) air separator, identified as Point 4-3A (605G), constructed in 1994 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) tailing screw, identified as Point 4-3D (613V), constructed in 1969 and modified in 1999, with a nominal capacity of 200 tons per hour; two (2) cement coolers, identified as Point 4-3E (603C, 604C), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour each; one (1) F.K. pump hopper, identified as Point 4-3G (611F), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; one (1) mill feed belt, identified as Point 4-3H (641V), constructed in 1974 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; and one (1) clinker F.O.W. belt, identified as Point 4-3I (601V), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons per hour; equipped with one (1) fabric filter system (FF 4-3, baghouse 606L) to control particulate emissions;
 - (D) One (1) fringe bin for off specification cement and cement kiln dust, identified as Point 4-16A (604F), constructed before August 17, 1971, with a nominal capacity of 66 tons; and two (2) screw feeders, identified as Point 4-16B (611V, 604F1V), constructed January 1, 1969, with a nominal capacity of 20 tons per hour each; equipped with one (1) fabric filter system (FF 4-16, baghouse 605L) to control particulate emissions; and
 - (E) One (1) weigh belt, identified as Point 4-15A (605V), and one (1) belt conveyor, identified as Point 4-15B (616V), constructed before 1974, covered by a building enclosure to control particulate matter;
- (7) No. 2 Finish Mill, with a capacity of 70 tons of clinker per hour:
- (A) Two (2) conveyor belts, identified as Point 4-4A (639V, 640V), constructed 1969 and modified in 1999, with a nominal capacity of 250 tons per hour; one (1) clinker bin, identified as Point 4-4B (602F), constructed before 1971 and modified in 1999, with a nominal capacity of 260 tons; one (1) gypsum bin, identified as Point 4-4C (603F),

- constructed before 1971 and modified in 1999, with a nominal capacity of 240 tons; one (1) clinker F.O.W. belt, identified as Point 4-4D, (602V), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons per hour; and one (1) feed belt, identified as Point 4-4E (644V), constructed in 1975 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-4, 636L) to control particulate emissions;
- (B) One (1) No. 2 finish mill, identified as Point 4-5A (602G), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; and one (1) spill screw, identified as Point 4-5B (645V), constructed in 1969 and modified in 1999, with a nominal capacity of 5 tons per hour; all equipped with one (1) fabric filter system (FF 4-5, baghouse 603L) to control particulate emissions; and
- (C) One (1) air separator, identified as Point 4-6A (604G), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) elevator, identified as Point 4-6B (621V), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) tailing screw, identified as Point 4-6D (612V), constructed in 1969 and modified in 1999, with a nominal capacity of 200 tons per hour; two (2) cement coolers, identified as Point 4-6E (601C, 602C), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour each; one (1) F.K. pump hopper, identified as Point 4-6F (610F), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; and one (1) mill feed belt, identified as Point 4-6G (644V), constructed in 1975 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-6, baghouse 602L) to control particulate emissions;
- (8) No. 3 Finish Mill, with a nominal capacity of 95 tons of clinker per hour:
- (A) One (1) No. 3 finish mill, identified as Point 4-9 (660G), constructed June 1, 2000, with a nominal capacity of 95 tons of clinker per hour, equipped with one (1) fabric filter system (FF 4-9, baghouse 660L) to control particulate emissions;
- (B) One (1) hopper, identified as Point 4-10C (667F), with a nominal capacity of 95 tons of clinker per hour; one (1) cooler, identified as Point 4-10D (664C), with a nominal capacity of 95 tons of clinker per hour; and one (1) feed belt, identified as Point 4-10E (654V), with a nominal capacity of 95 tons of clinker per hour; all constructed June 1, 2000, equipped with one (1) fabric filter system (FF 4-10, baghouse 661L) to control particulate emissions;
- (C) One (1) fringe bin for off specification cement and cement kiln dust, identified as Point 4-11B (665F), with a nominal capacity of 80 tons; one (1) elevator, identified as Point 4-11C (661V), with a nominal capacity of 230 tons per hour; and one (1) rotary feeder, identified as Point 4-11D (665FV), with a nominal capacity of 50 tons per hour; all constructed June 1, 2000 and equipped with one (1) fabric filter system (FF 4-11, baghouse 665L) to control particulate emissions;
- (D) One (1) air separator, identified as Point 4-12A (664G), constructed June 1, 2000, with a nominal capacity of 230 tons per hour, and equipped with one (1) fabric filter system (FF 4-12, baghouse 664L) to control particulate emissions; and

- (E) Two (2) weigh feeders, identified as Point 4-17 (652V, 653V), constructed January 1, 1969; and two (2) weigh feeders (650V, 651V), constructed January 1, 1969, equipped with two (2) dust collectors (650L, 651L), installed in 2000, venting indoors; with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 4-17) to control particulate emissions.
- (k) Cement Storage, Loading, and Packaging Activities:
- (1) Three (3) Group 5 silos, identified as Point 5-1 (705A, 707A, 709A), constructed before 1971 and modified in 1999, with a nominal storage capacity of 10,000 tons each, with particulate emission controlled by one (1) fabric filter system (FF 5-1, baghouse 757L);
 - (2) Three (3) Group 5 silos, identified as Point 5-2 (706A, 708A, 710A), constructed before 1971 and modified in 1999, with a nominal storage capacity of 10,000 tons each, with particulate emissions controlled by one (1) fabric filter systems (FF 5-2, baghouse 758L);
 - (3) Two (2) Group 4 silos, identified as Point 5-3 (702A, 704A), constructed in 1967 and modified in 1999, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-3, baghouse 702L);
 - (4) Two (2) Group 4 silos, identified as Point 5-4 (701A, 703A), constructed in 1967 and modified in 1999, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-4, baghouse 701L);
 - (5) Two (2) silos, identified as Point 5-29 (711A, 712A), constructed in January 1, 1969, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-29, baghouse 713L);
 - (6) One (1) screen, identified as Point 5-5C (701G), constructed before 1971 and modified in 1999; and one (1) truck loader, identified as Point 5-5D (708L), constructed before 1971 and modified in 1999; each with a nominal capacity of 500 tons per hour, equipped with one (1) fabric filter system (FF 5-5, baghouse 703L) to control particulate emissions;
 - (7) One (1) screen, identified as Point 5-6B (702G), constructed before 1971 and modified in 1999; and one (1) railcar/truck loader, identified as Point 5-6C (709L), constructed before 1971 and modified in 1999; each with a nominal capacity of 500 tons per hour, equipped with one (1) fabric filter system (FF 5-6, baghouse 706L) to control particulate emissions;
 - (8) One (1) hopper, identified as Point 5-7B (701F), constructed before 1971 and modified in 1999, with a nominal capacity of 40 tons per hour, equipped with one (1) fabric filter system (FF 5-7, baghouse 710L) to control particulate emissions;
 - (9) One (1) hopper, identified as Point 5-8 (730F), constructed before 1971 and modified in 1999, with a nominal capacity of 40 tons per hour, equipped with one (1) fabric filter system (FF 5-8, baghouse 715L) to control particulate emissions;
 - (10) Three (3) screw conveyors, identified as Point 5-9A (809V, 809V1, 809V2), constructed before 1971, with a nominal capacity of 40 tons per hour each; one (1) alleviator, identified as Point 5-9C, constructed before 1971, with a nominal capacity of 40 tons per hour; and fourteen (14) Group 2 silos, identified as Point 5-9B (2S-7S, 9S, 11S-17S), constructed in 1924, with a combined nominal

capacity of 24,842 tons; all equipped with one (1) fabric filter (FF 5-9, baghouse 808L) to control particulate matter;

- (11) One (1) silo, identified as Point 5-10 (8S), constructed in 1924 and modified in 1999, with a nominal capacity of 5420 tons, equipped with one (1) fabric filter system (FF 5-10, baghouse 807L) for particulate control;
- (12) One (1) silo, identified as Point 5-11 (10S), constructed in 1924 and modified in 1999, with a nominal capacity of 5420 tons, equipped with one (1) fabric filter system (FF 5-11, baghouse 810L) for particulate control;
- (13) Four (4) Group 3 silos, identified as Point 5-13 (26S, 27S, 28S, and 29S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,736 tons each, equipped with one (1) fabric filter system (FF 5-13, baghouse 27DC) to control particulate emissions;
- (14) Three (3) Group 3 silos, identified as Point 5-14 (18S, 20S, 22S), constructed in 1924 and modified in 1999, with a nominal capacity of 3,112 tons each, equipped with one (1) fabric filter system (FF 5-14, baghouse 22DC) to control particulate emissions;
- (15) Two (2) Group 3 silos, identified as Point 5-15 (24S, 30S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,780 tons each, equipped with one (1) fabric filter system (FF 5-15, baghouse 24DC) to control particulate emissions;
- (16) Four (4) Group 3 silos, identified as Point 5-17 (19S, 21S, 23S, 25S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,736 tons each, equipped with one (1) fabric filter system (FF 5-17, baghouse 25DC) to control particulate emissions;
- (17) One (1) screens elevator, identified as Point 5-18 (829V2), constructed before 1971, with a nominal capacity of 40 tons per hour, covered by a building enclosure (BE 5-18) to control particulate emissions;
- (18) One (1) elevator, identified as Point 5-19 (829V1), constructed before 1971, with a nominal capacity of 40 tons per hour, covered by a building enclosure (BE 5-19) to control particulate emissions;
- (19) Two (2) bulk tanks, identified as Point 5-23A (831F, 833F), with a nominal capacity of 20 tons each; and one (1) truck loader, identified as Point 5-23C, with a nominal capacity of 40 tons per hour; all constructed before 1971 and modified in 1999, except for 831V2 which was constructed in 2003, and equipped with one (1) fabric filter system (FF 5-23, baghouse 833L) to control particulate emissions;
- (20) Three (3) bulk tanks, identified as Point 5-24A (832F, 834F, 835F), with a nominal capacity of 20 tons each, constructed before 1950 and modified in 1999, and equipped with one (1) fabric filter system (FF 5-24, baghouse 835L) to control particulate emissions;
- (21) One (1) silo, identified as Point 5-26A (782F), with a nominal capacity of 2,430 tons; and one (1) bucket elevator, identified as Point 5-26B (781V), with a nominal capacity of 500 tons per hour; all constructed December 1, 2000, and equipped with one (1) fabric filter system (FF 5-26, baghouse 782L) to control particulate emissions;
- (22) One (1) lump breaker, identified as Point 5-27B (783V3); one (1) spout, identified as Point 5-27C (785L); and one (1) truck loader, identified as Point 5-27D; all constructed December 1, 2000, with a nominal capacity of 500 tons per hour

- each, and equipped with one (1) fabric filter system (FF 5-27, baghouse 783L) to control particulate emissions;
- (23) One (1) lump breaker, identified as Point 5-28B (784V3); one (1) spout, identified as Point 5-28C (786L); and one (1) truck loader, identified as Point 5-28D; all constructed December 1, 2000, with a nominal capacity of 500 tons per hour each, and equipped with one (1) fabric filter system (FF 5-28, baghouse 784L) to control particulate emissions;
 - (24) Five (5) screw conveyors, identified as Point 5-30B (755V, 759V-762V), constructed in 1978; six (6) rotary feeders, identified as Point 5-30C (755M-760M), constructed in 1978; and one (1) hopper, identified as Point 5-30D (750F), constructed before August 17, 1971; with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 5-30) to control particulate emissions; and
 - (25) Nineteen (19) screw conveyors, identified as Point 5-33A (818V1-825V1, 818V2-825V2, 828V1, 828V2, 830V); and three (3) screen screws, identified as Point 5-33B (806V, 829V4, 830V1); all constructed before 1950, with a nominal capacity of 40 tons per hour each, and covered by a building enclosure (BE 5-33) to control particulate emissions.
- (l) One (1) blend facility, consisting of the following units:
- (1) Five (5) screw conveyors, identified as Point 5-35A (22SC, 24SCG, 24SC, 30SC, 31SC), all constructed in 1989, with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 5-35) to control particulate emissions;
 - (2) One (1) transfer pod, identified as Point 5-36 (22) constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-36, filter 22-PVDC) to control particulate emissions;
 - (3) One (1) transfer pod, identified as Point 5-37 (24-G), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-37, filter 24-PVDC-G) to control particulate emissions;
 - (4) One (1) transfer pod, identified as Point 5-38 (24), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-38, filter 24-PVDC) to control particulate emissions;
 - (5) One (1) transfer pod, identified as Point 5-39 (30), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-39, filter 30-PVDC) to control particulate emissions;
 - (6) One (1) receiving tank, identified as Point 5-40, constructed in August 1989, with a nominal capacity of 20 tons, equipped with one (1) fabric filter system (FF 5-40, baghouse 40-DC) to control particulate emissions;
 - (7) One (1) blending tank, identified as Point 5-41A, with a nominal capacity of 20 tons; and one (1) blending pod, identified as Point 5-41C, with a nominal capacity of 25 cubic feet; all constructed in August 1989, equipped with one (1) fabric filter system (FF 5-41, baghouse 41-DC) to control particulate emissions;
 - (8) Two (2) silos, identified as Point 5-42 (50S, 51S), constructed August 1989, with a nominal capacity of 175 tons each, equipped with one (1) fabric filter system (FF 5-42, baghouse 50-DC) to control particulate emissions;

- (9) Two (2) silos, identified as Point 5-43 (52S, 53S), constructed August 1989, with a nominal capacity of 175 tons each, equipped with one (1) fabric filter system (FF 5-43, baghouse 53-DC) to control particulate emissions; and
 - (10) One (1) transfer pod, identified as Point 5-44B (50PV), constructed in August 1989, with a nominal capacity of 40 tons per hour each, equipped with one (1) fabric filter system (FF 5-44, filter 50-PVDC) to control particulate emissions.
- (m) Packhouse operations consisting of the following:
- (1) One (1) elevator, identified as Point 6-1A (838V), constructed in 1945; one (1) packer bin, identified as Point 6-1B (Bin #1), constructed in 1946; one (1) packing machine, identified as Point 6-1C (842LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-1D (842F, 842FA), constructed in 1946; two (2) rotary feeders, identified as Point 6-1E (842M, 842MA), constructed in 1946; and four (4) screw conveyors, identified as Point 6-1F (842LV1, 837V, 837V1, 831V2), constructed in 1945; all modified in 1999, with a nominal capacity of 34 tons per hour, and equipped with one (1) fabric filter system (FF 6-1, baghouse 842L) for particulate control;
 - (2) One (1) elevator, identified as Point 6-2A (838V1), constructed in 1945; one (1) packer bin, identified as Point 6-2B (Bin #2), constructed in 1946; one (1) packing machine, identified as Point 6-2C (843LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-2D (843F, 843FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-2E (843M, 843MA), constructed before 1971; and four (4) screw conveyors (843LV1, 817V1, 817V3, 817V7), identified as Point 6-2G; constructed in 1945; all modified in 1999, with a nominal capacity of 46 tons per hour, and equipped with one (1) fabric filter system (FF 6-2, baghouse 843L) for particulate control;
 - (3) One (1) elevator, identified as Point 6-3A (838V2), constructed in 1945; one (1) packer bin, identified as Point 6-3B (Bin #3), constructed in 1946; one (1) packing machine, identified as Point 6-3C (844LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-3D (844F, 844FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-3E (844M, 844MA), constructed before 1971; and one (1) screw conveyor, identified as Point 6-3F (844LV1), constructed before 1971; all modified in 1999, with a nominal capacity of 65 tons per hour, and equipped with one (1) fabric filter system (FF 6-3, baghouse 844L) for particulate control;
 - (4) One (1) elevator, identified as Point 6-4A (838V3), constructed in 1945; one (1) packer bin, identified as Point 6-4B (Bin #4), constructed in 1946; one (1) packing machine, identified as Point 6-4C (845LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-4D (845F, 845FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-4E (845M, 845MA), constructed before 1971; and one (1) screw conveyor, identified as Point 6-4F (845LV1), constructed before 1971; all modified in 1999, with a nominal capacity of 40 tons per hour, and equipped with one (1) fabric filter system (FF 6-4, baghouse 845L) for particulate control;
 - (5) Fourteen (14) conveyors, identified as Point 6-5 (842V-846V, 848V, 845V1, 847V1, 847V2, 848V1, 848V2, 849V1, 849V2, 849V3), constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6-5) to control particulate emissions;
 - (6) Two (2) palletizers, identified as Point 6-6 (900H, 901H), constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6-6) to control particulate emissions; and

- (7) One (1) truck loader, identified as Point 6-7, constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6 7) to control particulate emissions.
- (n) Eight (8) above-ground, liquid organic waste tanks, identified as Tanks 1-8, all constructed in 1988, except for Tank 8 (Burn Tank #8) which was constructed in 1999, with a combined nominal storage capacity of 400,000 gallons, with VOC and HAP emissions controlled by an existing vapor balancing system and a closed vent, carbon adsorption vapor system that exhaust to the existing tank farm stack identified as S-001.
- (o) One (1) truck unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.
- (p) One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (b) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent [326 IAC 6-3-2];
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2]; and
- (d) Conveyors as follows [326 IAC 6-3-2]:
 - (1) Covered conveyors for coal or coke conveying or less than or equal to 360 tons per day;
 - (2) Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983;
 - (3) Uncovered coal conveying of less than or equal to 120 tons per day; and
 - (4) Underground conveyors; and
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (f) One (1) non-hazardous waste alternate fuels handling process, identified as Point 2-18, approved for construction in 2007, with a maximum capacity of 10 tons of non-hazardous waste alternate fuel per hour, consisted of the following: [326 IAC 6-3-2]
 - (1) Two (2) hoppers, identified as 295F and 296F.

- (2) Two (2) screw conveyors, identified as 295V and 296V.
- (3) Two (2) weight feeders, identified as 295V1 and 296V1.
- (4) Three (3) covered drag chain conveyors, identified as 296DCC, 297DCC, and 298DCC.
- (5) Two (2) bucket elevators, identified as 296BE and 297BE.
- (g) Storage piles for non-hazardous waste alternate fuels, located inside a three-sided building, with a total maximum throughput rate of 10 tons/hr. [326 IAC 6-4]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T133-6927-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "Responsible Official" of truth, accuracy, and completeness. This certification shall

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

- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "Responsible Official" is defined at 326 IAC 2-7-1(34).

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

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

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

and

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

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

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

The PMP extension notification does not require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

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

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

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

- (a) All terms and conditions of permits established prior to T133-6927-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue

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

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

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

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

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

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to

326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

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

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

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

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

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 19, 1997. The plan is included as Attachment A.

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.

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 the "Responsible Official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.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 the "Responsible Official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 2-7-5(1)][326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(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 the "Responsible Official" as defined by 326 IAC 2-7-1(34).

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

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

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment.
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
 - (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
 - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
 - (3) Method 9 readings may be discontinued once a COMS is online.
 - (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, 40 CFR 63, Subpart LLL (for Clinker coolers), and 40 CFR 63, Subpart EEE (for the kiln).

C.13 Maintenance of Continuous Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous emission monitoring systems (CEMS) and related equipment.
- (b) In the event that a breakdown of a continuous emission monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (c) Whenever a continuous emission monitor other than an opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, a calibrated backup CEMS shall be brought online within four (4) hours of shutdown of the primary CEMS, and shall be operated until such time as the primary CEMS is back in operation.
- (d) Nothing in this permit, shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 10-3.

C.14 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.15 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(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 2-7-5][326 IAC 2-7-6]

C.16 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 shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

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

within ninety (90) days after the issuance date of Significant Permit Modification No. 133-24198-00002.

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

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

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [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.18 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

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

C.20 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

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

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

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

(c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-3 (ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-3 (mm)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:

- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on

calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

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

C.23 NESHAP Notification and Reporting Requirements [40 CFR Part 63, Subparts A, and LLL]

The Permittee shall comply with all reporting provisions specified in 40 CFR Part 63, Subpart LLL, and in particular:

- (a) The Permittee shall submit an initial notification in accordance with 40 CFR 63.9(b) (Subpart A, General Provisions) immediately. In 40 CFR 63.9(b), the Permittee is required to provide the following information:
- (1) The name and address of the Permittee;
 - (2) The address (i.e., physical location) of the affected source;
 - (3) An identification of the relevant standard or other requirement, that is the basis of the notification and the source's compliance date;

- (4) A brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant, or if a definitive identification is not yet possible, a preliminary identification of each point of emission for each hazardous air pollutant; and
- (5) A statement of whether the affected source is a major source or an area source.
- (b) The Permittee shall submit a notification of performance tests, as required by 40 CFR 63.7 and 40 CFR 63.9(e).
- (c) The Permittee shall submit a notification of opacity and visible emission observations required by 40 CFR 63.1349 in accordance with 40 CFR 63.6(h)(5) and 40 CFR 63.9(f).
- (d) The Permittee shall submit notification, as required by 40 CFR 63.9(g), of the date that continuous emissions monitor performance evaluation required by 40 CFR 63.8(e) is scheduled to begin.
- (e) The Permittee shall submit notification of compliance status, as required by 40 CFR 63.9(h).
- (f) The notification(s) required in this section shall be submitted to:

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

and

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

Stratospheric Ozone Protection

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

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

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

SECTION D.1 FACILITY OPERATION CONDITIONS - QUARRY ACTIVITIES, RAW MATERIAL SIZING ACTIVITIES

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

- (a) Quarry Activities:
 - (1) Removal and transfer of overburden material, drilling and blasting of limestone, and loading of raw materials using mobile equipment.
- (b) Raw Material Sizing Activities:
 - (1) One (1) primary crusher, identified as Point 1-8 (201G); and one (1) vibrating feeder, identified as Point 1-9A (201V); both constructed in 1969, modified in 1999 and 1998, with a nominal capacity of 1300 tons of limestone per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (2) Outside storage piles, modified in 1999, utilizing water mist suppression or equivalent dust suppression to control particulate emissions; and
 - (3) Raw material sizing transfer equipment including:
 - (A) One (1) apron feeder, identified as Point 1-14 (206V), constructed in 1969 and modified in 1999, with a nominal throughput of 400 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (B) One (1) belt conveyor, identified as Point 1-9B (214V), constructed in 1969, with a nominal throughput of 1,300 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (C) Three (3) vibrating feeders, identified as Point 1-11 (202V-204V), all constructed in 1969 and modified in 1999, with a nominal capacity of 1,300 tons per hour, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (D) Three (3) belt conveyors, identified as Point 1-15 (215V, 305V, 251V), constructed in 1969, 1969, and 2000, respectively, with a nominal capacity of 1,300 tons per hour, equipped with one (1) fabric filter system (FF 1-15, baghouse 209L) to control particulate emissions; and
 - (E) One (1) secondary crusher system, identified as SC-1, constructed in 2001, with a nominal capacity of 600 tons of limestone and additives per hour, controlled by three baghouses (208L, 208L1, 210L), exhausting to three (3) stacks (208L, 208L1, 210L), respectively. The secondary crusher system is totally enclosed and consists of the following pieces of equipment:

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

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

- (i) One (1) belt conveyor, identified as Point 1-16A (202G2V2), with a nominal capacity of 525 tons per hour; one (1) screen, identified as Point 1-16B (205G), with a nominal capacity of 600 tons per hour; one (1) crusher, identified as Point 1-16C (202G2), with a nominal capacity of 525 tons per hour; one (1) belt conveyor, identified as Point 1-16D (202G2V3), with a nominal capacity of 525 tons per hour; all constructed in 2001, equipped with one (1) fabric filter system (FF 1-16, baghouse 208L1) to control particulate emissions;
- (ii) One (1) apron feeder, identified as Point 1-24 (202G2V1), with a nominal capacity of 600 tons per hour, constructed in 2001, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
- (iii) One (1) belt conveyor, identified as Point 1-25C (202G1V1); one (1) crusher, identified as Point 1-25D (202G1); one (1) belt conveyor, identified as Point 1-25E (202G1V2); and one (1) belt conveyor, identified as Point 1-25F (202GV2); each with a nominal capacity of 600 tons per hour, all constructed in 2001, equipped with one (1) fabric filter system (FF 1-25, baghouse 208L) to control particulate emissions; and
- (iv) One (1) screen, identified as Point 1-26C (204G); one (1) belt conveyor, identified as Point 1-26D (202GV3); and one (1) belt conveyor, identified as Point 1-26E (202GV4); each with a nominal capacity of 600 tons per hour, all constructed in 2001, equipped with one (1) fabric filter system (FF 1-26, baghouse 210L) to control particulate emissions.

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facilities listed in Condition D.1.2 except when otherwise specified in 40 CFR 60, Subpart OOO.

D.1.2 Particulate Matter Emission Limitation [326 IAC 12] [40 CFR 60, Subpart OOO]

Pursuant to 326 IAC 12 and 40 CFR Part 60, Subpart OOO (NSPS for Nonmetallic Mineral Processing Plants), the following facilities shall not exceed the following limitations:

Operations	Units	Emission Point	PM Emission Limit
Raw Material Sizing Activities	one (1) primary crusher (201G)one (1) vibrating feeder (201V)	Fugitive	15% Opacity
	one (1) apron feeder (206V)	Fugitive	10% Opacity
	three (3) vibrating feeders (202V-204V)	Fugitive	10% Opacity
	one (1) belt conveyor (251V)	FF 1-15 (209L)	0.022 gr/dscf 7% Opacity
Raw Material Sizing Activities	one (1) belt conveyor (202G2V2) one (1) screen (205G) one (1) crusher (202G2) one (1) belt conveyor (202G2V3)	FF 1-16 (208L1)	0.022 gr/dscf 7% Opacity

Operations	Units	Emission Point	PM Emission Limit
	one (1) apron feeder (202G2V1)	Fugitive	10% Opacity
	one (1) belt conveyor (202G1V1)	FF 1-25 (208L)	0.022 gr/dscf 7% Opacity
	one (1) crusher (202G1)		
	one (1) belt conveyor (202G1V2)		
	one (1) belt conveyor (202GV2)		
	one (1) screen (204G)	FF 1-26 (210L)	0.022 gr/dscf 7% Opacity
	one (1) belt conveyor (202GV3)		
	one (1) belt conveyor (202GV4)		

D.1.3 Particulate Matter Emission Limitation [326 IAC 2-2]

- (a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Emission Point	Filterable PM limits	Filterable PM10 Limits
one (1) belt conveyor (251V)	FF 1-15 (209L)	0.015 gr/dscf 1.60 lbs/hr	0.015 gr/dscf 1.60 lbs/hr

- (b) The total PM/PM10 emissions from baghouses 208L, 208L1, and 210L of the secondary crusher system (SC-1) shall be less than 0.0108 pounds per ton of input to SC-1. Combined with the throughput limit in Condition D.1.4(c), this is equivalent to 13.9 tons of PM and PM10 emissions per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (PSD) do not apply to the installation of the secondary crusher system (SC-1).

- (c) Pursuant to 326 IAC 2-2 (PSD BACT), the following units shall use water mist suppression or equivalent dust suppression for PM control:

outside storage piles;
 one (1) primary crusher, identified as Point 1-8 (201G);
 one (1) vibrating feeder, identified as Point 1-9A (201V);
 one (1) apron feeder, identified Point 1-14 (206V); and
 three (3) vibrating feeders, identified Point 1-11 (202V-204V).

D.1.4 Operation Standards [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the Permittee shall comply with the following throughput limitations:

- (a) The overburden removed from the quarry activities shall not exceed 1.2 million tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (b) The limestone input rate to the primary crusher shall not exceed 2,262,479 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (c) The total input of additives including slag, bottom ash, sand, shale, limestone and alternate raw materials to the secondary crusher system (SC-1) shall not exceed 2,574,685 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.1.5 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Process	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Raw Material Sizing Activities, excluding the units venting through baghouses 209L, 208L1, 208L, and 210L	1,300	81.0

NOTE: Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed that shown in this table, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

The limitations for these facilities were calculated using the following equations.

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.1.7 Particulate Matter (PM)

- (a) In order to comply with Conditions D.1.2, D.1.3, and D.1.5, the baghouses for PM/PM10 control associated with the raw material sizing activities shall be in operation and control emissions from the facilities at all times when the 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.

D.1.8 Water Spray Operating Condition

Pursuant to CP133-10159-00002, issued April 16, 1999, and in order to demonstrate compliance with Conditions D.1.2, D.1.3, and D.1.5, the water mist spray systems associated with the quarry activities and raw material sizing activities shall be operated on an as needed basis while its associated equipment is in operation and the temperature is above 35 degrees Fahrenheit.

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

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of baghouse exhausts (208L, 208L1, 209L, and 210L) shall be performed once per day 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 or 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.1.10 Parametric Monitoring

The Permittee shall continuously record the pressure drop across the baghouses (208L, 208L1, 209L, and 210L) used in conjunction with the raw material sizing activities when these units are in operation. The pressure gauges must be equipped with an alarm system that will alarm when the pressure drop across a baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test. When an alarm sounds, the baghouse interlock systems shall shut down the associated units automatically and the Permittee shall take reasonable response steps, in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.1.11 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Condition D.1.4, the Permittee shall maintain monthly records of the overburden removed from the quarry activities, the limestone input to the primary crusher, and the total input of raw materials to the secondary crusher system.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the baghouse stack exhausts. 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).
- (c) To document compliance with Condition D.1.10, the Permittee shall maintain continuous records of the pressure drop during normal operation, the dates and times of all alarms, the cause of each alarm, and an explanation of all corrective actions taken.

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

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS - GYPSUM MATERIAL HANDLING PROCESS, RAW MATERIAL BALL MILL OPERATION, FLY ASH STORAGE ACTIVITIES

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

- (c) One (1) gypsum material handling process, constructed in 2002, with a nominal production of 150 tons per hour of the blended synthetic gypsum material, including the following units:
- (1) One (1) synthetic gypsum transporting system, identified as 1-20, with fugitive emissions;
 - (2) One (1) granulated slag/rock transporting system, identified as 1-31, with fugitive emissions;
 - (3) One (1) outdoor gypsum storage pile, identified as 1-27, with a nominal storage capacity of 10,000 tons and a nominal throughput of 67,000 tons per year, using water suppression to control particulate emissions;
 - (4) One (1) outdoor granulated slag/rock storage pile, identified as 1-32, with a nominal storage capacity of 5,000 tons and a nominal throughput of 22,400 tons per year, using water suppression to control particulate emissions;
 - (5) One (1) synthetic gypsum hopper (230F), one (1) conveyor belt (230FV), and one (1) weigh belt (230V), all with a nominal throughput of 90 tons per hour; and one (1) conveyor belt (232V), with a nominal throughput of 120 tons per hour; all collectively identified as 1-34;
 - (6) One (1) granulated slag/rock hopper (231F), one (1) conveyor belt (231FV), and one (1) weigh belt (231V), collectively identified as 1-35, each with a nominal throughput of 30 tons per hour;
 - (7) One (1) enclosed pug mill (232L), identified as 1-36A, with a nominal throughput of 150 tons per hour, with particulate emissions controlled by Dust Collector (232FL), and exhausting through stack S1-36;
 - (8) One (1) CKD bin (232F) and one (1) discharge screw (232FV), identified as 1-36B and 1-36C, with a nominal throughput of 30 tons per hour, with particulate emissions controlled by Dust Collector (232FL), and exhausting through stack S1-36;
 - (9) Two (2) belt conveyors (233V, 233V1), identified as 1-41, for finished gypsum material, with a nominal throughput of 150 tons per hour;
 - (10) One (1) covered storage pile for finished gypsum material, identified as 1-37, with a nominal storage capacity of 5,000 tons and a nominal throughput of 112,000 tons per year; and
 - (11) One (1) finished gypsum material hopper (234F) and two (2) conveyor belts (234V, 234FV), identified as 1-38, with a nominal throughput of 150 tons per hour.

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

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

- (d) Raw Material Ball Mill Operation, with a nominal capacity of 360 tons of raw material per hour, including the following units:
- (1) Raw material ball mill transfer equipment including four (4) belt conveyors, identified as Point 1-17A (252V-255V); four (4) raw material bins, identified as Point 1-17B (350F-353F); all constructed April 1, 2000, with a nominal capacity of 525 tons per hour, equipped with one (1) fabric filter system (FF 1-17, baghouse 350L) to control particulate emissions;
 - (2) Four (4) weigh feeders, identified as Point 1-18A (350V-353V); one (1) conveyor belt, identified as Point 1-18B (358V); two (2) apron feeders, identified as Point 1-18C (350V1, 351V1); and two (2) scavenger conveyors, identified as Point 1-18D (350V2, 351V2); all constructed April 1, 2000, with a nominal capacity of 400 tons per hour; all utilizing a building enclosure to control particulate emissions;
 - (3) One (1) alleviator, identified as Point 1-7, constructed April 1, 2000, with a nominal capacity of 20 tons per hour, equipped with one (1) fabric filter system (FF 1-7, baghouse 351L) to control particulate emissions.
- (e) Fly Ash Storage Activities, including the following units:
- (1) Two (2) screw conveyors, identified as Point 1-19A (273V, 274V); and two (2) fly ash hoppers, identified as Point 1-19B (273F, 273FA); all constructed April 1, 2000 and modified February 8, 2002, with exception of 273FA which was constructed in 2003, each with a nominal capacity of 20 tons per hour, equipped with one (1) fabric filter system (FF 1-20, 274L) to control particulate emissions;
 - (2) One (1) fly ash silo, identified as Point 1-39 (270F), constructed April 1, 2000, with a nominal capacity of 1,250 tons, equipped with one (1) fabric filter system (FF 1-39, 270L) to control particulate emissions;
 - (3) One (1) fly ash silo, identified as Point 1-40 (271F), constructed April 1, 2000, with a nominal capacity of 1,250 tons, equipped with one (1) fabric filter system (FF 1-40, 271L) to control particulate emissions;
 - (4) Two (2) additive silos, identified as Point 1-21A (318F, 328F), each with a nominal capacity of 500 tons; four (4) rotary feeders, identified as Point 1-21B (318V, 318VV, 328V, 328VV), with a nominal capacity of 30 tons per hour each; all constructed May 17, 1996, equipped with one (1) fabric filter system (FF 1-21, baghouse 319L) to control particulate emissions;
 - (5) One (1) additive feed bin, identified as Point 1-22 (308F), constructed after August 17, 1971 and before May 17, 1996, with a nominal capacity of 200 tons, covered by a building enclosure (BE 1-22) to control particulate emissions; and
 - (6) Two (2) rotary feeders, identified as Point 1-23A (308V, 308VV), constructed in 1996; and one (1) weigh belt, identified as Point 1-23B (309V), constructed before August 17, 1971; each with a nominal capacity of 30 tons per hour, covered by a building enclosure (BE 1-23) to control particulate emissions.
- (o) One (1) truck unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.

(p) One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.

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

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

D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, except when otherwise specified in 40 CFR 63, Subpart LLL, to the gypsum material handling process, raw material ball mill operations, fly ash storage activities, truck unloading, and pneumatic transfer activities listed in Condition D.2.2.

D.2.2 Particulate Matter Emission Limitation [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63, Subpart LLL (NESHAP for the Portland Cement Manufacturing Industry), the following emission units are subject to 40 CFR 63, Subpart LLL, and the visible emissions from these units shall be less than 10 percent opacity:

Operations	Units	Emission Point
Synthetic Gypsum Material Handling Process	one (1) synthetic gypsum hopper (230F) one (1) conveyor belt (230FV) one (1) weigh belt (230V) one (1) conveyor belt (232V)	1-34
	one (1) granulated slag/rock hopper (231F) one (1) conveyor belt (231FV) one (1) weigh belt (231V)	1-35
	one (1) enclosed pug mill (232L) one (1) CKD bin (232F) one (1) discharge screw (232FV)	S1-36 (232FL)
	two (2) belt conveyors (233V, 233V1)	1-41
	one (1) finished gypsum material hopper (234F) two (2) conveyor belts (234V, 234FV)	1-38
Raw Material Ball Mill Operations	four (4) belt conveyors (252V-255V) four (4) raw material bins (350F-353F)	FF 1-17 (350L)
	four (4) weigh feeders (350V-353V) one (1) conveyor belt (358V) two (2) apron feeders (350V1, 351V1) two (2) scavenger conveyors (350V2, 351V2)	1-18
	one (1) alleviator	FF 1-7 (351L)
Fly Ash Storage Activities	two (2) screw conveyors (273V, 274V) two (2) fly ash hoppers (273F, 273FA)	FF 1-20 (274L)
	one (1) fly ash silo (270F)	FF 1-39 (270L)
	one (1) fly ash silo (271F)	FF 1-40 (271L)
	two (2) additive silos (318F, 328F) four (4) rotary feeders (318V, 318VV, 328V, 328VV)	FF 1-21 (319L)
	one (1) additive feed bin (308F)	BE 1-22
	two (2) rotary feeders (308V, 308VV) one (1) weigh belt (309V)	BE 1-23
Truck Unloading / Silo Loading	one (1) truck unloading, pneumatic conveying and silo (240F)	240L

Operations	Units	Emission Point
Pneumatic Transfer	one (1) pneumatic transfer (241F)	241L

D.2.3 Particulate Matter Emission Limitation [326 IAC 2-2]

(a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Emission Point	Filterable PM Limits	Filterable PM10 Limits
four (4) belt conveyors (252V-255V) four (4) raw material bins (350F-353F)	FF 1-17 (350L)	0.010 gr/dscf 1.08 lbs/hr	0.010 gr/dscf 1.08 lbs/hr
one (1) fly ash silo (270F) one (1) fly ash silo (271F)	FF 1-39 (270L) FF 1-40 (271L)	0.015 gr/dscf 0.11 lbs/hr (each)	0.015 gr/dscf 0.11 lbs/hr (each)

(b) Pursuant to 326 IAC 2-2 (PSD BACT), the following limitations apply to the following units:

Units	Emission Point	Filterable PM Limits	Filterable PM10 Limits
one (1) alleviator	FF 1-7 (351L)	0.010 gr/dscf 0.17 lbs/hr	0.010 gr/dscf 0.17 lbs/hr
two (2) screw conveyors (273V, 274V) two (2) fly ash hoppers (273F, 273FA)	FF 1-20 (274L)	0.010 gr/dscf 0.26 lbs/hr	0.010 gr/dscf 0.26 lbs/hr

(c) Pursuant to 326 IAC 2-2 (PSD BACT), the following units shall use a building enclosure as control:

- four (4) weigh feeders, identified as Point 1-18A (350V-353V);
- one (1) conveyor belt, identified as Point 1-18B (358V);
- two (2) apron feeders, identified as Point 1-18C (350V1, 351V1); and
- two (2) scavenger conveyors, identified as Point 1-18 D (350V2, 351V2).

(d) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

(1) The emissions from the gypsum material handling process shall be limited to the following:

Units	Emission Point	PM/PM10 Limits
one (1) synthetic gypsum hopper (230F) one (1) conveyor belt (230FV) one (1) weigh belt (230V) one (1) conveyor belt (232V)	1-34	0.24 lbs/hr
one (1) granulated slag/rock hopper (231F) one (1) conveyor belt (231FV) one (1) weigh belt (231V)	1-35	0.24 lbs/hr
one (1) enclosed pug mill (232L) one (1) CKD bin (232F) one (1) discharge screw (232FV)	S1-36 (232 FL)	0.45 lbs/hr
one (1) finished gypsum material hopper (234F) two (2) conveyor belts (234V, 234FV)	1-38	0.24 lbs/hr
two (2) belt conveyors (233V, 233V1)	1-41	0.24 lbs/hr.

This is equivalent to 6.18 tons/yr PM/PM10 emissions. Combined with the fugitive emissions from the gypsum material handling process, the total emissions from this process are less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to the gypsum material handling process when it was constructed.

(2) The emissions from the following units shall comply with the limitations listed in the table below:

Units	Emission Point	PM/PM10 Limits
two (2) additive silos (318F, 328F) four (4) rotary feeders (318V, 318VV, 328V, 328VV)	FF 1-21 (319L)	0.15 lbs/hr

Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable to the units listed in the table above.

- (e) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the following units shall use a building enclosure as control:
- one (1) additive feed bin (308F); and
 two (2) rotary feeders (308V, 308VV).
- (f) In order to render PSD not applicable to the modification permitted in MSM 133-25345-00002, the Permittee shall limit emissions as follows:
- (1) The throughput of spent pot liner shall be less than 35,040 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The PM10 emissions from the truck unloading operation (240F) shall be limited to less than 0.4 pounds per ton of material unloaded and transferred to the silo.
 - (3) The PM10 emissions from the enclosed pneumatic conveyance system (241F) shall be limited to less than 0.4 pounds per ton of material transferred to the kiln.

D.2.4 Operation Standards [326 IAC 2-2-3]

Pursuant to CP 133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2-3 (Prevention of Significant Deterioration BACT), the fly ash input rate to the kiln operations shall not exceed 135,289 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.2.5 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Operations	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Gypsum Material Handling Process	150	55.4
Raw Material Ball Mill Operations, excluding the units venting through baghouse 350L and 351L	400	66.3
Fly Ash Storage Activities, excluding the units venting through baghouse 270L, 271L, and 274L	30	40.0
Truck Unloading / Silo Loading	33	40.9
Pneumatic Transfer	4	10.4

NOTE: Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed that shown in this table, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

The limitations for these facilities were calculated using the following equations:

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices. If the Operations and Maintenance Plan required by Condition D.2.9 is developed in accordance with Section B - Preventive Maintenance Plan, then once the Operations and Maintenance Plan has been developed, it shall satisfy this condition.

Compliance Determination Requirements

D.2.7 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.2, D.2.3, and D.2.5, the baghouses for PM/PM10 control associated with the gypsum material handling process, the raw material ball mill operation, the fly ash storage activities and the dust collector and bin vent filter for the truck unloading and pneumatic transfer operations shall be in operation and control emissions from the facilities at all times when the 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.

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Conditions D.2.3(b) and D.2.3(d), no later than 180 days after issuance of this Part 70 permit, the Permittee shall perform PM and PM10 stack testing for one of the emission points listed in Conditions D.2.3(b) and all the emission points listed in D.2.3(d) utilizing methods as approved by the Commissioner. PM10 includes filterable PM10 and condensable PM10. Testing shall be conducted in accordance with Section C - Performance Testing.

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

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

Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall maintain a written operation and maintenance plan for the units listed in Condition D.2.2 by June 14, 2002, which is the compliance date for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry, or upon startup, whichever is later. The plan shall include the following information:

- (a) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emission limits in Condition D.2.2; and

- (b) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348. Such procedures must include the following provisions:
- (1) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source except for the raw mill (350G), in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
 - (2) If no visible emissions are observed in six consecutive monthly test for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (3) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (4) If visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40 CFR 60, Subpart A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.
 - (5) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
 - (6) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the Permittee shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of paragraphs (1) through (4) of this section for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (7) of this section.
 - (7) If visible emissions from a building are monitored, the requirements of paragraphs (1) through (4) of this section apply to the monitoring of the building, and the Permittee shall also test visible emissions from each side, roof and vent of the building for at least 1 minute. The test must be conducted under normal operating conditions.

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

D.2.10 Visible Emissions Notations

- (a) Visible emission notations of each baghouse associated with the synthetic gypsum material handling process (232FL), raw material ball mill operation (350L, 351L), the fly ash storage activities (274L, 270L, 271L, and 319L), and the truck unloading and pneumatic transfer operations (240L and 241L) stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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.2.11 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the synthetic gypsum material handling process, raw material ball mill operation, and fly ash storage activities at least once per day when those processes are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range listed below:

Baghouse	Pressure Drop (inches of water)
350L, 351L, 270L, 271L, 274L, 319L, 232FL	1-8

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.2.12 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 2-7-5(3)] [326 IAC 2-7-19]

D.2.13 Record Keeping Requirements

- (a) To document compliance with Condition D.2.4, the Permittee shall maintain records of the fly ash input to the kiln system in order to establish compliance with the limit established in Condition D.2.4.
- (b) To document compliance with Condition D.2.10, the Permittee shall maintain records of once per day visible emission notations of the synthetic gypsum material handling process, raw material ball mill operation, fly ash storage activities, truck unloading operations, and pneumatic transfer operations stack exhausts. 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).
- (c) To document compliance with Condition D.2.11, the Permittee shall maintain once per day records of the pressure drop across the baghouse. 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).
- (d) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
 - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
 - (A) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
 - (B) All records of applicability determination, including supporting analyses.
- (e) To document compliance with Condition D.2.3(f)(1), the Permittee shall maintain records of the throughput amount, in tons, of spent pot liner through the truck unloading operations.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
 - (1) The plan required by 40 CFR 63.1350 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry:

- (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
 - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
 - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
 - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317)233-0178 or facsimile (FAX) transmission at (317)233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (c) In addition to being submitted to the address listed in Section C - General Reporting Requirements, all reports and the operation and maintenance plan submitted pursuant to 40 CFR 63, Subpart A shall also be submitted to the U.S. EPA at the following address:
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- Pursuant to 40 CFR 63.10(d)(5)(i) and (ii), the reports submitted by the Permittee shall include the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (d) A quarterly summary of the information to document compliance with Condition D.2.3(f)(1) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

SECTION D.3 FACILITY OPERATION CONDITIONS - COAL MILL OPERATION

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

- (f) Coal Mill Operation:
- (1) Coal storage piles, modified in 1999, utilizing building enclosures (BE 2-1) or compaction (CMP 2-16) to control particulate emissions;
 - (2) Coal transfer equipment:
 - (A) Four (4) vibrating feeders, identified as Point 2-2A (209V-211V, 213V); one (1) belt conveyor, identified as Point 2-2B (222V); and one (1) coal grizzly, identified as Point 2-2C (223V); all constructed before 1974 and modified in 1999, with a nominal capacity of 100 tons per hour each, utilizing water mist suppression or equivalent dust suppression to control particulate emissions and covered by a building enclosure (BE 2-2) to control particulate emissions;
 - (B) One (1) belt conveyor, identified as Point 2-4 (420V), constructed before 1974 and modified in 2000, with a nominal capacity of 100 tons per hour, covered by a building enclosure (BE 2-4) to control particulate emissions; and
 - (C) One (1) belt conveyor, identified as Point 2-6B (420V3), constructed May 1, 2000, with a nominal capacity of 100 tons per hour, equipped with one (1) fabric filter system (FF 2-6, baghouse 420L2) to control particulate emissions; and
 - (D) One (1) belt conveyor (420V1), constructed May 1, 2000, with a nominal capacity of 100 tons per hour, equipped with one (1) fabric filter system (baghouse 420L1) which exhausts into the building.
 - (3) Three (3) coal reject piles, identified as Points 2-3, 2-5, and 2-15, modified in 1999, utilizing mist suppression or equivalent dust suppression to control particulate emissions;
 - (4) One (1) raw coal bin, identified as Point 2-9 (435F), constructed May 1, 2000, with a nominal capacity of 100 tons, equipped with one (1) fabric filter system (FF 2-9, baghouse 435L) to control particulate emissions;
 - (5) One (1) weigh feeder, identified as Point 2-10A (435V); and one (1) conveyor belt, identified as Point 2-10B (436V); all constructed May 1, 2000, each with a nominal capacity of 61 tons per hour, covered by a building enclosure (BE 2-10) to control particulate emissions;

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

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

- (6) One (1) coal mill, identified as Point 2-11A (436G), with a nominal capacity of 40 tons of coal per hour, using a fuel oil fired burner during startup and clinker cooler gas at other times to remove moisture from the coal (Note: For the purposes of NSPS Subpart Y, this is also a thermal dryer); and three (3) screw conveyors, identified as Point 2-11B (436LV, 436L1V, 436GV1), each with a nominal capacity of 40 tons per hour; all constructed May 1, 2000, and equipped with one (1) fabric filter system (FF 2-11, baghouse 436L) to control particulate emissions; and
- (7) Two (2) screw conveyors, identified as Point 2-13B (437V, 438V), with a nominal capacity of 40 tons per hour; two (2) rotary feeders, identified as Point 2-13C (436LVV, 436L1VV), with a nominal capacity of 40 tons per hour; and one (1) pulverized coal bin, identified as Point 2-13A (438F), with a nominal capacity of 100 tons; all constructed May 1, 2000, and equipped with one (1) fabric filter system (FF 2-13, baghouse 438L) to control particulate emissions.

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

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

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply except when otherwise specified in 40 CFR 60, Subpart Y, to the facilities described in Condition D.3.2.

D.3.2 Particulate Matter Emission Limitation [326 IAC 12] [40 CFR 60, Subpart Y]

Pursuant to 326 IAC 12 and 40 CFR Part 60, Subpart Y (NSPS for Coal Preparation Plants), the following emission units, which were constructed after October 24, 1974, are subject to 40 CFR 60, Subpart Y and shall comply with the following:

- (a) The visible emissions for the following units shall be less than 20 percent opacity:

Operations	Units	Emission Point
Coal Mill Operation	coal storage piles	BE 2-1
	four (4) vibrating feeders (209V-211V, 213V) one (1) belt conveyor (222V) one (1) coal grizzly(223V)	BE 2-2
	one (1) belt conveyor (420V)	BE 2-4
	one (1) belt conveyor (420V3)	FF 2-6 (420L2)
	one (1) belt conveyor (420V1)	420L1 (vent indoor)
	three (3) coal reject piles	2-3, 2-5, and 2-15
	one (1) raw coal bin (435F)	FF 2-9 (435L)
	one (1) weigh feeder (435V) one (1) conveyor belt (436V)	BE 2-10
	three (3) screw conveyor (436LV, 436L1V, 436GV1)	FF 2-11 (436L)
	two (2) screw conveyors (437V, 438V) two (2) rotary feeders (436LVV, 436L1VV) one (1) pulverized coal bin (438F)	FF 2-13 (438L)

- (b) The particulate matter emissions from the coal mill (2-11A, 436G) shall be less than 0.031 grains per dry standard cubic foot of exhaust air (0.070 g/dscf) and 20% opacity.

D.3.3 Particulate Matter Emission Limitation [326 IAC 2-2]

- (a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Point	Filterable PM limits	Filterable PM10 Limits
one (1) raw coal bin (435F)	FF 2-9 (435L)	0.010 gr/dscf 0.33 lbs/hr	0.010 gr/dscf 0.33 lbs/hr
one (1) coal mill (436G) three (3) screw conveyor (436LV, 436L1V, 436GV1)	FF 2-11 (436L)	0.010 gr/dscf 4.45 lbs/hr	0.010 gr/dscf 4.45 lbs/hr
two (2) screw conveyors (437V, 438V) two (2) rotary feeders (436LVV, 436L1VV) one (1) pulverized coal bin (438F)	FF 2-13 (438L)	0.010 gr/dscf 0.14 lbs/hr	0.010 gr/dscf 0.14 lbs/hr

- (b) Pursuant to 326 IAC 2-2 (PSD BACT), the following limitations apply to the following units:

Units	Point	Filterable PM Limits	PM10 Limits
one (1) belt conveyor (420V3)	FF 2-6 (420L2)	0.010 gr/dscf 0.17 lbs/hr	0.010 gr/dscf 0.17 lbs/hr
one (1) belt conveyor (420V1)	420L1 (vent indoor)	0.010 gr/dscf 0.17 lbs/hr	0.010 gr/dscf 0.17 lbs/hr

- (c) Pursuant to 326 IAC 2-2 (PSD BACT), the following emission units shall use the control methods listed in the table below:

Units	Control Method
coal storage piles	building enclosure (BE 2-1)
four (4) vibrating feeders (209V-211V, 213V) one (1) belt conveyor (222V) one (1) coal grizzly (223V)	building enclosure (BE 2-2)
one (1) belt conveyor (420V)	building enclosure (BE 2-4)
three (3) coal reject piles	water mist suppression or equivalent
one (1) weigh feeder (435V) one (1) conveyor belt (436V)	building enclosure (BE 2-10)

D.3.4 Operation Standards [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the coal input rate to the coal mill shall not exceed 313,552 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.3.5 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Processes	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Coal Mill Operation, excluding the units venting through baghouses 420L2, 20L1, 435L, 436L, and 438L	100	51.3

The limitation was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.3.6 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the coal mill's fuel oil-fired burner (2-11A, 436G) shall not exceed five tenths (0.5) pounds per MMBtu heat input from the combustion of fuel oil. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.3.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.3.8 Particulate Matter (PM) and PM10

- (a) In order to comply with Conditions D.3.2, D.3.3, and D.3.5, the baghouses for PM and PM10 control associated with the coal mill operation shall be in operation and control emissions from the facilities at all times when the 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.

D.3.9 Water Spray Operating Condition

Pursuant to CP133-10159-00002, issued April 16, 1999 and in order to demonstrate compliance with Conditions D.3.2, D.3.3, and D.3.5, the water mist spray systems associated with the coal mill operation shall be operated on an as needed basis while its associated equipment is in operation and the temperature is above 35 degrees Fahrenheit.

D.3.10 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11][40 CFR 60, Subpart Y]

- (a) In order to demonstrate compliance with Conditions D.3.2(b) and D.3.3(a) and pursuant to 40 CFR 60.254 and 40 CFR 60.11, no later than five (5) years from the last valid stack testing, the Permittee shall perform stack testing for the coal mill (436G) utilizing methods as approved by the Commissioner. These tests shall be repeated once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable PM10 only.
- (b) In order to demonstrate compliance with Condition D.3.3(b), no later than 180 days after issuance of this Part 70 permit, the Permittee shall perform PM and PM10 stack testing for one of the emission points listed in Condition D.3.3(b) utilizing methods as approved by the Commissioner. PM10 includes filterable PM10 and condensible PM10.

Testing shall be conducted in accordance with Section C - Performance Testing.

D.3.11 Sulfur Dioxide Emissions and Sulfur Content

Compliance with the limit in Condition D.3.6 shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the sulfur dioxide emissions from the coal mill's fuel oil-fired burner do not exceed five-tenths (0.5) pounds per million Btu heat input by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification, or;
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the coal mill's fuel oil-fired burner during startup, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

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

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

D.3.12 Visible Emissions Notations

- (a) Visible emission notations of each baghouse associated with the coal mill operation stack exhausts (420L2, 435L, 436L, 438L), shall be performed once per day 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 or 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.3.13 Temperature Monitoring [326 IAC 12] [40 CFR 60, Subpart Y]

Pursuant to 40 CFR 60.253, the Permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the temperature of the gas stream at the exit of the coal mill (2-11A, 436G) on a continuous basis. The monitoring device is to be certified by the manufacturer and be accurate within plus or minus 3 degrees Fahrenheit. The monitoring device shall be calibrated annually in accordance with the procedures specified in 40 CFR 60.13(b).

D.3.14 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses at least once per day for baghouses 420L2, 435L, 436L, and 438L when the coal mill operation is in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range listed below:

Baghouse	Pressure Drop (inches of water)
436L, 438L	1-8
420L2, 435L	0.1-4

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.3.15 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 2-7-5(3)] [326 IAC 2-7-19]

D.3.16 Record Keeping Requirements

- (a) To document compliance with Condition D.3.4, the Permittee shall maintain records of the coal input rate to the coal mill in order to establish compliance with the limit established in Condition D.3.4.
- (b) To document compliance with Condition D.3.6, the Permittee shall maintain records in accordance with (1) through (5) below.
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions.

If the fuel supplier certification is used to demonstrate compliance instead of determining compliance pursuant to 326 IAC 3-7-4, the following, as a minimum, shall be maintained:

- (3) Fuel supplier certifications;
- (4) The name of the fuel supplier; and

- (5) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (c) To document compliance with Condition D.3.12, the Permittee shall maintain records of once per day visible emission notations for baghouses 420L2, 435L, 438L, and 436L or maintain a record of the reason why the visible emission notations were not taken. 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).
- (d) To document compliance with Condition D.3.13, the Permittee shall maintain records of continuous temperature monitoring results for the coal mill exhaust (436L).
- (e) To document compliance with Condition D.3.14, the Permittee shall maintain once per day records of the pressure drop for baghouses 420L2, 435L, 438L, and 436L. 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).
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.17 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.3.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) A quarterly summary of the information to document compliance with the SO₂ limit specified in Condition D.3.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. This report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).

SECTION D.4 FACILITY OPERATION CONDITIONS - ALTERNATE RAW MATERIAL FEED SYSTEM, KILN OPERATION

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

- (g) One (1) alternate raw material feed system, approved for construction in 2007, operating at a maximum capacity of 20 tons per hour each, and consisting of the following pieces of equipment:
- (1) Slag pile, identified as one of the materials identified in Point 1-13, controlled with water mist spray as needed.
 - (2) One (1) slag hopper, identified as 289F, with emissions uncontrolled.
 - (3) One (1) weight feeder, identified as 289V, with emissions uncontrolled.
 - (4) Three (3) covered belt conveyors, identified as 290V, 291V, and 294V, and exhausting to kiln stack 3-1. The exhaust from Stack 3-1 is controlled by electrostatic precipitator 402L.
 - (5) One (1) bucket elevator, identified as 292V, and exhausting to kiln stack 3-1. The exhaust from Stack 3-1 is controlled by electrostatic precipitator 402L.
 - (6) Paved delivery roads with particulate emissions controlled by vacuum sweeping.
- (h) Kiln Operation, with a nominal capacity of 360 tons of dry raw feed per hour and 208 tons clinker per hour:
- (1) One (1) hammermill dryer, identified as Point 3-1C (440G), constructed May 1, 2000, with a nominal capacity of 258 tons per hour, equipped with one (1) electrostatic precipitator (402L) with a 2000 HP motor to control particulate emissions, exhausting to stack 3-1;
 - (2) One (1) pre-heater, pre-calciner Portland cement kiln, originally constructed in 1966 and modified to the semi-dry system in 2000. The semi-dry kiln system includes one (1) coal-fired calciner tower with staged combustion, identified as Point 3-1B (440PH), and one (1) rotary kiln, identified as Point 3-1A (401B), with a combined nominal rated capacity of 827 million British thermal units per hour. An oxygen enrichment system, constructed in 2006, introduces oxygen into the first stage pre-calciner and the front end of the rotary kiln. The semi-dry kiln system has a nominal rated clinker capacity of 208 tons per hour, using coal and the following supplemental fuel:
 - (A) Hazardous waste fuel at a maximum rate allowed by the approved Boiler and Industrial Furnace Permit required by 40 CFR 270;
 - (B) plastic chips, carpet fibers, wood chips, chipped tires, toner, oil filter fluff, cosmetics, and seed corn;
 - (C) petroleum coke; and
 - (D) distillate fuel for burner startup activities.

The particulate emissions from the calciner and kiln are controlled by one (1) electrostatic precipitator (402L) with a 2000 HP motor, exhausting to stack 3-1;

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

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

- (3) Nine (9) screw conveyors, identified as Point 3-1D (403V-410V, 404FV), constructed in 1968 and modified in 1999; and one (1) kiln dust chamber, identified as Point 3-1F (401BF1), constructed in 1969; each with a nominal capacity of 10 tons per hour; with particulate emissions controlled by one (1) electrostatic precipitator (402L) with a 2000 HP motor, exhausting to stack 3-1;
- (4) One (1) return dust bin, identified as Point 3-3A (405F), constructed before 1971 and modified in 1999, with a nominal capacity of 100 tons; one (1) waste dust bin, identified as Point 3-3F (404F), constructed before 1971 and modified in 1999, with a nominal capacity of 75 tons; one (1) hopper, identified as Point 3-3C (445F), constructed May 1, 2000, with a nominal capacity of 60 tons per hour; two (2) bucket elevators, identified as Point 3-3G (411V, 413V), constructed before August 17, 1971, with a nominal capacity of 60 tons per hour; and one (1) rotary feeder, identified as Point 3-3H (405FVV) and one (1) screw conveyor, identified as Point 3-3I (405FVV1), both constructed in 2003, each with a nominal capacity of 60 tons per hour; all equipped with one fabric filter system (FF 3-3, baghouse 403L) to control particulate emissions;
- (5) One (1) non-routine raw material dust truck loading station, constructed before 1971 and modified in 1999, covered by a building enclosure (BE 3-25) to control particulate emissions;
- (6) One (1) conditioning tower, identified as Point 3-5A (480F), with a nominal capacity of 40 tons per hour, using lime injection to control sulfur dioxide emissions; and one (1) alkali bypass system, identified as Point 3-5B, one (1) hopper, identified as Point 3-5C (484F), with a nominal capacity of 10 tons per hour; one (1) dedust cyclone, identified as Point 3-5D (480FL), with a nominal capacity of 31 tons per hour; four (4) screw conveyors, identified as Point 3-5E (480LV1-LV3, 480V), each with a nominal capacity of 10 tons per hour; one (1) weigh hopper, identified as Point 3-5I (481FF); and one (1) pug mill, identified as Point 3-5J (484L); all constructed May 1, 2000; and one (1) CKD loadout spout, identified as 481L, constructed in 2002; all equipped with one (1) fabric filter system (FF 3-5, baghouse 480L), which exhausts to stack 3-1, to control particulate emissions;
- (7) One (1) reject dust bin for cement kiln dust, identified as Point 3-7A (481F), with a nominal capacity of 15 tons, constructed May 1, 2000, equipped with one (1) fabric filter system (FF 3-7, baghouse 483L) to control particulate emissions;
- (8) One (1) alkali bypass system cement kiln dust truck loading station, identified as Point 3-8, constructed in 2000, utilizing mist suppression or equivalent dust suppression to control particulate emissions; and
- (9) One (1) non-routine CKD loadout station, including one (1) screw conveyor, identified as Point 3-4B (412V), constructed in 2001, with a nominal capacity of 10 tons per hour, utilizing water mist suppression to control particulate emissions.

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

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

D.4.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to all the units listed under Condition D.4.2, except when otherwise specified in 40 CFR 63, Subpart LLL.

D.4.2 Particulate Matter Emission Limitation [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63, Subpart LLL (NESHAP for the Portland Cement Manufacturing Industry), the visible emissions from the following emission units shall be less than 10 percent opacity:

Operations	Units	Operations
Alternate Raw Material Feed System	one (1) slag hopper (289F) one (1) weight feeder (289V) three (3) belt conveyors (290V, 291V, 294V) one (1) bucket elevator (292V)	Alternate Raw Material Feed System

D.4.3 Particulate Matter Emission Limitation [326 IAC 2-2]

(a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Point	Filterable PM limits	Filterable PM10 Limits
one (1) hammermill dryer (440G) one (1) calciner tower (440PH) one (1) rotary kiln (401B) one (1) alkali bypass system (3-5B)	Stack 3-1	0.016 gr/dscf 91.3 lbs/hr	0.014 gr/dscf 88.7 lbs/hr
one (1) return dust bin (405F) one (1) waste dust bin (404F)	FF 3-3 (403L)	0.020 gr/dscf 1.40 lbs/hr	0.020 gr/dscf 1.40 lbs/hr
one (1) reject dust bin for cement kiln dust (481F)	FF 3-7 (483L)	0.010 gr/dscf 0.64 lbs/hr	0.010 gr/dscf 0.64 lbs/hr

(b) Pursuant to 326 IAC 2-2 (PSD BACT), the following emission units shall use the control methods listed in the table below:

Units	Control Method
one (1) non-routine raw material dust truck loading station	building enclosure (BE 3-25)
one (1) alkali bypass system cement kiln dust truck loading station (3-8)	water mist suppression or equivalent

(c) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the following emission units shall use water mist suppression, as needed, to control the particulate emissions:

one (1) non-routine CKD loadout station, including one (1) screw conveyor (412V).

D.4.4 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, and listed in Table 1 of 40 CFR 63, Subpart EEE, apply to the units listed in Condition D.4.5 except when otherwise specified in 40 CFR Part 63, Subpart EEE.

D.4.5 NESHAP Emissions Limitation [326 IAC 2-4.1] [326 IAC 20-1][40 CFR Part 63, Subpart EEE]

Pursuant to 326 IAC 2-4.1 (Hazardous Air Pollutants) and 40 CFR 63.1204 (NESHAP for Hazardous Waste Combustors), the emissions from the following units:

Operations	Units	Emission Point
Kiln Operations	*one (1) hammermill dryer (440G)	Stack 3-1
	one (1) calciner tower (440PH) one (1) rotary kiln (401B)	Stack 3-1
	*nine (9) screw conveyors (403V-410V, 404FV)	Stack 3-1
	*one (1) conditioning tower (480F) *one (1) alkali bypass system (3-5B) *one (1) hopper, identified as (484F) *four (4) screw conveyors (480LV1-LV3, 480V) one (1) weight hopper (481FF) one (1) pug mill (484L) one (1) CKD loadout spout (481L)	Stack 3-1

*Note: When these units are not venting through kiln stack (3-1), the emissions from these units shall comply with the requirements in 40 CFR 63, Subpart LLL.

shall be limited as follows:

- (a) Dioxin/Furan emissions shall be limited to 0.20 ng TEQ/dscm corrected to seven percent oxygen; or 0.40 ng TEQ/dscm corrected to seven percent oxygen, when the average of the performance test run average combustion gas temperatures at the inlet to the particulate matter control device is 400 degrees Fahrenheit or less.
- (b) Mercury emissions shall be limited to 120 micrograms/dscm corrected to seven percent oxygen.
- (c) Lead and cadmium combined emissions shall be limited to 330 micrograms/dscm corrected to seven percent oxygen.
- (d) Arsenic, beryllium, and chromium combined emissions shall be limited to 56 micrograms/dscm corrected to seven percent oxygen.
- (e) Carbon monoxide and hydrocarbon emissions shall comply with the following:
 Carbon monoxide in the bypass duct shall not exceed 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to seven percent oxygen; and in addition, during the destruction and removal efficiency (DRE) test runs or their equivalent as provided by 40 CFR 63.1206(b)(7), hydrocarbons in the bypass duct shall not exceed 10 parts per million by volume over an hourly rolling average (monitoring continuously with a continuous emissions monitoring system), dry basis, corrected to seven percent oxygen, and reported as propane.
- (f) Hydrochloric acid and chlorine gas combined emissions shall not exceed 130 parts per million by volume, expressed as hydrochloric acid equivalents, dry basis, corrected to seven percent oxygen.
- (g) Particulate matter (PM) emissions shall be limited to 0.30 pound per ton of feed (dry basis) to the kiln.
- (h) Visible emissions shall be limited to twenty percent (20%) opacity.

D.4.6 Alternate Emission Limitations [40 CFR 63.1206, Subpart EEE]

Pursuant to 40 CFR 63, Subpart EEE, the emission standards and operating requirements of 40 CFR 63, Subpart EEE, shall not apply during those periods of operation when hazardous waste is not in the combustion chamber and the Permittee has:

- (a) Submitted a one-time written notice to the Administrator documenting compliance with all applicable requirements and standards promulgated under authority of the Clean Air Act, including Sections 112 and 129; and

- (b) Documented in the operating record that the source is complying with such applicable requirements in lieu of the emission standards and operating requirements of this subpart.

During those periods of operation when hazardous waste is not in the combustion chamber and the Permittee has complied with (a) and (b) above, the following conditions shall apply instead of the limits listed in Condition D.4.5.

- (a) Particulate matter (PM) emissions shall be limited to 0.30 pound per ton of feed (dry basis) to the kiln.
- (b) Visible emissions shall be limited to twenty percent (20%) opacity.
- (c) Dioxin/Furan emissions shall be limited to 8.7×10^{-11} grains per dry standard cubic foot (TEQ) corrected to seven percent oxygen; or 1.7×10^{-10} grains per dry standard cubic foot (TEQ) corrected to seven percent oxygen, when the average of the performance test run average temperatures at the inlet to the particulate matter control device is 400 degrees Fahrenheit or less.
- (d) The kiln shall be operated such that the temperature of the gas at the inlet to the kiln's particulate matter control device does not exceed the average of the run average temperatures determined during the performance tests required in Condition D.4.24, based upon a 3-hour rolling average.

D.4.7 General Provisions Relating to NESHAP [326 IAC 14-1] [40 CFR Part 61, Subpart A]

The provisions of 40 CFR Part 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-1, apply to the facilities described in Condition D.4.8 except when otherwise specified in 40 CFR Part 61, Subpart FF.

D.4.8 National Emission Standard for Benzene Waste Operations [326 IAC 14] [40 CFR Part 61, Subpart FF]

Pursuant to 40 CFR 61, Subpart FF - National Emissions Standard for Benzene Waste Operations, the Permittee shall design, install, operate and maintain the kiln (3-1A, 401B) to destroy the benzene contained in waste streams meeting the criteria specified in 40 CFR 61.340(b).

- (a) Pursuant to 40 CFR 61.348(a)(1)(iii), the Permittee shall destroy the benzene in the waste stream by incinerating the waste in a cement kiln that achieves a destruction efficiency of ninety-nine percent (99%) or greater for benzene.
- (b) As provided in 40 CFR 61.348(a)(4), the Permittee may aggregate or mix together individual waste streams to create a combined waste stream for the purpose of facilitating treatment of waste to comply with part (a) of this condition.
- (c) Pursuant to 40 CFR 61.348(c), the Permittee shall demonstrate that the cement kiln achieves ninety-nine percent (99%) destruction efficiency by conducting performance tests using test methods and procedures specified in 40 CFR 61.355(f) and Condition D.4.24.
- (d) Pursuant to 40 CFR 61.348(e)(3), the Permittee may operate the cement kiln with an opening that is not sealed and kept closed at all times if the cover and closed-vent system operate such that the cement kiln is maintained at a pressure less than atmospheric pressure and the following conditions are met:
 - (1) The purpose of the opening is to provide dilution air to reduce the explosion hazard;
 - (2) The opening is designed to operate with no detectable emissions as indicated by a instrument reading of less than 500 ppmv above background, as determined at

least once per year by the methods specified in 40 CFR 60.355(h) and Condition D.4.24; and

- (3) The pressure is monitored continuously to ensure that the pressure in the treatment process unit remains below atmospheric pressure.
- (e) Pursuant to 40 CFR 61.348(g), the Permittee shall monitor the cement kiln in accordance with the applicable requirements in 40 CFR 61.354(a)(2) and the following:
 - (1) The Permittee shall install, calibrate, operate, and maintain according to manufacturer's specifications equipment to continuously monitor and record a process parameter (or parameters) that indicates proper system operation.
 - (2) The Permittee shall inspect at least once each operating day the data recorded by the equipment to ensure that the kiln is operating properly.

D.4.9 Sulfur Dioxide Emission Limitations [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, the SO₂ emissions from Stack 3-1 of the semi-dry process kiln and calciner tower shall not exceed 4.13 pounds of SO₂ per ton of clinker produced and 1.01 lbs/MMBtu. Combined with the clinker production limit of 1,606,000 tons/yr, this is equivalent to 3,317 tons/yr of SO₂ emissions. This limit ensures that the increase in SO₂ emissions from the 1999 modification does not exceed 40 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.4.10 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations), the SO₂ emissions from the kiln operation shall comply with the following:

- (a) Less than 6.0 pounds per MMBtu heat input, when combusting coal or coal blend.
- (b) Less than 0.5 pounds per MMBtu heat input, when combusting fuel oil.

Compliance shall be demonstrated on a calendar month average.

D.4.11 Nitrogen Oxide Emission Limitations [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, the NO_x emissions from Stack 3-1 of the semi-dry process kiln shall be controlled by the low-NO_x calciner and good combustion practices and shall not exceed 5.47 pounds per ton of clinker produced. Combined with the clinker production limit of 1,606,000 tons/yr, this is equivalent to 4,428 tons/yr of NO_x emissions. This limit ensures that the increase in NO_x emissions from the 1999 modification does not exceed 40 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.4.12 Nitrogen Oxide Emissions [326 IAC 10-3]

The preheater, precalciner cement kiln (3-1A, 401B) is subject to 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Categories) because it has a process rate greater than twenty-two (22) tons per hour. Pursuant to this rule, the following requirements apply:

- (a) Pursuant to 326 IAC 10-3-3(a)(3), the Permittee shall use semi-dry precalciner kiln processing and the NO_x emissions from the cement kiln shall not exceed 5.10 pounds per ton of clinker produced during the ozone control period, which is defined as May 31 to September 30 for the year of 2004 and during the period from May 1 to September 30 for every year after.
- (b) Pursuant to 326 IAC 10-3-4, beginning May 31, 2004 and each ozone control period thereafter, the NO_x emissions during the ozone control period of each year shall be monitored using a NO_x CEMS in accordance with 40 CFR 60, Subpart A and 40 CFR 60, Appendix B. The Permittee shall also comply with the quality assurance procedures specified in 40 CFR 60, Appendix F and 326 IAC 3, as applicable.

D.4.13 Carbon Monoxide Emission Limitations [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, the CO emissions from Stack 3-1 of the semi-dry process kiln shall be controlled by good combustion practices and shall not exceed 3.65 pounds per ton of clinker produced. Combined with the clinker production limit of 1,606,000 tons/yr, this limitation is equivalent to 2,930 tons/yr of CO emissions. This limit ensures that the increase in CO emissions from the 1999 modification does not exceed 100 tons/yr. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.4.14 Lead Emissions [326 IAC 2-2]

The emissions of lead from the kiln shall be less than 0.00106 pounds per ton of clinker produced. This is equivalent to lead emission of less than 0.85 tons per year. This limit ensures that the lead emission increase from the 1999 modification is below the PSD significant threshold of 0.6 tons/yr. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

D.4.15 Beryllium Emissions [326 IAC 2-2]

The emissions of beryllium from the kiln shall be less than 7.8×10^{-7} pounds per ton of clinker produced. This is equivalent to beryllium emission of less than 0.00063 tons per year. This limit ensures that the beryllium emission increase from the 1999 modification is below the PSD significant threshold of 0.0004 tons/yr. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

D.4.16 Mercury Emissions [326 IAC 2-2]

The emissions of mercury from the kiln shall be less than 0.000224 pounds per ton of clinker produced. This is equivalent to mercury emissions of less than 0.18 tons per year. This limit ensures that the mercury emission increase from the 1999 modification is below the PSD significant threshold of 0.1 tons/yr. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

D.4.17 Operation Standards [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the Permittee shall comply with the following throughput limitations:

- (a) the raw material feed input rate to the kiln system shall not exceed 3,149,427 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (b) the total coal input rate to the kiln and calciner burner systems shall not exceed 313,552 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (c) the clinker production rate shall not exceed 1,606,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.4.18 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Processes	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Alternate Raw Material Feed System	20	30.5
Kiln Operations, excluding the units venting through stack 3-1, baghouses 403L and 483L	208	58.9

NOTE: Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed that shown in this table, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

The limitations for these facilities were calculated using one of the following equations:

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.4.19 Operating Parameter Limits [40 CFR 63.1206] [40 CFR 63.1209]

Pursuant to 40 CFR 63.1206 and 40 CFR 63.1209, the Permittee shall comply with the following operating limits for the kiln system:

- (a) When hazardous waste is combusted in both the calciner (440PH) and the rotary kiln (401B), the Permittee shall comply with the operating parameters listed in the table below for the kiln system:

Operating Parameter	Limits
Min. Combustion Chamber Exit Temperature	1,599EF
Max. Flue Gas Flow Rate	392,500 scfm
Max. Pumpable HWDF Feed Rate - Kiln	10.44 tons/hr
Max. Pumpable HWDF Feed Rate - Calciner	15.54 tons/hr
Max. Total HWDF Feed rate	25.99 tons/hr
Max. Inlet Temperature to ESP	427EF
Max. Inlet Temperature to Bypass Baghouse	424EF
Max. Opacity Monitored	20%
Max. Calciner THC	10 ppm
Max. Bypass CO	100 ppm
Max. Kiln Differential Pressure	< 0.0 inch of water
Max. Tower Differential Pressure	< 0.0 inch of water
Max. Total Hg Feed Rate	120 Φg/dscm
Max. Total SVM Feed Rate	2,761 lbs/hr
Max. Total LVM Feed Rate	556 lbs/hr
Max. Pumpable LVM Feed Rate	556 lbs/hr
Max. Total Chlorine/Chloride Feed Rate	1,063 lbs/hr

- (b) When hazardous waste is combusted in the rotary kiln (401B) only, the Permittee shall comply with the operating parameters listed in the table below for the kiln system:

Operating Parameter	Limits
Min. Combustion Chamber Exit Temperature	1,561EF
Max. Flue Gas Flow Rate	370,799 scfm
Max. Pumpable HWDF Feed Rate - Kiln	13.6 tons/hr
Max. Inlet Temperature to ESP	426EF
Max. Inlet Temperature to Bypass Baghouse	432EF
Max. Opacity Monitored	20%
Max. Calciner THC	10 ppm
Max. Bypass CO	100 ppm
Max. Kiln Differential Pressure	< 0.0 inch of water
Max. Tower Differential Pressure	< 0.0 inch of water
Max. Total Hg Feed Rate	120 Φ g/dscm
Max. Total SVM Feed Rate	133 lbs/hr
Max. Total LVM Feed Rate	233 lbs/hr
Max. Pumpable LVM Feed Rate	233 lbs/hr
Max. Total Chlorine/Chloride Feed Rate	1,239 lbs/hr

D.4.20 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices. If the Operations and Maintenance Plan required by Condition D.4.25 is developed in accordance with Section B - Preventive Maintenance Plan, then once it has been developed, the Operations and Maintenance Plan shall satisfy this condition.

Compliance Determination Requirements

D.4.21 Particulate and Nitrogen Oxide (NOx)

- (a) In order to comply with Conditions D.4.2, D.4.3(a), and D.4.5, the electrostatic precipitator for particulate control shall be in operation and control emissions from all the emission units which vent through kiln stack (Stack 3-1) at all times that these facilities are in operation.
- (b) In order to comply with Conditions D.4.2, D.4.3 (a), and D.4.5, the baghouses for particulate control shall be in operation and control emissions from the units associated with baghouses 403L and 483L all times that these facilities are in operation.
- (c) In order to comply with Conditions D.4.11 and D.4.12, the low-NOx calciner shall be in operation and control emissions from the kiln (3-1A, 401B) at all times that the kiln (3-1A, 401B) is in operation.

D.4.22 Water Spray Operating Condition

Pursuant to CP133-10159-00002, issued April 16, 1999, and in order to demonstrate compliance with Conditions D.4.2, D.4.3(b), and D.4.5, the water mist spray systems associated with the kiln operation shall be operated on an as needed basis while its associated equipment is in operation and the temperature is above 35 degrees Fahrenheit.

D.4.23 Lime Injection Operation

Pursuant to CP-133-10159-00002, issued April 16, 1999, the lime injection system associated with the conditioning tower (3-5A) shall be operated as necessary to demonstrate compliance with the sulfur dioxide limit in Conditions D.4.9 and D.4.10.

D.4.24 Gas Suspension Absorber

Pursuant to CP-133-10159-00002, issued April 16, 1999, the gas suspension absorber system associated with the alkali bypass system (3-5B-F) shall be operated at all times when the kiln gases are exhausting through the bypass system.

D.4.25 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

- (a) In order to demonstrate compliance with Conditions D.4.5 and D.4.8, the Permittee shall demonstrate compliance by commencing performance test for the kiln (stack 3-1), in accordance with 40 CFR 63.1207, 40 CFR 63.1349, and Section C - Performance Testing. These tests shall also establish limits for the operating parameters provided by 40 CFR 63.1209, and demonstrate compliance with the performance specifications for continuous monitoring systems. A comprehensive test shall be repeated once every five (5) years and dioxin/furan, PM, PM10, and opacity tests shall be repeated once every two and one half (2 ½) years from the date of the last valid compliance demonstration.

During each stack test required above, the following items shall be performed:

- (1) Certified continuous opacity monitoring (COM) data shall be observed and recorded or EPA Method 9 opacity tests shall be performed.
 - (2) The kiln temperature shall be measured and recorded at the first stage outlet. The oxygen concentration shall be measured and recorded at the bypass duct.
 - (3) The kiln feed rate shall be measured and recorded.
 - (4) Pursuant to 326 IAC 3-6-3(b)(2), 40 CFR 63.7(e) and 40 CFR 63.1207(g), the tests shall be conducted under conditions representative of the extreme range of normal operating conditions.
 - (5) Pursuant to 326 IAC 3-6-3(b)(3), during the performance tests, the kiln must be operating at 95 percent of its maximum production capacity or other capacities or conditions specified and approved by IDEM to be considered a valid test.
- (b) Certified continuous opacity monitoring (COM) data shall be performed concurrently with the particulate matter compliance tests for Stack 3-1 of the semi-dry process kiln (3-1A, 401B) unless meteorological conditions require rescheduling the opacity tests to another date.
- (c) In order to demonstrate compliance with Condition D.4.8, the Permittee shall demonstrate that the cement kiln achieves ninety-nine percent (99%) destruction efficiency by conducting performance tests using test methods and procedures specified in 40 CFR 61.355(f).
- (d) Pursuant to 40 CFR 61.348(e)(3), the Permittee must demonstrate no detectable emissions for openings in the cement kiln by performing a test, at least once per year, in accordance with 40 CFR 61.355(h).

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

D.4.26 NESHAP Monitoring Requirements [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall maintain a written operation and maintenance plan for the units listed in Condition D.4.2 by June 14, 2002, which is the compliance date for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry, or within 180 days after startup, whichever is later. The plan shall include the following information:

- (a) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emission limits in Condition D.4.2; and
- (b) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348. Such procedures must include the following provisions:

- (1) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
 - (2) If no visible emissions are observed in six consecutive monthly tests for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (3) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (4) If visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40 CFR 60, Subpart A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.
 - (5) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
 - (6) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the Permittee shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of paragraphs (1) through (4) of this section for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (7) of this section.
 - (7) If visible emissions from a building are monitored, the requirements of paragraphs (1) through (4) of this section apply to the monitoring of the building, and the Permittee shall also test visible emissions from each side, roof and vent of the building for at least 1 minute. The test must be conducted under normal operating conditions.
- (c) Corrective actions to be taken when required by paragraph (b).

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

D.4.27 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 20-1] [40 CFR 63, Subpart EEE] [326 IAC 2-7-6(1),(6)]

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- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions), 326 IAC 2, and 40 CFR 63, Subpart EEE, a continuous monitoring system shall be installed, calibrated, maintained, and operated for measuring the opacity from the kiln, pursuant to 326 IAC 3-5. The continuous monitoring system shall be installed and operational prior to conducting the performance tests required in Condition D.4.24. The continuous monitoring system shall meet the performance specifications of 326 IAC 3-5-2 and 40 CFR 63.8(c). 326 IAC 3-5 is not federally enforceable.

- (b) Pursuant to 40 CFR 63.1209(a)(1)(i), the Permittee shall install, calibrate, maintain, and operate a carbon monoxide continuous emissions monitor to demonstrate continuous compliance with the carbon monoxide limit specified in 40 CFR 63 and Condition D.4.5. An oxygen CEMS shall also be installed, calibrated, maintained, and operated to continuously correct the carbon monoxide level to 7 percent oxygen.

In the event that the carbon monoxide continuous emissions monitor fails, the Permittee shall monitor the oxygen content and temperature once per hour. Pursuant to 40 CFR 63.1209(a)(6)(iii)(B), the Permittee is not subject to the CEMS requirements of 40 CFR 63, Subpart EEE during periods of time that the Permittee meets the requirements of 40 CFR 63.1206(b)(1)(ii). If the oxygen content or temperature is outside the range established in the latest compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

- (c) The Permittee shall comply with all other monitoring requirements pursuant to 40 CFR 63.1209 and monitor the parameters listed in Condition D.4.19 continuously.
- (d) Pursuant to CP133-10159-00002 issued April 16, 1999 and 326 IAC 2-2 (Prevention of Significant Deterioration), and 326 IAC 12, and in order to comply with Conditions D.4.2(b), D.4.5(h), D.4.9, D.4.10, D.4.11, and D.4.12, the Permittee shall continuously monitor and record the following parameters from the semi-dry process kiln:

- (1) Opacity;
- (2) Sulfur dioxide emission rates; and
- (3) Nitrogen oxides.

The continuous monitors shall be operated according to Conditions C.13 and C.14. In the event that the sulfur dioxide continuous emissions monitor fails, the Permittee shall perform fuel sampling and analysis on each new shipment of fuel. If lime injection is used, the lime injection rate shall be monitored once every hour. If the lime injection rate is outside the range established in the latest compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

In the event that the nitrogen oxide continuous emissions monitor fails, the Permittee shall monitor the oxygen content and temperature once per hour. If the oxygen content or temperature is outside the range established in the latest compliance stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

D.4.28 NESHAP Monitoring Requirements [326 IAC 20] [40 CFR 63, Subpart EEE]

Upon issuance of the permit, the Permittee shall perform the following monitoring requirements:

- (a) The Permittee shall maintain a written operations and maintenance plan for the kiln. The plan shall include the following information:

- (1) Procedures for proper operation, inspection, maintenance, and corrective measures for all components of the kiln and associated air pollution control device(s) in order to meet the emissions limits in Conditions D.4.4 and D.4.5; and
- (2) Procedures for operating and maintaining the kilns in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels achieved during the comprehensive performance test.

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

- (b) The Permittee shall perform the monitoring requirements specified in 40 CFR 63.1209.

D.4.29 Visible Emissions Notations

- (a) Once per day visible emission notations of each baghouse stack exhaust associated with the kiln operations, excluding the kiln exhaust stack (3-1), 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 or 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.4.30 ESP Parametric Monitoring

- (a) The Permittee shall monitor and record the total KVA (Kilovolt-Amperes) of the ESP every minute when the kiln is in operation as provided in 326 IAC 1-5-3. When for any one rolling hourly average KVA is below the normal minimum of 153, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. The Compliance Response Plan shall also contain troubleshooting contingency and response steps for when any one (1) minute reading drops five (5) KVA below the predetermined baseline. This parameter can be adjusted to incorporate values determined from a compliant stack test. A KVA reading or a rolling hourly average KVA that is below the above mentioned minimum is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

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

- (b) Pursuant to CP133-10159-00002, issued April 16, 1999, in the event that an ESP failure has been observed:
 - (1) All reasonable measures shall be taken to correct, as expeditiously as practicable, the condition causing the emissions to exceed the allowable limits.

- (2) All possible steps shall be taken to minimize the impact of the excessive emissions on ambient air quality which may include, but not limited to, curtailment of operations and/or shutdown of the facility.

D.4.31 Baghouse Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses (403L and 483L) used in conjunction with the kiln operation at least once per day when the controlled units are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range of 1 and 8 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 or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.4.32 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.33 Record Keeping Requirements

- (a) To document compliance with 40 CFR 63, Subpart EEE, the Permittee shall maintain all records required by 40 CFR 63.1210 and 40 CFR 63.1211, including, but not limited to, the following:
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
 - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
 - (A) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
 - (B) All records of applicability determination, including supporting analyses.
 - (3) The Permittee shall maintain all records of continuous monitoring system data required by 40 CFR 63.10(c).

- (b) Pursuant to 40 CFR 61.356(e)(1), the Permittee shall maintain a statement signed and dated by the Permittee certifying that the treatment unit (cement kiln) is designed to operate at the documented performance level when the waste stream entering the unit is at the highest stream flow rate and benzene content expected to occur. The documentation shall be retained for the life of the cement kiln.
- (c) Pursuant to 40 CFR 61.356(e)(3), the Permittee shall maintain all test information necessary to demonstrate the cement kiln performance as specified in 40 CFR 61.356(e)(3)(i) through (iv).
- (d) Pursuant to 40 CFR 61.356(i), the Permittee shall maintain documentation that includes the following information regarding the cement kiln operation:
 - (1) Dates of startup and shutdown of the units.
 - (2) For a process parameter monitored in accordance with 40 CFR 61.354(a)(2), the Permittee shall maintain records that include a description of the operating parameter (or parameters) to be monitored to ensure that the units will be operated in conformance with the standard in 40 CFR 61.348(c) and the units' design specifications, and an explanation of the criteria used for selection of that parameter (or parameters). This documentation shall be kept for the life of the equipment.
 - (3) Periods when the units are not operated as designed.
- (e) Pursuant to 326 IAC 10-3-5 and to document compliance with Condition D.4.12, beginning May 31, 2004 and each ozone control period thereafter, the Permittee shall maintain records of the following:
 - (1) Emissions, in pounds of NO_x per ton of clinker produced from each affected Portland cement kiln; and
 - (2) Daily clinker production records.
- (f) To document compliance with Condition D.4.17, the Permittee shall maintain records of the raw material feed input to the kiln system, the total coal input rate to the kiln and calciner burner systems, and the clinker production rate in order to establish compliance with the limits established in Condition D.4.17.
- (g) To document compliance with Conditions D.4.25, D.4.27, D.4.29, and D.4.30, the Permittee shall maintain records in accordance with (1) through (8) below. Records shall be complete and sufficient to establish compliance with the limits established in this section.
 - (1) Data and results from the most recent stack test.
 - (2) All continuous emissions monitoring data.
 - (3) Total KVA of ESP on a one (1) hour rolling average.
 - (4) The results of the ESP inspections required under Condition D.4.30(b).
 - (5) Visible emission notations once per day for all baghouses. 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).
 - (6) Method 9 opacity readings for the kiln whenever required by this permit.

- (7) All preventive maintenance measures taken.
- (8) All response steps taken and the outcome for each.
- (h) To document compliance with Condition D.4.31, the Permittee shall maintain once per day records of the pressure drop across the baghouses. 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).
- (i) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
 - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
 - (A) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
 - (B) All records of applicability determination, including supporting analyses.
- (j) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.34 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.4.17 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7 (and 40 CFR 60.63(d) if applicable), from the continuous monitoring system, shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported.
- (c) The Permittee shall submit a continuous monitoring system (CMS) performance report with the excess opacity summaries, in accordance with 40 CFR 63.10(e)(3) and 40 CFR 63, Subpart A. This report shall be submitted when CMS downtime is 5% or greater in accordance with 40 CFR 63.10(e)(3)(viii).
- (d) The Permittee shall submit a semi-annual summary report which contains the information specified in 40 CFR 63.10(e)(3)(vi). If the total continuous monitoring system (CMS) downtime for any CO, hydrocarbon, SO₂, NO_x, CEM, or any CMS for the reporting period is ten percent or greater of the total operating time for the reporting period, the Permittee shall submit an excess emissions and CMS performance report along with the summary report.
- (e) To document compliance with 326 IAC 2-4.1 and 40 CFR 63, Subpart EEE, the Permittee shall report the information required by 40 CFR 63.1211, including, but not limited to the following:
 - (1) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.

- (2) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1207.
- (3) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
- (4) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317) 233-5674 or facsimile (FAX) transmission at (317) 233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (5) Pursuant to 40 CFR 63.1206(c)(3)(vi), the Permittee shall report excessive exceedances.
- (6) Pursuant to 40 CFR 63.1206(c)(4)(iv), the Permittee shall report emergency safety vent openings.
- (f) Pursuant to 40 CFR 61.357(d)(7)(ii) and (v), the Permittee shall submit to the US EPA and IDEM, OAQ a quarterly report containing the following information:
 - (1) Each 3-hour period of operation, during times when waste is being combusted, during which the average value of the monitored parameter is outside the range of acceptable values or during which the cement kiln is not operating as designed
 - (2) Any period, during times when waste is being combusted, in which the pressure in cement kiln is equal to or greater than atmospheric pressure.
- (g) Pursuant to 326 IAC 10-3-5, the Permittee shall submit the following:
 - (1) by May 31, 2004, the Permittee shall submit the following information:
 - (A) The identification number and type of each unit subject to this rule;
 - (B) The name and address of the plant where the unit is located;
 - (C) The name and telephone number of the person responsible for demonstrating compliance with this rule; and
 - (D) Anticipated control measures, if any.
 - (2) A report documenting the total NOx emissions and the average NOx emission rate for the ozone control period of each year by October 31, beginning in 2003 and each year thereafter. For Portland cement kilns complying with 326 IAC 10-3-3(a)(1), estimated emissions and emissions rate shall be determined in

accordance with 326 IAC 10-3-3(d) or from CEMS data and a certification that the low NOx calciner was installed, operated, and maintained according to 326 IAC 10-3 shall be included with this report.

- (h) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
- (1) The plan required by 40 CFR 63.1350 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry, or upon startup, whichever is later.
 - (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
 - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
 - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
 - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317)233-5674 or facsimile (FAX) transmission at (317)233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (i) In addition to being submitted to the address listed in Section C - General Reporting Requirements, all reports submitted pursuant to 40 CFR 60, Subpart A, or 40 CFR 63, Subpart A shall also be submitted to the U.S. EPA at the following address:

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

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

SECTION D.5 FACILITY OPERATION CONDITIONS - CLINKER COOLER OPERATIONS

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

- (i) Clinker Cooler Operations, with a nominal capacity of 208 tons of clinker per hour:
- (1) One (1) clinker cooler, identified as Point 3-9A (401C), constructed before August 17, 1971 and modified in 2000, with a nominal capacity of 208 tons per hour; one (1) clinker breaker, identified as Point 3-9B (401CG), constructed January 1, 1969 and modified in 2000, with a nominal capacity of 208 tons per hour; one (1) dropout chamber, identified as Point 3-9C (401CL), constructed January 1, 1969, with a nominal capacity of 20 tons per hour; two (2) vibrating feeders, identified as Point 3-9F (427V, 428V), constructed before August 17, 1971 and modified in 2000, with a nominal capacity of 208 tons per hour each; and one (1) drag conveyor, identified as Point 3-9G (401CV), and eight (8) screw conveyors (422V, 470CV2, 470CV3, 470CV9, 470CV10, 474V-476V), all constructed before August 17, 1971 and modified in 2001, each with a nominal capacity of 10 tons per hour; all equipped with one (1) fabric filter system (FF 3-9, baghouse 471-CL) to control particulate emissions, exhausting to stack 3-2;
 - (2) Two (2) belt conveyors, identified as Point 3-11A (421V, 509V); and two (2) bucket elevators, identified as Point 3-11B (418V, 419V); all constructed before 1971 and modified in 2000, with a nominal capacity of 208 tons per hour each (note that belt conveyor (421V) is a non-routine belt). Particulate emissions from 421V, 418V, and 419V are controlled by the one (1) fabric filter system (FF 3-9, baghouse 471-CL). Particulate emissions from 509V are controlled by the one (1) fabric filter system (FF 3-11, baghouse 406L). If needed, particulate emissions from 418V can also be controlled by the one (1) fabric filter system (FF 3-11, baghouse 406L);
 - (3) One (1) non-routine outdoor clinker pile, identified as Point 3-13, modified in 1999, utilizing water mist suppression or equivalent dust suppression to control particulate emissions;
 - (4) One (1) belt conveyor (turning tower), identified as Point 3-12 (510V), constructed before 1971 and modified in 2000, with a nominal capacity of 208 tons per hour, equipped with one (1) fabric filter system (FF 3-12, baghouse 506L) to control particulate emissions;
 - (5) One (1) bucket elevator, identified as Point 3-22 (500V), constructed October 1, 1999, with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 3-22, baghouse 500L) to control particulate emissions;
 - (6) Two (2) feeders, identified as Point 3-24A (207F, 208F); and one (1) belt conveyor, identified as Point 3-24B (219V); each constructed before August 17, 1971, with a nominal capacity of 300 tons per hour each, equipped with one (1) fabric filter system (FF 3-24, baghouse 220L) to control particulate emissions;
 - (7) Seven (7) clinker silos, identified as Point 3-14 (501A-507A), constructed before 1971 and modified in 1999, each with a nominal capacity of 5000 tons, equipped with one (1) fabric filter system (FF 3-14, baghouse 503L) to control particulate emissions;

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

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

- (8) One (1) belt conveyor, identified as Point 3-21 (220V), constructed before August 17, 1971, and one (1) belt scale, constructed in 2003, with a nominal capacity of 300 tons per hour, equipped with one (1) fabric filter system (FF 3-21, baghouse 221L) which was installed in 2001 to control particulate emissions;
- (9) One (1) clinker resizing operation, identified as Point 3-24, constructed in 2003, operating parallel to existing clinker feeders and a clinker belt conveyor, comprised of the following activities and facilities:
 - (A) One (1) loader haul operation, identified as Unit #2 (F3-32), with fugitive emissions;
 - (B) One (1) vibrating feeder, identified as Unit #2 (F3-33), with a nominal throughput of two hundred fifty (250) tons per hour of weathered clinker, with emissions uncontrolled;
 - (C) One (1) jaw crusher, identified as Unit #3, with a nominal throughput of two hundred fifty (250) tons per hour of weathered clinker, with emissions controlled by Dust Collector #1, exhausting to stack S3-34; and
 - (D) Two (2) belt conveyors, identified as Unit #4 and Unit #5, operating in series, feeding existing belt 3-21 (220V), each with a nominal throughput of two hundred fifty (250) tons per hour, with emissions controlled by Dust Collector #1, exhausting to stack S3-34.

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

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

D.5.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the clinker cooler operations listed in Condition D.5.2 except when otherwise specified in 40 CFR 63, Subpart LLL.

D.5.2 Particulate Matter Emission Limitation [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63, Subpart LLL (NESHAP for the Portland Cement Manufacturing Industry), the following units shall comply with the following limitations:

Units	Emission Point	PM Limit
one (1) clinker cooler (401C) one (1) clinker breaker (401CG) one (1) dropout chamber (401CL) two (2) vibrating feeders (427V, 428V) one (1) drag conveyor (401CV) eight (8) screw conveyors (422V, 470CV2, 470CV3, 470CV9, 470CV10, 474V-476V) one (1) belt conveyor (421V) two (2) bucket elevators (418V, 419V)*	FF 3-9 (471-CL, Stack 3-2)	0.10 pound per ton of feed (dry basis) to the kiln (filterable); and 10 percent opacity

Units	Emission Point	PM Limit
one (1) belt conveyor (509V) one (1) bucket elevator (418V)*	FF 3-11 (406L)	10 percent opacity
one (1) belt conveyor (510V)	FF 3-12 (506L)	
one (1) bucket elevator (500V)	FF 3-22 (500L)	
two (2) feeders (207F, 208F) one (1) belt conveyor (219V)	FF 3-24 (220L)	
seven (7) clinker silos (501A-507A)	FF 3-14 (503L)	
one (1) belt conveyor (220V) one (1) belt scale	FF 3-21 (221L)	
one (1) vibrating feeder (Unit #2)	F3-33	
one (1) jaw crusher (Unit #3) two (2) belt conveyors (Unit #4 and #5)	Dust Collector #1	

*Particulate emissions from 418V can be controlled by either the FF 3-11 (406L) or FF 3-9 (471-CL)

D.5.3 Particulate Matter Emission Limitation [326 IAC 2-2]

(a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Point	Filterable PM limits	Filterable PM10 Limits
one (1) clinker cooler (401C) one (1) clinker breaker (401CG) one (1) dropout chamber (401CL) two (2) vibrating feeders (427V, 428V) one (1) drag conveyor (401CV) eight (8) screw conveyors (422V, 470CV2, 470CV3, 470CV9, 470CV10, 474V-476V) one (1) belt conveyor (421V) two (2) bucket elevators (418V, 419V)*	FF 3-9 (471-CL, Stack 3-2)	0.015 gr/dscf 7.25 lbs/hr	0.015 gr/dscf 7.25 lbs/hr
one (1) belt conveyor (509V) one (1) bucket elevator (418V)*	FF 3-11 (406L)	0.015 gr/dscf 0.64 lbs/hr	0.015 gr/dscf 0.64 lbs/hr
one (1) belt conveyor (510V)	FF 3-12 (506L)	0.015 gr/dscf 0.48 lbs/hr	0.015 gr/dscf 0.48 lbs/hr
seven (7) clinker silos (501A-507A)	FF 3-14 (503L)	0.015 gr/dscf 0.59 lbs/hr	0.015 gr/dscf 0.59 lbs/hr

*Particulate emissions from 418V can be controlled by either the FF 3-11 (406L) or FF 3-9 (471-CL)

(b) Pursuant to 326 IAC 2-2 (PSD BACT), the following limitations apply to the following units:

Units	Point	PM Limits	PM10 Limits
one (1) bucket elevator (500V)	FF 3-22 (500L)	0.010 gr/dscf 0.28 lbs/hr	0.010 gr/dscf 0.28 lbs/hr

(c) Pursuant to 326 IAC 2-2 (PSD BACT), the following emission unit shall use water mist suppression or equivalent to control particulate emissions:

one (1) non-routine outdoor clinker pile (3-13).

(d) Pursuant to MSM 133-16484-00002, issued March 11, 2003, the clinker resizing operation shall comply with the following:

(1) The throughput to clinker resizing operation shall not exceed 50,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

- (2) The PM/PM10 emissions from Dust Collector #1 shall not exceed 0.01 gr/acfm and 0.30 lbs/hr.

Combined with the PM/PM10 emissions from the belt scale for belt conveyor 220V and fugitive emissions, the emissions from this modification are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

- (e) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the PM/PM10 emissions from baghouse 221L, which is used to control the emissions from belt scale for belt conveyor 220V, shall not exceed 0.26 lbs/hr. This is equivalent to 1.14 tons/yr of PM/PM10 emissions. Combined with the PM/PM10 emissions from the clinker resizing operation, the emissions from the modification permitted in MSM 133-16484-00002, issued March 11, 2003, are limited to less than 15 tons/yr for PM10 and less than 25 tons/yr for PM. Therefore, the requirements of 326 IAC 2-2 (PSD) are not applicable.

D.5.4 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Processes	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Clinker Cooler Operations, excluding the units venting through baghouses 471CL, 406L, 506L, 500L, and 503L	208	58.9

The limitation for these operations was calculated using the following equation:

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and } P = \text{process weight rate in tons per hour}$$

D.5.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices. If the Operations and Maintenance Plan required by Condition D.5.8 is developed in accordance with Section B - Preventive Maintenance Plan, then once it is developed, the Operations and Maintenance Plan shall satisfy this condition.

Compliance Determination Requirements

D.5.6 Particulate Matter (PM) and PM10

- (a) In order to comply with Conditions D.5.2, D.5.3, and D.5.4, the baghouses for PM and PM10 control shall be in operation and control emissions from the clinker cooler operations at all times that 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.

D.5.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart LLL]

- (a) In order to demonstrate compliance with Condition D.5.2 and pursuant to 40 CFR 63.1349, no later than two and one half (2 ½) years from the date of last valid compliance demonstration, the Permittee shall perform compliance testing for the clinker cooler (stack 3-2) utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every two and one half (2 ½) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.
- (b) In order to demonstrate compliance with Conditions D.5.3(b), (d)(2), and (e), no later than 180 days after issuance of this Part 70 Permit, the Permittee shall perform PM and PM10 stack testing for the units listed in Conditions D.5.3(b), (d)(2), and (d), utilizing methods as approved by the Commissioner. PM10 includes filterable PM10 and condensible PM10. Testing shall be conducted in accordance with Section C - Performance Testing.
- (c) A certified continuous opacity monitoring (COM) data shall be performed concurrently with the particulate matter compliance tests for Stack 3-2 of the clinker cooler operation unless meteorological conditions require rescheduling the opacity tests to another date.

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

D.5.8 NESHAP Monitoring Requirements [326 IAC 20] [40 CFR 63, Subpart LLL]

- (a) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall maintain a written operation and maintenance plan for the units listed in Condition D.5.2. The plan shall include the following information:
 - (1) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emissions limit in Condition D.5.2(a); and
 - (2) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348. Such procedures must include the following provisions:
 - (A) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source, except for those sources with continuous opacity monitors, in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
 - (B) If no visible emissions are observed in six consecutive monthly test for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (C) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (D) If visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40

CFR 60, Subpart A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.

- (E) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
- (F) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the Permittee shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of paragraphs (A) through (E) of this section for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (G) of this section.
- (G) If visible emissions from a building are monitored, the requirements of paragraphs (A) through (E) of this section apply to the monitoring of the building, and the Permittee shall also test visible emissions from each side, roof and vent of the building for at least 1 minute. The test must be conducted under normal operating conditions.

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

- (b) The Permittee shall continuously monitor opacity of emissions at the outlet of the PM control device for the clinker cooler (Stack 3-2). The COM shall be installed, maintained, calibrated and operated as required by 40 CFR 63, Subpart A and 326 IAC 3-5.

D.5.9 Visible Emissions Notations

- (a) Visible emission notations of each baghouse associated with the clinker cooler operation stack exhausts (406L, 506L, 500L, 220L, 503L, 221L, and Dust Collector #1), shall be performed once per day 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 or 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.5.10 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the clinker cooler operation at least once per day when those processes are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range listed below:

Baghouse	Pressure Drop (inches of water)
406L, 506L, 500L, 220L, 503L, 221L, Dust Collector #1	1-8

or a range established during the latest stack test, the Permittee shall take reasonable response - steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.5.11 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 2-7-5(3)] [326 IAC 2-7-19]

D.5.12 Record Keeping Requirements

- (a) To document compliance with Condition D.5.3(d)(1), the Permittee shall maintain records of the throughput to the clinker resizing operation.
- (b) To document compliance with Conditions D.5.7, D.5.8(b), and D.5.9, the Permittee shall maintain records in accordance with (1) through (6) below. Records shall be complete and sufficient to establish compliance with the limits established in this section.
 - (1) Data and results from the most recent stack test.
 - (2) All continuous opacity monitoring data.
 - (3) Visible emission notations once per day for baghouses 406L, 506L, 500L, 220L, 503L, 221L, and Dust Collector #1. 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).
 - (4) Method 9 opacity readings for the clinker cooler whenever required by this permit.
 - (5) All preventive maintenance measures taken.
 - (6) All response steps taken and the outcome for each.
- (c) To document compliance with Condition D.5.10, the Permittee shall maintain once per day records of the pressure drop. 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).

- (d) To document compliance with the NESHAP, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 60.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
 - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
 - (A) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
 - (B) All records of applicability determination, including supporting analyses.
 - (3) The Permittee shall maintain all records of continuous monitoring system data required by 40 CFR 63.10(c).
- (e) Pursuant to 326 IAC 3-5-6, on and after the certification of the continuous opacity monitor, the Permittee shall maintain records, including raw data, of all monitoring data and supporting information for a minimum of five (5) years from the date of any of the following:
- (1) A monitoring sample.
 - (2) A measurement.
 - (3) A test.
 - (4) A certification.
 - (5) A report.
- The records shall include the following:
- (1) A documentation relating to design, installation, and testing of elements of the monitoring system and documentation relating to required corrective action or compliance plan activities.
 - (2) All maintenance logs, calibration checks, and other required quality assurance activities.
 - (3) All records of corrective and preventive action.
 - (4) A log of plant operations, including dates of facility downtime, time of commencement and completion of each downtime, and the reason for each downtime.
- (f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.13 Reporting Requirements

- (a) A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7 (and 40 CFR 60.63(d) if applicable), from the continuous monitoring system shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, within thirty (30) days after the end of the quarter being reported. If applicable, the excess

opacity summary shall also be submitted in accordance with 40 CFR 60.7(c), 40 CFR 60.63(d) and 40 CFR 63.1354(8).

- (b) A quarterly summary of the information to document compliance with Condition D.5.3(d)(1) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (c) To document compliance with the NESHAP 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
- (1) The plan required by 40 CFR 63.1350 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry.
 - (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
 - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
 - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
 - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAQ Compliance Section at (317) 233-5674 or facsimile (FAX) transmission at (317) 233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
 - (6) Beginning June 14, 2002, the Permittee shall submit a continuous monitoring system (CMS) performance report with the excess opacity summaries, in accordance with 40 CFR 63.1354(8) and 40 CFR 63, Subpart A.
 - (7) Beginning June 14, 2002, the Permittee shall submit a semi-annual summary report which contains the information specified in 40 CFR 63.10(e)(3)(vi), as well as all failures to comply with any provision of the operation and maintenance plan developed in accordance with 40 CFR 63.1350(a). If the total continuous monitoring system (CMS) downtime for any CEM or any CMS for the reporting period is ten percent or greater of the total operating time for the reporting period,

the Permittee shall submit an excess emissions and CMS performance report along with the summary report.

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

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

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

SECTION D.6 FACILITY OPERATION CONDITIONS - FINISH MILL OPERATIONS, CEMENT STORAGE, LOADING, AND PACKAGING ACTIVITIES, BLEND FACILITY, AND PACKHOUSE OPERATIONS

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

(j) Finish Mill Operations:

- (1) Four (4) vibrating feeders, identified as Point 3-15 (504V-507V), constructed before 1971 and modified in 1999, with a nominal capacity of 250 tons per hour each, equipped with one (1) fabric filter system (FF 3-15, baghouse 505L) to control particulate emissions;
- (2) Four (4) vibrating feeders, identified as Point 3-17A (501V-503V, 508V); and one (1) belt conveyor, identified as Point 3-17B (221V); all constructed before 1971 and modified in 1999, with a nominal capacity of 250 tons per hour each, equipped with one (1) fabric filter system (FF 3-17, baghouse 504L) to control particulate emissions;
- (3) Two (2) belt conveyors, identified as Point 3-20B (514V, 511V), constructed before August 17, 1971; one (1) bucket elevator, identified as Point 3-20A (513V), constructed June 1, 2000; and one (1) belt conveyor, identified as 511V2, constructed in 2003; each with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 3-20, baghouse 513L) to control particulate emissions;
- (4) One (1) belt conveyor, identified as Point 4-13A (515V), constructed in 1969 and modified in 2000, with a nominal capacity of 250 tons per hour; and four one (4) (1) silos, identified as Point 4-13B (650A-653A), (652), constructed January 1, 1969, with a nominal capacity of 2,440, 2,315, 2,260, and 200 tons respectively, equipped with one (1) fabric filter system (FF 4-13, baghouse 515L) to control particulate emissions. The three (3) silos, 650A, 651A, and 653A, with a nominal capacity of 2,440, 2,315, and 200 tons, respectively, constructed in 1969, and controlled by baghouses 760L, 761L, and 762L (constructed in 2006), respectfully to control particulate emissions;
- (5) One (1) belt conveyor, identified as Point 4-14 (516V), constructed January 1, 1969, with a nominal capacity of 250 tons per hour, equipped with one (1) fabric filter system (FF 4-14, baghouse 516L) to control particulate emissions;
- (6) No. 1 Finish Mill, modified in 1993, with a nominal capacity of 70 tons of clinker per hour:
 - (A) Two (2) belt conveyors, identified as Point 4-1A (639V, 640V), constructed in 1971 and modified in 1999, with a nominal capacity of 250 tons per hour each; one (1) clinker bin, identified as Point 4-1B (601F), constructed before 1971 and modified in 1999, with a nominal capacity of 260 tons; one (1) gypsum bin, identified as Point 4-1C (603F), constructed before 1971 and modified in 1999, with a nominal capacity of 240 tons per hour; one (1) spill screw, identified as Point 4-1D (646V), constructed in 2002, with a nominal capacity of 5 tons per hour; and one (1) belt conveyor, identified as 614V, modified in 2003, with a maximum capacity of 250 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-1, baghouse 617L) to control particulate emissions;
 - (B) One (1) No. 1 finish mill, identified as Point 4-2A (603G), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; one (1) elevator, identified as Point 4-2B (626V), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; and one (1) spill screw, identified as Point 4-2D (642V), constructed in 1969 and modified in 1999, with a nominal capacity of 5 tons per hour; all equipped with one (1) fabric filter system (FF 4-2, baghouse 613L) to control particulate emissions;

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

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

- (C) One (1) air separator, identified as Point 4-3A (605G), constructed in 1994 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) tailing screw, identified as Point 4-3D (613V), constructed in 1969 and modified in 1999, with a nominal capacity of 200 tons per hour; two (2) cement coolers, identified as Point 4-3E (603C, 604C), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour each; one (1) F.K. pump hopper, identified as Point 4-3G (611F), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; one (1) mill feed belt, identified as Point 4-3H (641V), constructed in 1974, with a nominal capacity of 70 tons of clinker per hour; and one (1) clinker F.O.W. belt, identified as Point 4-3I (601V), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons per hour; equipped with one (1) fabric filter system (FF 4-3, baghouse 606L) to control particulate emissions;
- (D) One (1) fringe bin, for off specification cement and cement kiln dust identified as Point 4-16A (604F), constructed before August 17, 1971, with a nominal capacity of 66 tons; and two (2) screw feeders, identified as Point 4-16B (611V, 604F1V), constructed January 1, 1969, with a nominal capacity of 20 tons per hour each; equipped with one (1) fabric filter system (FF 4-16, baghouse 605L) to control particulate emissions; and
- (E) One (1) weigh belt, identified as Point 4-15A (605V), and one (1) belt conveyor, identified as Point 4-15B (616V), constructed before 1974, covered by a building enclosure to control particulate matter;
- (7) No. 2 Finish Mill, with a nominal capacity of 70 tons of clinker per hour:
 - (A) Two (2) conveyor belts, identified as Point 4-4A (639V, 640V), constructed in 1969 and modified in 1999, with a nominal capacity of 250 tons per hour; one (1) clinker bin, identified as Point 4-4B (602F), constructed before 1971 and modified in 1999, with a nominal capacity of 260 tons; one (1) gypsum bin, identified as Point 4-4C (603F), constructed before 1971 and modified in 1999, with a nominal capacity of 240 tons; one (1) clinker F.O.W. belt, identified as Point 4-4D, (602V), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons per hour; and one (1) feed belt, identified as Point 4-4E (644V), constructed in 1975 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-4, 636L) to control particulate emissions;
 - (B) One (1) No. 2 finish mill, identified as Point 4-5A (602G), constructed before 1971 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; and one (1) spill screw, identified as Point 4-5B (645V), constructed in 1969 and modified in 1999, with a nominal capacity of 5 tons per hour; all equipped with one (1) fabric filter system (FF 4-5, baghouse 603L) to control particulate emissions; and

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

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

- (C) One (1) air separator, identified as Point 4-6A (604G), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) elevator, identified as Point 4-6B (621V), constructed before 1971 and modified in 1999, with a nominal capacity of 200 tons per hour; one (1) tailing screw, identified as Point 4-6D (612V), constructed in 1969 and modified in 1999, with a nominal capacity of 200 tons per hour; two (2) cement coolers, identified as Point 4-6E (601C, 602C), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour each; one (1) F.K. pump hopper, identified as Point 4-6F (610F), constructed in 1969 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; and one (1) mill feed belt, identified as Point 4-6G (644V), constructed in 1975 and modified in 1999, with a nominal capacity of 70 tons of clinker per hour; all equipped with one (1) fabric filter system (FF 4-6, baghouse 602L) to control particulate emissions;
- (8) No. 3 Finish Mill, with a nominal capacity of 95 tons of clinker per hour:
 - (A) One (1) No. 3 finish mill, identified as Point 4-9 (660G), constructed June 1, 2000, with a nominal capacity of 95 tons of clinker per hour, equipped with one (1) fabric filter system (FF 4-9, baghouse 660L) to control particulate emissions;
 - (B) One (1) hopper, identified as Point 4-10C (667F), with a nominal capacity of 95 tons of clinker per hour; one (1) cooler, identified as Point 4-10D (664C), with a nominal capacity of 95 tons of clinker per hour; and one (1) feed belt, identified as Point 4-10E (654V), with a nominal capacity of 95 tons of clinker per hour; all constructed June 1, 2000, equipped with one (1) fabric filter system (FF 4-10, baghouse 661L) to control particulate emissions;
 - (C) One (1) fringe bin for off specification cement and cement kiln dust, identified as Point 4-11B (665F), with a nominal capacity of 80 tons; one (1) elevator, identified as Point 4-11C (661V), with a nominal capacity of 230 tons per hour; and one (1) rotary feeder, identified as Point 4-11D (665FV), with a nominal capacity of 50 tons per hour; all constructed June 1, 2000 and equipped with one (1) fabric filter system (FF 4-11, baghouse 665L) to control particulate emissions;
 - (D) One (1) air separator, identified as Point 4-12A (664G), constructed June 1, 2000, with a nominal capacity of 230 tons per hour, and equipped with one (1) fabric filter system (FF 4-12, baghouse 664L) to control particulate emissions; and
 - (E) Two (2) weigh feeders, identified as Point 4-17 (652V, 653V), constructed January 1, 1969; and two (2) weigh feeders (650V, 651V), constructed January 1, 1969, equipped with two (2) dust collectors (650L, 651L), installed in 2000, venting indoors; with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 4-17) to control particulate emissions.

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

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

(k) Cement Storage, Loading, and Packaging Activities:

- (1) Three (3) Group 5 silos, identified as Point 5-1 (705A, 707A, 709A), constructed before 1971 and modified in 1999, with a nominal storage capacity of 10,000 tons each, with particulate emission controlled by one (1) fabric filter system (FF 5-1, baghouse 757L);
- (2) Three (3) Group 5 silos, identified as Point 5-2 (706A, 708A, 710A), constructed before 1971 and modified in 1999, with a nominal storage capacity of 10,000 tons each, with particulate emissions controlled by one (1) fabric filter systems (FF 5-2, baghouse 758L);
- (3) Two (2) Group 4 silos, identified as Point 5-3 (702A, 704A), constructed in 1967 and modified in 1999, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-3, baghouse 702L);
- (4) Two (2) Group 4 silos, identified as Point 5-4 (701A, 703A), constructed in 1967 and modified in 1999, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-4, baghouse 701L);
- (5) Two (2) silos, identified as Point 5-29 (711A, 712A), constructed in 1969, with a nominal storage capacity of 5,000 tons each, with particulate emissions controlled by one (1) fabric filter system (FF 5-29, baghouse 713L);
- (6) One (1) screen, identified as Point 5-5C (701G), constructed before 1971 and modified in 1999; and one (1) truck loader, identified as Point 5-5D (708L), constructed before 1971 and modified in 1999; each with a nominal capacity of 500 tons per hour, equipped with one (1) fabric filter system (FF 5-5, baghouse 703L) to control particulate emissions;
- (7) One (1) screen, identified as Point 5-6B (702G), constructed before 1971 and modified in 1999; and one (1) railcar/truck loader, identified as Point 5-6C (709L), constructed before 1971 and modified in 1999; each with a nominal capacity of 500 tons per hour, equipped with one (1) fabric filter system (FF 5-6, baghouse 706L) to control particulate emissions;
- (8) One (1) hopper, identified as Point 5-7B (701F), constructed before 1971 and modified in 1999, with a nominal capacity of 40 tons per hour, equipped with one (1) fabric filter system (FF 5-7, baghouse 710L) to control particulate emissions;
- (9) One (1) hopper, identified as Point 5-8 (730F), constructed before 1971 and modified in 1999, with a nominal capacity of 40 tons per hour, equipped with one (1) fabric filter system (FF 5-8, baghouse 715L) to control particulate emissions;

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

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

- (10) Three (3) screw conveyors, identified as Point 5-9A (809V, 809V1, 809V2), constructed before 1971, with a nominal capacity of 40 tons per hour each; one (1) alleviator, identified as Point 5-9C, constructed before 1971, with a nominal capacity of 40 tons per hour; and fourteen (14) Group 2 silos, identified as Point 5-9B (2S-7S, 9S, 11S-17S), constructed in 1924, with a combined nominal capacity of 24,842 tons; all equipped with one (1) fabric filter (FF 5-9, baghouse 808L) to control particulate matter;
- (11) One (1) silo, identified as Point 5-10 (8S), constructed in 1924 and modified in 1999, with a nominal capacity of 5420 tons, equipped with one (1) fabric filter system (FF 5-10, baghouse 807L) for particulate control;
- (12) One (1) silo, identified as Point 5-11 (10S), constructed in 1924 and modified in 1999, with a nominal capacity of 5420 tons, equipped with one (1) fabric filter system (FF 5-11, baghouse 810L) for particulate control;
- (13) Four (4) Group 3 silos, identified as Point 5-13 (26S, 27S, 28S, and 29S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,736 tons each, equipped with one (1) fabric filter system (FF 5-13, baghouse 27DC) to control particulate emissions;
- (14) Three (3) Group 3 silos, identified as Point 5-14 (18S, 20S, 22S), constructed in 1924 and modified in 1999, with a nominal capacity of 3,112 tons each, equipped with one (1) fabric filter system (FF 5-14, baghouse 22DC) to control particulate emissions;
- (15) Two (2) Group 3 silos, identified as Point 5-15 (24S, 30S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,780 tons each, equipped with one (1) fabric filter system (FF 5-15, baghouse 24DC) to control particulate emissions;
- (16) Four (4) Group 3 silos, identified as Point 5-17 (19S, 21S, 23S, 25S), constructed in 1924 and modified in 1999, with a nominal capacity of 2,736 tons each, equipped with one (1) fabric filter system (FF 5-17, baghouse 25DC) to control particulate emissions;
- (17) One (1) screens elevator, identified as Point 5-18 (829V2), constructed before 1971, with a nominal capacity of 40 tons per hour, covered by a building enclosure (BE 5-18) to control particulate emissions;
- (18) One (1) elevator, identified as Point 5-19 (829V1), constructed before 1971, with a nominal capacity of 40 tons per hour, covered by a building enclosure (BE 5-19) to control particulate emissions;
- (19) Two (2) bulk tanks, identified as Point 5-23A (831F, 833F), with a nominal capacity of 20 tons each; and one (1) truck loader, identified as Point 5-23C, with a nominal capacity of 40 tons per hour; all constructed before 1971 and modified in 1999, except for 831V2 which was constructed in 2003, and equipped with one (1) fabric filter system (FF 5-23, baghouse 833L) to control particulate emissions;

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

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

- (20) Three (3) bulk tanks, identified as Point 5-24A (832F, 834F, 835F), with a nominal capacity of 20 tons each, all constructed before 1950 and modified in 1999, and equipped with one (1) fabric filter system (FF 5-24, baghouse 835L) to control particulate emissions;
 - (21) One (1) silo, identified as Point 5-26A (782F), with a nominal capacity of 2,430 tons; and one (1) bucket elevator, identified as Point 5-26B (781V), with a nominal capacity of 500 tons per hour; all constructed December 1, 2000, and equipped with one (1) fabric filter system (FF 5-26, baghouse 782L) to control particulate emissions;
 - (22) One (1) lump breaker, identified as Point 5-27B (783V3); one (1) spout, identified as Point 5-27C (785L); and one (1) truck loader, identified as Point 5-27D; all constructed December 1, 2000, with a nominal capacity of 500 tons per hour each, and equipped with one (1) fabric filter system (FF 5-27, baghouse 783L) to control particulate emissions;
 - (23) One (1) lump breaker, identified as Point 5-28B (784V3); one (1) spout, identified as Point 5-28C (786L); and one (1) truck loader, identified as Point 5-28D; all constructed December 1, 2000, with a nominal capacity of 500 tons per hour each, and equipped with one (1) fabric filter system (FF 5-28, baghouse 784L) to control particulate emissions;
 - (24) Five (5) screw conveyors, identified as Point 5-30B (755V, 759V-762V), constructed in 1978; six (6) rotary feeders, identified as Point 5-30C (755M-760M), constructed in 1978; and one (1) hopper, identified as Point 5-30D (750F), constructed before August 17, 1971; with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 5-30) to control particulate emissions; and
 - (25) Nineteen (19) screw conveyors, identified as Point 5-33A (818V1-825V1, 818V2-825V2, 828V1, 828V2, 830V); and three (3) screen screws, identified as Point 5-33B (806V, 829V4, 830V1); all constructed before 1950, with a nominal capacity of 40 tons per hour each, and covered by a building enclosure (BE 5-33) to control particulate emissions.
- (l) One (1) blend facility, consisting of the following units:
- (1) Five (5) screw conveyors, identified as Point 5-35A (22SC, 24SCG, 24SC, 30SC, 31SC), all constructed in 1989, with a nominal capacity of 40 tons per hour each, covered by a building enclosure (BE 5-35) to control particulate emissions;
 - (2) One (1) transfer pod, identified as Point 5-36 (22) constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-36, filter 22-PVDC) to control particulate emissions;

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

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

- (3) One (1) transfer pod, identified as Point 5-37 (24-G), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-37, filter 24-PVDC-G) to control particulate emissions;
 - (4) One (1) transfer pod, identified as Point 5-38 (24), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-38, filter 24-PVDC) to control particulate emissions;
 - (5) One (1) transfer pod, identified as Point 5-39 (30), constructed in August 1989, with a nominal area of 25 cubic feet, equipped with one (1) fabric filter system (FF 5-39, filter 30-PVDC) to control particulate emissions;
 - (6) One (1) receiving tank, identified as Point 5-40, constructed in August 1989, with a nominal capacity of 20 tons, equipped with one (1) fabric filter system (FF 5-40, baghouse 40-DC) to control particulate emissions;
 - (7) One (1) blending tank, identified as Point 5-41A, with a nominal capacity of 20 tons; and one (1) blending pod, identified as Point 5-41C, with a nominal capacity of 25 cubic feet; all constructed in August 1989, equipped with one (1) fabric filter system (FF 5-41, baghouse 41-DC) to control particulate emissions;
 - (8) Two (2) silos, identified as Point 5-42 (50S, 51S), constructed August 1989, with a nominal capacity of 175 tons each, equipped with one (1) fabric filter system (FF 5-42, baghouse 50-DC) to control particulate emissions;
 - (9) Two (2) silos, identified as Point 5-43 (52S, 53S), constructed August 1989, with a nominal capacity of 175 tons each, equipped with one (1) fabric filter system (FF 5-43, baghouse 53-DC) to control particulate emissions; and
 - (10) One (1) transfer pod, identified as Point 5-44B (50PV), constructed in August 1989, with a nominal capacity of 40 tons per hour each, equipped with one (1) fabric filter system (FF 5-44, filter 50-PVDC) to control particulate emissions.
- (m) Packhouse operations consisting of the following:
- (1) One (1) elevator, identified as Point 6-1A (838V), constructed in 1945; one (1) packer bin, identified as Point 6-1B (Bin #1), constructed in 1946; one (1) packing machine, identified as Point 6-1C (842LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-1D (842F, 842FA), constructed in 1946; two (2) rotary feeders, identified as Point 6-1E (842M, 842MA), constructed in 1946; and four (4) screw conveyors, identified as Point 6-1F (842LV1, 837V, 837V1, 831V2), constructed in 1945; all modified in 1999, with a nominal capacity of 34 tons per hour, and equipped with one (1) fabric filter system (FF 6-1, baghouse 842L) for particulate control;

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

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

- (2) One (1) elevator, identified as Point 6-2A (838V1), constructed in 1945; one (1) packer bin, identified as Point 6-2B (Bin #2), constructed in 1946; one (1) packing machine, identified as Point 6-2C (843LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-2D (843F, 843FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-2E (843M, 843MA), constructed before 1971; and four (4) screw conveyors (843LV1, 817V1, 817V3, 817V7), identified as Point 6-2G; constructed in 1945; all modified in 1999, with a nominal capacity of 46 tons per hour, and equipped with one (1) fabric filter system (FF 6-2, baghouse 843L) for particulate control;
- (3) One (1) elevator, identified as Point 6-3A (838V2), constructed in 1945; one (1) packer bin, identified as Point 6-3B (Bin #3), constructed in 1946; one (1) packing machine, identified as Point 6-3C (844LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-3D (844F, 844FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-3E (844M, 844MA), constructed before 1971; and one (1) screw conveyor, identified as Point 6-3F (844LV1), constructed before 1971; all modified in 1999, with a nominal capacity of 65 tons per hour, and equipped with one (1) fabric filter system (FF 6-3, baghouse 844L) for particulate control;
- (4) One (1) elevator, identified as Point 6-4A (838V3), constructed in 1945; one (1) packer bin, identified as Point 6-4B (Bin #4), constructed in 1946; one (1) packing machine, identified as Point 6-4C (845LF), constructed in 1945; two (2) circulating tanks, identified as Point 6-4D (845F, 845FA), constructed in 1945; two (2) rotary feeders, identified as Point 6-4E (845M, 845MA), constructed before 1971; and one (1) screw conveyor, identified as Point 6-4F (845LV1), constructed before 1971; all and modified in 1999, with a nominal capacity of 40 tons per hour, and equipped with one (1) fabric filter system (FF 6-4, baghouse 845L) for particulate control;
- (5) Fourteen (14) conveyors, identified as Point 6-5 (842V-846V, 848V, 845V1, 847V1, 847V2, 848V1, 848V2, 849V1, 849V2, 849V3), constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6-5) to control particulate emissions;
- (6) Two (2) palletizers, identified as Point 6-6 (900H, 901H), constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6-6) to control particulate emissions; and
- (7) One (1) truck loader, identified as Point 6-7, constructed before 1971, with a nominal capacity of 185 tons per hour, covered by a building enclosure (BE 6-7) to control particulate emissions.

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

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

D.6.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, except when otherwise specified in 40 CFR 63, Subpart LLL, to the finish mill operations, cement storage, loading, and packaging activities, blend facility, and packhouse operations listed in Condition D.6.2.

D.6.2 Particulate Matter Emission Limitation [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63, Subpart LLL (NESHAP for the Portland Cement Industry), the visible emissions from the following units shall be less than 10% opacity:

Operations	Units	Emission Point
Finish Mill Operations	four (4) vibrating feeders (504-507V)	FF 3-15 (505L)
	four (4) vibrating feeders (501V-503V, 508V) one (1) belt conveyor (221V)	FF 3-17 (504L)
	two (2) belt conveyors (514V, 511V) one (1) bucket elevator (513V) one (1) belt conveyor (511V2)	FF 3-20 (513L)
	one (1) belt conveyor (515V) and four one (4) (1) silos (650A-653A) (652A) three (3) silos (650A, and 653A)	FF 4-13 (515L) 760L, 761L, 762
	one (1) belt conveyor (516V)	FF 4-14 (516L)
	two (2) belt conveyors (639V, 640V) one (1) clinker bin (601F) one (1) gypsum bin (603F) one (1) spill screw (646V) one (1) belt conveyor (614V)	FF 4-1 (617L)
	one (1) No. 1 finish mill (603G) one (1) elevator (626V) one (1) spill screw (642V)	FF 4-2 (613L)
	one (1) air separator (605G) one (1) tailing screw (613V) two (2) cement coolers (603C, 604C) one (1) F.K. pump hopper (611F) one (1) mill feed belt (641V) one (1) clinker F.O.W. belt (601V)	FF 4-3 (606L)
	one (1) fringe bin (604F) two (2) screw feeders (611V, 604F1V)	FF 4-16 (605L)
	one (1) weigh belt (605V) one (1) belt conveyor (616V)	Building Enclosure
	two (2) conveyor belts (639V, 640V) one (1) clinker bin (602F) one (1) gypsum bin (603F) one (1) clinker F.O.W. belt (602V) one (1) feed belt (644V)	FF 4-4 (636L)
	one (1) No. 2 finish mill (602G) one (1) spill screw (645V)	FF 4-5 (603L)
	one (1) air separator (604G) one (1) elevator (621V) one (1) tailing screw (612V) two (2) cement coolers (601C, 602C) one (1) F.K. pump hopper (610F) one (1) mill feed belt (644V)	FF 4-6 (602L)
	one (1) No. 3 finish mill (660G)	FF 4-9 (660L)
	one (1) hopper (667F) one (1) cooler (664C) one (1) feed belt (654V)	FF 4-10 (661L)
	one (1) fringe bin (665F) one (1) elevator (661V) one (1) rotary feeder (665FV)	FF 4-11 (665L)
	one (1) air separator (664G)	FF 4-12 (664L)
	two (2) weigh feeders (652V, 653V) two (2) weigh feeders (650V, 651V)	BE 4-17

Operations	Units	Emission Point
Cement Storage, Loading, and Packaging Activities	three (3) Group 5 silos (705A, 707A, 709A)	FF 5-1 (757L)
	three (3) Group 5 silos (706A, 708A, 710A)	FF 5-2 (758L)
	two (2) Group 4 silos (702A, 704A)	FF 5-3 (702L)
	two (2) Group 4 silos (701A, 703A)	FF 5-4 (701L)
	two (2) silos (711A, 712A)	FF 5-29 (713L)
	one (1) screen (701G) one (1) truck loader (708L)	FF 5-5 (703L)
	one (1) screen (702G) one (1) railcar/truck loader (709L)	FF 5-6 (706L)
	one (1) hopper (701F)	FF 5-7 (710L)
	one (1) hopper (730F)	FF 5-8 (715L)
	three (3) screw conveyors (809V, 809V1, 809V2) one (1) alleviator fourteen (14) Group 2 silos(2S-7S, 9S, 11S-17S)	FF 5-9 (808L)
	one (1) silo (8S)	FF 5-10 (807L)
	one (1) silo (10S)	FF 5-11 (810L)
	four (4) Group 3 silos (26S, 27S, 28S, and 29S)	FF 5-13 (27DC)
	three (3) Group 3 silos (18S, 20S, 22S)	FF 5-14 (22DC)
	two (2) Group 3 silos (24S, 30S)	FF 5-15 (24DC)
	four (4) Group 3 silos (19S, 21S, 23S, 25S)	FF 5-17 (25DC)
	one (1) screen elevator (829V2)	BE (5-18)
	one (1) elevator (829V1)	Be (5-19)
	two (2) bulk tanks (831F, 833F) one (1) truck loader	FF 5-23 (833L)
	three (3) bulk tanks (832F, 834F, 835F)	FF 5-24 (835L)
	one (1) silo (782F) one (1) bucket elevator (781V)	FF 5-26 (782L)
	one (1) lump breaker (783V3) one (1) spout (785L) one (1) truck loader	FF 5-27 (783L)
	one (1) lump breaker (784V3) one (1) spout (786L) one (1) truck loader	FF 5-28 (784L)
	five (5) screw conveyors (755V, 759V-762V) six (6) rotary feeders (755M-760M) one (1) hopper (750F)	BE (5-30)
nineteen (19) screw conveyors (818V1-825V1, 818V2-825V2, 828V1, 828V2, 830V) three (3) screen screws (806V, 829V4, 830V1)	BE (5-33)	

Operations	Units	Emission Point
Blend Facility	five (5) screw conveyors (22SC, 24SCG, 24SC, 30SC, 31SC)	BE (5-35)
	one (1) transfer pod (22)	FF 5-36 (22-PVDC)
	one (1) transfer pod (24-G)	FF 5-37 (24-PVDC-G)
	one (1) transfer pod (24)	FF 5-38 (24-PVDC)
	one (1) transfer pod (30)	FF 5-39 (30-PVDC)
	one (1) receiving tank	FF 5-40 (40-DC)
	one (1) blending tank one (1) blending pod	FF 5-41 (41-DC)
	two (2) silos (50S, 51S)	FF 5-42 (50-DC)
	two (2) silos (52S, 53S)	FF 5-43 (53-DC)
	one (1) transfer pod (50PV)	FF 5-44 (50-PVDC)
Packhouse Operations	one (1) elevator (838V) one (1) packer bin (Bin #1) one (1) packing machine (842LF) two (2) circulating tanks (842F, 842FA) two (2) rotary feeders (842M, 842MA) four (4) screw conveyors (842LV1, 837V, 837V1, 831V2)	FF 6-1 (842L)
	one (1) elevator (838V1) one (1) packer bin (Bin #2) one (1) packing machine (843LF) two (2) circulating tanks (843F, 843FA) two (2) rotary feeders (843M, 843MA) four (4) screw conveyors (843LV1, 817V1, 817V3, 817V7)	FF 6-2 (843L)
	one (1) elevator (838V2) one (1) packer bin (Bin #3) one (1) packing machine (844LF) two (2) circulating tanks (844F, 844FA) two (2) rotary feeders (844M, 844MA) one (1) screw conveyor (844LV1)	FF 6-3 (844L)
	one (1) elevator (838V3) one (1) packer bin (Bin #4), one (1) packing machine(845LF) two (2) circulating tanks (845F, 845FA) two (2) rotary feeders (845M, 845MA) one (1) screw conveyor (845LV1)	FF 6-4 (845L)
	fourteen (14) conveyors (842V-846V, 848V, 845V1, 847V1, 847V2, 848V1, 848V2, 849V1, 849V2, 849V3)	BE (6-5)
	two (2) palletizers (900H, 901H)	BE (6-6)
	one (1) truck loader	BE (6-7)

D.6.3 Particulate Matter Emission Limitation [326 IAC 2-2]

(a) Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the following limitations apply to the following units:

Units	Point	Filterable PM limits	Filterable PM10 Limits
four (4) vibrating feeders (504-507V)	FF 3-15 (505L)	0.015 gr/dscf 0.59 lbs/hr	0.015 gr/dscf 0.59 lbs/hr
four (4) vibrating feeders (501V-503V, 508V) one (1) belt conveyor (221V)	FF 3-17 (504L)	0.015 gr/dscf 0.59 lbs/hr	0.015 gr/dscf 0.59 lbs/hr
two (2) belt conveyors (639V, 640V) one (1) clinker bin (601F) one (1) gypsum bin (603F) one (1) spill screw (646V)	FF 4-1 (617L)	0.020 gr/dscf 1.12 lbs/hr	0.020 gr/dscf 1.12 lbs/hr

Units	Point	Filterable PM limits	Filterable PM10 Limits
one (1) No. 1 finish mill (603G) one (1) elevator (626V) one (1) spill screw (642V)	FF 4-2 (613L)	0.020 gr/dscf 2.07 lbs/hr	0.020 gr/dscf 2.07 lbs/hr
one (1) air separator (605G) one (1) tailing screw (613V) two (2) cement coolers (603C, 604C) one (1) F.K. pump hopper (611F) one (1) mill feed belt (641V) one (1) clinker F.O.W. belt (601V)	FF 4-3 (606L)	0.015 gr/dscf 9.64 lbs/hr	0.015 gr/dscf 9.64 lbs/hr
two (2) conveyor belts (639V, 640V) one (1) clinker bin (602F) one (1) gypsum bin (603F) one (1) clinker F.O.W. belt (602V) one (1) feed belt (644V)	FF 4-4 (636L)	0.015 gr/dscf 0.98 lbs/hr	0.015 gr/dscf 0.98 lbs/hr
one (1) No. 2 finish mill (602G) one (1) spill screw (645V)	FF 4-5 (603L)	0.020 gr/dscf 2.07 lbs/hr	0.020 gr/dscf 2.07 lbs/hr
one (1) air separator (604G) one (1) elevator (621V) one (1) tailing screw (612V), two (2) cement coolers (601C, 602C) one (1) F.K. pump hopper (610F) one (1) mill feed belt (644V)	FF 4-6 (602L)	0.020 gr/dscf 2.07 lbs/hr	0.020 gr/dscf 2.07 lbs/hr
one (1) No. 3 finish mill (660G)	FF 4-9 (660L)	0.010 gr/dscf 1.97 lbs/hr	0.010 gr/dscf 1.97 lbs/hr
one (1) hopper (667F) one (1) cooler (664C) one (1) feed belt (654V)	FF 4-10 (661L)	0.010 gr/dscf 0.55 lbs/hr	0.010 gr/dscf 0.55 lbs/hr
one (1) fringe bin (665F) one (1) elevator (661V) one (1) rotary feeder (665FV)	FF 4-11 (665L)	0.010 gr/dscf 0.36 lbs/hr	0.010 gr/dscf 0.36 lbs/hr
one (1) air separator (664G)	FF 4-12 (664L)	0.010 gr/dscf 6.43 lbs/hr	0.010 gr/dscf 6.43 lbs/hr
three (3) Group 5 silos (705A, 707A, 709A)	FF 5-1 (757L)	0.015 gr/dscf 12.86 lbs/hr	0.015 gr/dscf 12.86 lbs/hr
three (3) Group 5 silos (706A, 708A, 710A)	FF 5-2 (758L)	0.015 gr/dscf 12.86 lbs/hr	0.015 gr/dscf 12.86 lbs/hr
two (2) Group 4 silos (702A, 704A)	FF 5-3 (702L)	0.020 gr/dscf 1.88 lbs/hr	0.020 gr/dscf 1.88 lbs/hr
two (2) Group 4 silos (701A, 703A)	FF 5-4 (701L)	0.020 gr/dscf 0.45 lbs/hr	0.020 gr/dscf 0.45 lbs/hr
one (1) screen (701G) one (1) truck loader (708L)	FF 5-5 (703L)	0.020 gr/dscf 1.88 lbs/hr	0.020 gr/dscf 1.88 lbs/hr
one (1) screen (702G) one (1) railcar/truck loader (709L)	FF 5-6 (706L)	0.020 gr/dscf 0.45 lbs/hr	0.020 gr/dscf 0.45 lbs/hr
one (1) hopper (701F)	FF 5-7 (710L)	0.020 gr/dscf 0.45 lbs/hr	0.020 gr/dscf 0.45 lbs/hr
one (1) hopper (730F)	FF 5-8 (715L)	0.020 gr/dscf 1.88 lbs/hr	0.020 gr/dscf 1.88 lbs/hr
one (1) silo (8S)	FF 5-10 (807L)	0.015 gr/dscf 0.32 lbs/hr	0.015 gr/dscf 0.32 lbs/hr
one (1) silo (10S)	FF 5-11 (810L)	0.020 gr/dscf 0.36 lbs/hr	0.020 gr/dscf 0.36 lbs/hr
four (4) Group 3 silos (26S, 27S, 28S, and 29S)	FF 5-13 (27DC)	0.020 gr/dscf 0.28 lbs/hr	0.020 gr/dscf 0.28 lbs/hr
three (3) Group 3 silos (18S, 20S, 22S)	FF 5-14 (22DC)	0.020 gr/dscf 0.28 lbs/hr	0.020 gr/dscf 0.28 lbs/hr
two (2) Group 3 silos (24S, 30S)	FF 5-15 (24DC)	0.020 gr/dscf 0.28 lbs/hr	0.020 gr/dscf 0.28 lbs/hr

Units	Point	Filterable PM limits	Filterable PM10 Limits
four (4) Group 3 silos (19S, 21S, 23S, 25S)	FF 5-17 (25DC)	0.020 gr/dscf 0.28 lbs/hr	0.020 gr/dscf 0.28 lbs/hr
two (2) bulk tanks (831F, 833F) one (1) truck loader	FF 5-23 (833L)	0.020 gr/dscf 0.73 lbs/hr	0.020 gr/dscf 0.73 lbs/hr
three (3) bulk tanks (832F, 834F, 835F)	FF 5-24 (835L)	0.020 gr/dscf 0.73 lbs/hr	0.020 gr/dscf 0.73 lbs/hr
one (1) elevator (838V) one (1) packer bin (Bin #1) one (1) packing machine (842LF) two (2) circulating tanks (842F, 842FA) two (2) rotary feeders (842M, 842MA) four (4) screw conveyors (842LV1, 837V, 837V1, 831V2)	FF 6-1 (842L)	0.020 gr/dscf 0.13 lbs/hr	0.020 gr/dscf 0.13 lbs/hr
one (1) elevator (838V1) one (1) packer bin (Bin #2) one (1) packing machine (843LF) two (2) circulating tanks (843F, 843FA) two (2) rotary feeders (843M, 843MA) four (4) screw conveyors (843LV1, 817V1, 817V3, 817V7)	FF 6-2 (843L)	0.015 gr/dscf 0.93 lbs/hr	0.015 gr/dscf 0.93 lbs/hr
one (1) elevator (838V2) one (1) packer bin (Bin #3) one (1) packing machine (844LF) two (2) circulating tanks (844F, 844FA) two (2) rotary feeders (844M, 844MA) one (1) screw conveyor (844LV1)	FF 6-3 (844L)	0.015 gr/dscf 0.93 lbs/hr	0.015 gr/dscf 0.93 lbs/hr
one (1) elevator (838V3) one (1) packer bin (Bin #4), one (1) packing machine (845LF) two (2) circulating tanks (845F, 845FA) two (2) rotary feeders (845M, 845MA) one (1) screw conveyor (845LV1)	FF 6-4 (845L)	0.015 gr/dscf 0.93 lbs/hr	0.015 gr/dscf 0.93 lbs/hr

(b) Pursuant to 326 IAC 2-2 (PSD BACT), the following limitations apply:

Units	Point	Filterable PM Limits	PM10 Limits
two (2) belt conveyors (514V, 511V) one (1) bucket elevator (513V)	FF 3-20 (513L)	0.010 gr/dscf 0.64 lbs/hr	0.010 gr/dscf 0.64 lbs/hr
one (1) belt conveyor (51 5V) and four one (4) (1) silos (650A-653A) (652A) three (3) silos (650A, 651A, and 653A)	FF 4-13 (515L) 760L, 761L, 762L	0.010 gr/dscf 0.60 lbs/hr	0.010 gr/dscf 0.60 lbs/hr
one (1) silo (782F) one (1) bucket elevator (781V)	FF 5-26 (782L)	0.010 gr/dscf 0.67 lbs/hr	0.010 gr/dscf 0.67 lbs/hr
one (1) lump breaker (783V3) one (1) spout (785L) one (1) truck loader	FF 5-27 (783L)	0.010 gr/dscf 0.40 lbs/hr	0.010 gr/dscf 0.40 lbs/hr
one (1) lump breaker (784V3) one (1) spout (786L) one (1) truck loader	FF 5-28 (784L)	0.010 gr/dscf 0.40 lbs/hr	0.010 gr/dscf 0.40 lbs/hr

(c) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the emissions from the following units shall be limited as below:

Units	Point	PM/PM10 Limits
one (1) receiving tank	FF 5-40 (40-DC)	0.14 lbs/hr
one (1) blending tank one (1) blending pod	FF 5-41 (41-DC)	0.14 lbs/hr
two (2) silos (50S, 51S)	FF 5-42 (50-DC)	0.11 lbs/hr
two (2) silos (52S, 53S)	FF 5-43 (53-DC)	0.11 lbs/hr

- (d) In order to make the requirements of 326 IAC 2-2 (PSD) not applicable, the following emission units shall use the control methods listed in the table below:

Units	Control Method
five (5) screw conveyors (22SC, 24SCG, 24SC, 30SC, 31SC)	Building Enclosure (BE 5-35)
one (1) transfer pod (22)	Filter (22-PVDC)
one (1) transfer pod (24-G)	Filter (24-PVDC-G)
one (1) transfer pod (24)	Filter (24-PVDC)
one (1) transfer pod (30)	Filter (30-PVDC)
one (1) transfer pod (50PV)	Filter (50-PVDC)

D.6.4 Operation Standards [326 IAC 2-2]

Pursuant to CP133-10159-00002, issued on April 16, 1999, and 326 IAC 2-2 (Prevention of Significant Deterioration BACT), the Permittee shall comply with the following throughput limitations:

- (a) The clinker input rate to the No. 1 finish mill shall not exceed 517,942 tons per twelve (12) consecutive month period with compliance determined at the end of each month;
- (b) The clinker input rate to the No. 2 finish mill shall not exceed 517,942 tons per twelve (12) consecutive month period with compliance determined at the end of each month; and
- (c) The clinker input rate to the No. 3 finish mill shall not exceed 700,567 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

D.6.5 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Processes	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Finish Mill Operations, excluding the units venting through baghouses 505L, 504I, 513L, 515L, 760L, 761L, and 762L, 617L, 613L, 606L, 636L, 603L, 602L, 660L, 661L, 665L, and 664L	250	61.0
Cement Storage, Loading, and Packaging Activities, excluding the units venting through baghouses 757L, 807L, 810L, 27DC, 22DC, 24DC, 25DC, 833L, 835L, 782L, 783L, and 784L	500	69.0
Blend Facility Operations	40	42.5
Packhouse Operations, excluding the units venting through baghouses 842L, 843L, 844L, and 845L	185	57.7

NOTE: Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed that shown in this table, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

The limitations for these facilities were calculated using the following equations:

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

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

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

D.6.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices. If the Operations and Maintenance Plan required by Condition D.6.9 is developed in accordance with Section B - Preventive Maintenance Plan, then once it has been developed, the Operations and Maintenance Plan shall satisfy this condition.

Compliance Determination Requirements

D.6.7 Particulate Matter (PM) and PM10

- (a) In order to comply with Conditions D.6.2, D.6.3, and D.6.5, the baghouses for PM and PM10 control associated with the finish mill operations, the cement storage, loading, and packing activities, the blend facility, and the packhouse operations shall be in operation and control emissions from the facilities at all times when the 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.

D.6.8 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63, Subpart LLL]

- (a) In order to demonstrate compliance with Conditions D.6.2 and D.6.3(a) and pursuant to 40 CFR 63.1349, no later than five (5) years from the last valid compliance demonstration, the Permittee shall perform stack testing for finish mill baghouses 613L, 606L, 603L, 602L, 660L, and 661L utilizing methods as approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM10 includes filterable PM10 only.
- (b) In order to demonstrate compliance with Conditions D.6.3(b) and D.6.3(c), no later than 180 days after issuance of this Part 70 Permit, the Permittee shall perform PM and PM10 stack testing for the following emission points utilizing methods as approved by the Commissioner. PM10 includes filterable PM10 and condensible PM10.
 - (1) One of the emission points FF 3-20 (513L) or FF 4-13 (515L);
 - (2) One of the emission points FF 5-26 (782L), FF 5-27 (783L), or FF 5-28 (784L);
and
 - (3) One of the emission points FF 5-40 (40-DC), FF 5-41 (41-DC), FF 5-42 (50-DC),
or FF 5-43 (53-DC).

Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.6.9 NESHAP Monitoring Requirements [326 IAC 20] [40 CFR 63, Subpart LLL]

- (a) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall prepare a written operation and maintenance plan for the units listed in Condition D.6.2 by June 14, 2002, which is the compliance date for the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry. The plan shall include the following information:
 - (1) Procedures for proper operation and maintenance of the affected sources and associated air pollution control device(s) in order to meet the emissions limit in Condition D.6.2; and

- (2) Procedures to be used to periodically monitor the facilities listed in this section, which are subject to opacity standards under 40 CFR 63.1348 except for the finish mills. Such procedures must include the following provisions:
- (A) The Permittee shall conduct a monthly 1-minute visible emissions test of each affected source except for the finish mills, in accordance with 40 CFR 60, Appendix A, Method 22. The test must be conducted while the affected source is in operation.
 - (B) If no visible emissions are observed in six consecutive monthly test for any affected source, the Permittee may decrease the frequency of testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (C) If no visible emissions are observed during the semi-annual test for any affected source, the Permittee may decrease the frequency of testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual test, the Permittee shall resume testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.
 - (D) Except for the finish mills, if visible emissions are observed during any Method 22 test, the Permittee must conduct a 6-minute test of opacity in accordance with 40 CFR 60, Subpart A, Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.
 - (E) The requirement to conduct Method 22 visible emissions monitoring under this paragraph shall not apply to any totally enclosed conveying system transfer point, regardless of the location of the transfer point. "Totally enclosed conveying system transfer point" shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. The enclosures for these transfer points shall be operated and maintained as total enclosures on a continuing basis in accordance with the facility operations and maintenance plan.
 - (F) If any partially enclosed or unenclosed conveying system transfer point is located in a building, the Permittee shall have the option to conduct a Method 22 visible emissions monitoring test according to the requirements of paragraphs (A) through (E) of this section for each such conveying system transfer point located within the building, or for the building itself, according to paragraph (G) of this section.
 - (G) If visible emissions from a building are monitored, the requirements of paragraphs (A) through (E) of this section apply to the monitoring of the building, and the Permittee shall also test visible emissions from each side, roof and vent of the building for at least 1 minute. The test must be conducted under normal operating conditions.

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

- (b) Pursuant to 40 CFR 63.1350 (Monitoring Requirements), the Permittee shall monitor opacity from the finish mill operations by conducting daily visible emissions observations in accordance with the procedures of 40 CFR 60, Appendix A, Method 22. The Method 22 test shall be conducted while the affected source is operating at the representative

performance conditions. The duration of the Method 22 test shall be six minutes. If visible emissions are observed during any Method 22 visible emissions test, the Permittee must:

- (1) Initiate, within one (1) hour, the corrective actions specified in the site specific operations and maintenance plan developed in accordance with 40 CFR 63.1350(a)(1) and (a)(2); and
- (2) Within 24 hours of the end of the Method 22 test in which the visible emissions were observed, conduct a follow up Method 22 test of each stack from which visible emissions were observed during the pervious Method 22 test. If visible emissions are observed during the follow up Method 22 test from any stack from which visible emissions were observed during the previous Method 22 test, conduct a test in accordance with 40 CFR 60, Appendix A, Method 9. The duration of the Method 9 test shall be thirty minutes.

D.6.10 Visible Emissions Notations

- (a) Visible emission notations of the finish mill operations, the cement storage, loading, and packaging activities, the blend facility, and the packhouse operations stack exhausts shall be performed once per day 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 or 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.6.11 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with the finish mill operations, the cement storage, loading, and packaging activities, the blend facility, and the packhouse operations at least once per day when those processes are in operation. When for any one reading, the pressure drop across a baghouse is outside the normal range listed below:

Baghouse	Pressure Drop (inches of water)
505L, 504L, 513L, 515L, 516L, 617L, 613L, 606L, 636L, 603L, 602L, 660L, 661L, 665L, 664L 757L, 758L, 702L, 701L, 713L, 703L, 706L, 710L, 715L, 760L, 761L, 762L, 808L, 807L, 810L, 27DC, 22DC, 24DC, 25DC, 833L, 835L, 782L, 783L, 784L, 40-DC, 41-DC, 50-DC, 53-DC, 842L, 843L, 844L, 845L	1-8
664L	2-10

Note: Filters 22-PVDC, 24-PVDC-G, 24-PVDC, 30-PVDC and 50-PVDC are not baghouses and do not have pressure drop readings.

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or 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 or Exceedances, shall be considered a deviation from this permit.

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

D.6.12 Broken or Failed Bag Detection

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

Bag failure can be indicated by a significant drop in the baghouse's 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 2-7-5(3)] [326 IAC 2-7-19]

D.6.13 Record Keeping Requirements

- (a) To document compliance with Condition D.6.4, the Permittee shall maintain records of the clinker input to the No. 1 finish mill, the No. 2 finish mill, and the No. 3 finish mill in order to establish compliance with the limits established in Condition D.6.4.
- (b) To document compliance with Condition D.6.10, the Permittee shall maintain records of once per day visible emission notations of the baghouse stack exhausts. 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).
- (c) To document compliance with Condition D.6.11, the Permittee shall maintain once per day records of the pressure drop across the baghouses. 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).
- (d) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall maintain all records required by 40 CFR 63.1355. These records include the following:
 - (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR 63.1355(a) recorded in a form suitable and readily available for inspection and review as required by 40 CFR 63.10(b)(1).
 - (2) The Permittee shall maintain records for each affected source as required by 40 CFR 63.10(b)(2) and (3) including:
 - (A) All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9.
 - (B) All records of applicability determination, including supporting analyses.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.6.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.6.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).
- (b) To document compliance with 40 CFR 63, Subpart LLL, the Permittee shall report the information required by 40 CFR 63.1354, including, but not limited to the following:
- (1) The plan required by 40 CFR 63.1350 shall be submitted to IDEM, OAQ and U.S. EPA by June 14, 2002, which is the compliance date for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry.
 - (2) As required by 40 CFR 63.10(d)(2), the Permittee shall report the results of performance tests as part of the notification of compliance status, required in Section C - NESHAP Notification and Reporting Requirements.
 - (3) As required by 40 CFR 63.10(d)(3), the Permittee shall report the opacity results from tests required by 40 CFR 63.1349.
 - (4) As required by 40 CFR 63.10(d)(5), if actions taken by the Permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's startup, shutdown, and malfunction plan specified in 40 CFR 63.6(e)(3), the Permittee shall state such information in a semiannual report. Reports shall only be required if startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report may be submitted simultaneously with the excess emissions and continuous monitoring system performance reports.
 - (5) Pursuant to 40 CFR 63.10(d)(5)(ii), any time an action taken by the Permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) is not consistent with the procedures in the startup, shutdown, and malfunction plan, the Permittee shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan, by telephone call to the OAF Compliance Section at (317)233-5674 or facsimile (FAX) transmission at (317)233-6865. The immediate report shall be followed by a letter within 7 working days after the end of the event, certified by the Permittee, explaining the circumstances of the event, the reasons for not following the startup, shutdown, and malfunction plan, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.
- (c) In addition to being submitted to the address listed in Section C - General Reporting Requirements, all reports and the operation and maintenance plan submitted pursuant to 40 CFR 63, Subpart A shall also be submitted to the U.S. EPA at the following address:

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

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

SECTION D.7 FACILITY CONDITIONS - WASTE TANKS

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

- (n) Eight (8) above-ground, liquid organic waste tanks, identified as Tanks 1-8, all constructed in 1988, except for Tank 8 (Burn Tank #8), which was constructed in 1999, with a combined nominal storage capacity of 400,000 gallons, with VOC and HAP emissions controlled by an existing vapor balancing system and a closed vent, carbon adsorption vapor system that exhaust to the existing tank farm stack identified as S-001.

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

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

D.7.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR 60, Subpart A]

The provisions of 40 CFR 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facilities described in this section except when otherwise specified in 40 CFR 60, Subpart Kb.

D.7.2 Storage Tanks [326 IAC 12] [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984), the storage vessels shall be equipped with the following:

A closed vent system and control device meeting the following specifications 40 CFR 60.112b(a)(3):

- (a) The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections, as determine in part 60, subpart VV, 40 CFR 60.485(b).
- (b) The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.

D.7.3 General Provisions Relating to NESHAP [326 IAC 14-1] [40 CFR Part 61, Subpart A]

The provisions of 40 CFR Part 61, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 14-1, apply to the facilities described in this section except when otherwise specified in 40 CFR Part 61, Subpart FF.

D.7.4 National Emission Standard for Benzene Waste Operations [326 IAC 14] [40 CFR Part 61, Subpart FF]

Pursuant to 40 CFR 61.342(b), the Permittee shall manage each waste stream that contains benzene meeting the criteria specified in 40 CFR 61.340(b) in accordance with 40 CFR 61, Subpart FF - National Emissions Standard for Benzene Waste Operations, paragraphs 61.342(c) through (h).

- (a) Pursuant to 40 CFR 61.342(c)(1)(ii), the Permittee shall control air emissions from each tank in accordance with the applicable standards specified in 40 CFR 61.343(a) and an Agreed Order EPA-5-03-113(a)-05, issued on July 3, 2003. Pursuant to 40 CFR 61.343(a)(1), each tank shall be covered by a fixed roof and vented through a closed-vent system that routes all organic vapors vented from the tank to a control device in accordance with items (1) through (4) below.

- (1) The cover and all openings shall be designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h).
 - (2) Each opening shall be maintained in a closed, sealed position at all times that waste is in the tank except when it is necessary to use the opening for waste sampling or removal, or for equipment inspection, maintenance, or repair.
 - (3) Condition D.7.4(a)(2) does not apply if the cover and closed-vent system operate such that the tank is maintained at a pressure less than atmospheric pressure and the opening meets the following conditions:
 - (A) The purpose of the opening is to provide dilution air to reduce the explosion hazard,
 - (B) The opening is designed to operate with no detectable emissions as indicated by an instrument reading of less than 500 ppmv above background, as determined initially and thereafter at least once per year by the methods specified in 40 CFR 61.355(h) and Condition D.7.7(c); and
 - (C) The pressure is monitored continuously to ensure that the pressure in the tank remains below atmospheric pressure.
 - (4) The closed-vent system and carbon adsorption vapor system shall be designed to operate in accordance with 40 CFR 61.349 and Condition D.7.5.
- (b) Pursuant to 40 CFR 61.342(c)(1)(ii), the Permittee shall control air emissions from each container in accordance with the applicable standards specified in 40 CFR 61.345.
- (1) The Permittee shall install, operate, and maintain a cover on each container used to handle, transfer, or store waste in accordance with the following requirements:
 - (A) The cover and all openings shall be designed to operate with no detectable emissions in accordance with 40 CFR 61.355(h) and Condition D.7.7(c).
 - (B) Each opening shall be maintained in a closed, sealed position when waste is in the container, except when it is necessary to use the opening for waste loading, removal, inspection, or sampling, except as provided in Condition D.7.4(b)(4).
 - (2) When transferring waste into a container by pumping, the Permittee shall perform the transfer using a submerged fill pipe as specified in 40 CFR 61.345(a)(2).
 - (3) Treatment of waste in a container as specified in 40 CFR 61.345(a)(3) shall route all organic vapors vented from the container through a closed-vent system to the carbon adsorption vapor system.
 - (A) The cover and all openings shall be designed to operate with no detectable emissions in accordance with 40 CFR 61.355(h) and Condition D.7.7(c).
 - (B) The closed-vent system and carbon adsorption vapor system shall be designed to operate in accordance with 40 CFR 61.349 and Condition D.7.5.

- (4) Condition D.7.4(b)(1)(B) and Condition D.7.4(b)(2) do not apply if the cover and closed-vent system operate such that the tank is maintained at a pressure less than atmospheric pressure and the opening meets the following conditions:
- (A) The purpose of the opening is to provide dilution air to reduce the explosion hazard;
 - (B) The opening is designed to operate with no detectable emissions in accordance with 40 CFR 61.355(h) and Condition D.7.7(c); and
 - (C) The pressure is monitored continuously to ensure that the pressure in the tank remains below atmospheric pressure.

D.7.5 Standards: Closed-Vent Systems and Carbon Adsorption Vapor System [326 IAC 14] [40 CFR Part 61, Subpart FF] [40 CFR 61.349]

The provisions of 40 CFR 61.349 apply to the closed-vent system and the carbon adsorption vapor system used to control air emissions from the tanks and containers with conditions for which 40 CFR 61.343(a) and 61.345(a)(3) applies. The Permittee shall meet the requirements specified in items (a) and (b) below.

- (a) Pursuant to 40 CFR 61.349(a), the Permittee shall meet the following requirements for the closed-vent system and carbon adsorption vapor system used to comply with 40 CFR 61.343 and 61.345:
 - (1) The Permittee shall properly design, install, operate, and maintain the closed-vent system in accordance with the following requirements:
 - (A) The closed-vent system shall be designed to operate with no detectable emissions in accordance with 40 CFR 61.355(h) and Condition D.7.7(c).
 - (B) Vent systems that contain a bypass line shall install, maintain, and operate according to manufacturer's specifications a flow indicator as specified in 61.349(a)(1)(ii).
 - (C) All gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.
 - (D) Devices use by the closed-vent system that vent directly to the atmosphere shall remain in a closed, sealed position during normal operations except when the device needs to open to prevent physical damage or permanent deformation of the closed-vent system resulting from malfunction of the unit in accordance with good engineering and safety practices for handling flammable, explosive, or other hazardous materials.
 - (2) Pursuant to 40 CFR 61.349(a)(2)(ii), the Permittee shall maintain a carbon adsorption vapor system designed and operated to control the organic emissions vented to it with an efficiency of 95 weight percent or greater.
- (b) Pursuant to 40 CFR 61.349(b), the closed-vent system and carbon adsorption vapor system shall be operated at all times when waste is placed in the waste management unit vented to the control device except when maintenance or repair of the waste management unit cannot be completed without a shutdown of the control device.

D.7.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Compliance Determination Requirements

D.7.7 Leak Detection Testing Requirements [326 IAC 2-7-6(1)] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]

- (a) When equipment is tested for compliance with or monitored for no detectable emissions in accordance with the standard for pressure relief devices in 40 CFR 61.242-4 and closed-vent system in 40 CFR 61.242-11, the Permittee shall comply with the requirements in 40 CFR 61.245(c).
- (b) Pursuant to 40 CFR 61.242-1(b), compliance with 40 CFR 61, Subpart V, will be determined by a review of records, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 61.245.
- (c) Pursuant to 40 CFR 61, Subpart FF, the Permittee must demonstrate no detectable emissions from the cover and all openings in waste management units by performing a test in accordance with 40 CFR 61.355(h) at least once per year.

D.7.8 Carbon Adsorption Vapor System Compliance Determination Requirements [326 IAC 2-7-6(1)] [40 CFR 61, Subpart FF]

Pursuant to 40 CFR 61.349(c)(1), the Permittee shall demonstrate that the activated carbon canister system achieves the conditions specified in 40 CFR 61.349(a)(2)(ii) and D.7.3(a)(2) by performing a design analysis that includes the items specified in 61.356(f)(2) and as follows:

- (a) Pursuant to 40 CFR 61.356(f)(2)(i), the design analysis shall include, but is not limited to, specifications, drawings, schematics, and piping and instrumentation diagrams prepared by the Permittee, or the control device manufacturer or vendor that describe the activated carbon canister system design based on acceptable engineering texts; and
- (b) The design analysis shall address the vent stream composition, constituent concentration, flow rate, relative humidity, and temperature. The design analysis shall also establish the design exhaust vent stream organic compound concentration level, capacity of carbon bed, type and working capacity of activated carbon used for carbon bed, and the total carbon working capacity of the control device and source operating schedule.
- (c) Pursuant to 40 CFR 61.342(g), compliance with 40 CFR part 61, Subpart FF will be determined by review of facility records and results from tests and inspections using methods and procedures specified in 40 CFR 61.355.

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

D.7.9 Monitoring Procedures for Tanks [326 IAC 2-7-6(1)] [40 CFR 61, Subpart FF]

The Permittee shall inspect and repair defects for each tank in which the waste stream is placed as follows:

- (a) Pursuant to 40 CFR 61.343(c), the Permittee shall inspect each fixed-roof, seal, access door, and all other openings by visual inspection initially and quarterly thereafter to ensure no cracks or gaps occur and that access doors and other openings are closed and gasketed properly.
- (b) The Permittee shall repair all detected defects, in accordance with 40 CFR 61.343(d) and 40 CFR 61.350, as follows:
 - (1) The Permittee shall make a first effort to repair broken seals or gaskets or other problems identified as soon as practicable, but not later than 45 calendar days after identification.
 - (2) Repair of defects may be delayed beyond 45 calendar days if completion of the repair is technically impossible without a complete or partial facility or unit

shutdown. Repair of such equipment shall occur before the end of the next facility or unit shutdown.

D.7.10 Monitoring Procedures for Containers [326 IAC 2-7-6(1)] [40 CFR 61, Subpart FF]

- (a) Pursuant to 40 CFR 61.345(b), the Permittee shall visually inspect each cover and all openings initially and quarterly thereafter to ensure that they are closed and gasketed properly.
- (b) The Permittee shall repair all detected defects, in accordance with 40 CFR 61.345(c) and 40 CFR 61.350, as follows:
 - (1) The Permittee shall make a first effort to repair broken seals or gaskets or other problems identified as soon as practicable, but not later than 15 calendar days after identification.
 - (2) Repair of defects may be delayed beyond 15 calendar days if completion of the repair is technically impossible without a complete or partial facility or unit shutdown. Repair of such equipment shall occur before the end of the next facility or unit shutdown.

D.7.11 Monitoring Procedures for Carbon Adsorption Vapor System and Closed-Vent System [326 IAC 2-7-6(1)] [40 CFR 61, Subpart FF]

- (a) Pursuant to 40 CFR 61.349(h) and 40 CFR 61.354(d), the Permittee shall ensure that the carbon adsorption vapor system operates properly in accordance with the performance specifications in D.7.4 by monitoring the carbon adsorption vapor system in accordance with all of the following requirements:
 - (1) The Permittee shall install and operate a device to monitor the concentration level of the organic compounds in the exhaust vent stream from the carbon adsorption vapor system on a regular schedule.
 - (2) Existing carbon shall be replaced with fresh carbon immediately when carbon breakthrough is indicated.
 - (3) The device shall be monitored on a daily basis.
 - (4) The monitoring system shall be installed, calibrated, maintained, and operated according to the manufacturer's specifications.
- (b) The Permittee shall visually inspect the bypass line valve at least once every month to ensure that the valve is maintained in the closed position and readings from the flow monitoring device at least once each operating day as specified in 40 CFR 61.354(f) and Condition D.7.4.
- (c) The Permittee using a system for emission control that is maintained at a pressure less than atmospheric pressure shall monitor the pressure with a device equipped with a continuous recorder as specified in 40 CFR 61.354(g).
- (d) The closed-vent system and the carbon adsorption vapor system shall be visually inspected quarterly in accordance with 40 CFR 61.349(f).
- (e) The Permittee shall repair all detected defects, in accordance with 40 CFR 61.349(g) and 40 CFR 61.350, as follows:
 - (1) The Permittee shall make a first effort to repair the closed-vent system and carbon adsorption vapor system as soon as practicable, but no later than 5 calendar days after detection and repair shall be completed no later than 15 calendar days after detection.

- (2) Repair of defects may be delayed beyond 15 calendar days if completion of the repair is technically impossible without a complete or partial facility or unit shutdown. Repair of such equipment shall occur before the end of the next facility or unit shutdown.

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

D.7.12 Record Keeping Requirements

- (a) To demonstrate compliance with Condition D.7.2 and 40 CFR 60, Subpart Kb, the Permittee shall keep a record of the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (b) Pursuant to 40 CFR 61.356(a), the Permittee shall maintain each record in accordance with Section C - General Record Keeping Requirements.
- (c) Pursuant to 40 CFR 61.356(b), the Permittee shall maintain records that identify each waste stream at the facility subject to 40 CFR 61, Subpart FF, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with 40 CFR 61, Subpart FF.
- (d) Pursuant to 40 CFR 61.356(b)(1), for each waste stream not controlled for benzene emissions in accordance with 40 CFR 61, Subpart FF, the Permittee shall keep records that include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.
- (e) Pursuant to 40 CFR 61.356(d), the Permittee shall maintain engineering design documentation for all control equipment that is installed on the waste management unit. The documentation shall be retained for the life of the control equipment.
- (f) Pursuant to 40 CFR 61.356(g), the Permittee shall maintain the following records:
 - (1) For tanks using a fixed roof to comply with the tank control requirements specified in 40 CFR 61.343(a) and Condition D.7.4(a), a record of each visual inspection required by 40 CFR 61.343(c) and Condition D.7.9 that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions.
 - (2) For containers using a cover to comply with the container control requirements specified in 40 CFR 61.345(a) and Condition D.7.4(b), a record of each visual inspection required by 40 CFR 61.345(b) and Condition D.7.10 that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions.
 - (3) Each record required by paragraphs (1) and (2) shall include the date of the inspection, waste management unit and control equipment location where the problem is identified, a description of the problem, a description of the corrective action taken, and the date the corrective action was completed.
- (g) The Permittee shall maintain a record of each test of no detectable emissions required by 40 CFR 61.343(a), 40 CFR 61.345(a), Condition D.7.4(a), and Condition D.7.4(b) as specified in 40 CFR 61.356(h).
- (h) Pursuant to 40 CFR 61.356(m), if the cover and closed-vent system operate such that the tank or container is maintained at a pressure less than atmospheric pressure as allowed in Condition D.7.4 then the Permittee shall maintain records of all periods during which the pressure in the unit is operated at a pressure greater than atmospheric pressure.

- (i) Pursuant to 40 CFR 61.356(f), the Permittee shall maintain the following records for the closed-vent and carbon adsorption vapor system for the life of the system:
 - (1) A statement, signed and dated by the Permittee, certifying that the closed-vent system and carbon adsorption vapor system is designed to operate at the documented performance level when the waste management unit vented to the carbon adsorption vapor system is or would be operating at the highest load or capacity expected to occur.
 - (2) For the carbon adsorption vapor system, records of the design analysis required in Condition D.7.8.
- (j) The Permittee shall maintain a record for each visual inspection required by 40 CFR 61.343 and 61.345 that identifies a problem (such as a broken seal, gap or other problem) which could result in benzene emissions as specified in 40 CFR 61.356(g).
- (k) The Permittee shall maintain a record of each test of no detectable emissions required by 40 CFR 61.349(a) and Condition D.7.5(a) as specified in 40 CFR 61.356(h).
- (l) Pursuant to 40 CFR 61.356(j), the Permittee shall maintain documentation that includes the following information regarding the control device operation:
 - (1) Dates of startup and shutdown of the closed-vent system and carbon adsorption vapor system.
 - (2) A description of the operating parameters to be monitored as specified in 40 CFR 61.356 (j)(2). This documentation shall be kept for the life of the control device.
 - (3) Pursuant to 40 CFR 61.356(j)(3), periods when the closed-vent system and carbon adsorption vapor system are not operated as designed including all periods and the duration when any valve car-seal or closure mechanism is broken or the by-pass line valve has changed and when the flow monitoring devices indicate that vapors are not routed to the control device as required.
 - (4) Records from the monitoring device of the concentration of organics in the carbon adsorption vapor system outlet gas stream as specified in 40 CFR 61.356(j)(9).
 - (5) Records of the dates and times when the carbon adsorption vapor system is monitored, when breakthrough is measured, and the date and time the existing carbon is replaced with fresh carbon as specified in 40 CFR 61.356(j)(10).
- (m) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.7.13 Reporting Requirements

- (a) Pursuant to 40 CFR 61.357, the Permittee shall submit to the US EPA and IDEM, OAQ an annual report containing the following information:
 - (1) Information updating the report originally submitted pursuant to 40 CFR 61.357 (a)(1) through (a)(3), or a statement that the information has not changed from the following year as specified in 40 CFR 61.357(d)(2).
 - (2) Summary of all inspections required by condition D.7.9 and D.7.10 during which detectable were measure or a problem that could result in benzene emissions was identified, including information about the repairs or corrective action taken as specified in 40 CFR 61.357(d)(8).
- (b) Pursuant to 40 CFR 61.357, the Permittee shall submit to the US EPA and IDEM, OAQ a quarterly report containing the following information:

- (1) A certification that all the required inspections have been carried out as required by condition D.7.9 and D.7.10 as specified in 40 CFR 61.357(d)(6).
- (2) Each 3-hour period of operation during which the average concentration of organics in the exhaust gases from the carbon adsorption vapor system is more than 20 percent greater than the design concentration level of organics in the exhaust gas as specified in 40 CFR 61.357(d)(7)(iv)(D).
- (3) Identifies any period in which the pressure in the waste management unit is equal to or greater than atmospheric pressure if the cover and closed-vent system operate in this manner as specified in 40 CFR 61.357(d)(7)(v).

SECTION D.8 FACILITY OPERATION CONDITIONS - INSIGNIFICANT ACTIVITIES

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

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment [326 IAC 6-3-2];
- (b) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent [326 IAC 6-3-2];
- (c) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone [326 IAC 6-3-2]; and
- (d) Conveyors as follows [326 IAC 6-3-2]:
 - (1) Covered conveyors for coal or coke conveying or less than or equal to 360 tons per day;
 - (2) Covered conveyors for limestone conveying of less than or equal to 7,200 tons per day for sources other than mineral processing plants constructed after August 31, 1983;
 - (3) Uncovered coal conveying of less than or equal to 120 tons per day; and
 - (4) Underground conveyors; and
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6 [326 IAC 8-3-2] [326 IAC 8-3-5].
- (f) One (1) non-hazardous waste alternate fuels handling process, identified as Point 2-18, approved for construction in 2007, with a maximum capacity of 10 tons of non-hazardous waste alternate fuel per hour, consisted of the following: [326 IAC 6-3-2]
 - (1) Two (2) hoppers, identified as 295F and 296F.
 - (2) Two (2) screw conveyors, identified as 295V and 296V.
 - (3) Two (2) weight feeders, identified as 295V1 and 296V1.
 - (4) Three (3) covered drag chain conveyors, identified as 296DCC, 297DCC, and 298DCC.
 - (5) Two (2) bucket elevators, identified as 296BE and 297BE.
- (g) Storage piles for non-hazardous waste alternate fuels, located inside a three-sided building, with a total maximum throughput rate of 10 tons/hr. [326 IAC 6-4]

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

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

D.8.1 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), Particulate emissions from the listed facilities (a) through (d), and (f) shall not exceed the pounds per hour limitation calculated using the following equation:

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

D.8.2 Cold Cleaner Operations [326 IAC 8-3-2]

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

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

D.8.3 Cold Cleaner Degreaser Operation and Control [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs and constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning facility constructed after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <p><input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none">• 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

Part 70 Quarterly Report When Combusting Only Fuel Oil

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002
Facility: Coal Mill Fuel Oil Fired Burner
Parameter: Sulfur Dioxide (SO₂) from fuel oil combustion
Limit: 0.5 pounds per million Btu heat input

FACILITY: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report When Combusting Only Fuel Oil

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002
Facility: Kiln
Parameter: Sulfur Dioxide (SO₂) from fuel oil combustion
Limit: 0.5 pounds per million Btu heat input

FACILITY: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report When Combusting Coal

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002
Facility: Kiln
Parameter: Sulfur Dioxide (SO₂) from coal combustion
Limit: 6.0 pounds per million Btu heat input

FACILITY: _____ YEAR: _____

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

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

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
 Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
 Part 70 Permit No.: T133-6927-00002
 Facility: Quarry Activities, Raw Material Sizing, Ball Mill Operation, Fly Ash Storage Activities, and Coal Mill Operation
 Parameter: Production
 Limit: See table below

YEAR:

Month	Production Facility	Column 1	Column 2	Column 1 + Column 2	Production Limit, tons per twelve (12) consecutive month period
		This Month	Previous 11 Months	3 Month Total	
Month 1	Overburden Material				1.2 million overburden
	Input to Primary Crusher				2,262,479 limestone
	Input to Secondary Crusher				2,574,685 slag, bottom ash, sand, shale, limestone, and alternate raw materials
	Input to Coal Mill				313,552 coal
	Fly Ash Input to Kiln				135,289 fly ash
Month 2	Overburden Material				1.2 million overburden
	Input to Primary Crusher				2,262,479 limestone
	Input to Secondary Crusher				2,574,685 slag, bottom ash, sand, shale, limestone, and alternate raw materials
	Input to Coal Mill				313,552 coal
	Fly Ash Input to Kiln				135,289 fly ash
Month 3	Overburden Material				1.2 million overburden
	Input to Primary Crusher				2,262,479 limestone
	Input to Secondary Crusher				2,574,685 slag, bottom ash, sand, shale, limestone, and alternate raw materials
	Input to Coal Mill				313,552 coal
	Fly Ash Input to Kiln				135,289 fly ash

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
 Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
 Part 70 Permit No.: T133-6927-00002
 Facility: Kiln Operations
 Parameter: Production
 Limit: See table below

YEAR:

Month	Production Facility	Column 1	Column 2	Column 1 + Column 2	Production Limit, tons per twelve (12) consecutive month period
		This Month	Previous 11 Months	12 Month Total	
Month 1	Kiln Raw Material Input				3,149,427 raw feed
	Total Coal Input				313,552 coal
	Clinker Production				1,606,000 clinker
Month 2	Kiln Raw Material Input				3,149,427 raw feed
	Total Coal Input				313,552 coal
	Clinker Production				1,606,000 clinker
Month 3	Kiln Raw Material Input				3,149,427 raw feed
	Total Coal Input				313,552 coal
	Clinker Production				1,606,000 clinker

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
 Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
 Part 70 Permit No.: T133-6927-00002
 Facility: Finish Mill Operations
 Parameter: Production
 Limit: See table below

YEAR:

Month	Production Facility	Column 1	Column 2	Column 1 + Column 2	Production Limit, tons per twelve (12) consecutive month period
		This Month	Previous 11 Months	12 Month Total	
Month 1	Input to No. 1 Finish Mill				517,942 clinker
	Input to No. 2 Finish Mill				517,942 clinker
	Input to No. 3 Finish Mill				700,567 clinker
Month 2	Input to No. 1 Finish Mill				517,942 clinker
	Input to No. 2 Finish Mill				517,942 clinker
	Input to No. 3 Finish Mill				700,567 clinker
Month 3	Input to No. 1 Finish Mill				517,942 clinker
	Input to No. 2 Finish Mill				517,942 clinker
	Input to No. 3 Finish Mill				700,567 clinker

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Source Address: 3301 South County Rd 150 West, Greencastle, Indiana 46135
 Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
 Part 70 Permit No.: T133-6927-00002
 Facility: Clinker Resizing Operation
 Parameter: Clinker Throughput
 Limit: The throughput to clinker resizing operation shall not exceed 50,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Source Address: 3301 South County Rd 150 West, Greencastle, Indiana 46135
 Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
 Part 70 Permit No.: T133-6927-00002
 Facility: Truck Unloading, Pneumatic Conveyance, Silo Loading, Kiln Loading
 Parameter: Pot Liner Throughput
 Limit: The throughput shall not exceed 35,040 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

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

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

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

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

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Road 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Attachment A

FUGITIVE DUST CONTROL PLAN

**Lone Star Industries, Inc. dba Buzzi Unicem USA
3310 South County Road 150 West
Greencastle, Indiana 46135**

The following equipment and operating procedures will be implemented to control fugitive dust:

- (a) A mechanical street sweeper is located on site and normally services all of the paved surfaces associated with plant vehicle traffic on a daily basis during periods when there is an elevated blowing road dust potential. This would be expected to cover summer time operations generally, other than rainfall days.
- (b) A water spray tanker is also available at the plant and normally services all of the unpaved surfaces associated with quarry vehicle traffic or maintenance truck traffic on a daily basis during the same periods.
- (c) Speed limit signs are posted alerting truckers and other personnel to limit vehicle speeds associated with incoming truck traffic for coal deliveries, sand and gypsum deliveries, and other material received in bulk. Limits also apply to automobile and truck traffic from visitors, maintenance and service companies, employees, etc.
- (d) The mean speed limit for quarry haul truck traffic during periods with high blowing road dust potential have been established at 9.6 miles per hour.
- (e) Quarry overburden removal, drilling, and blasting operations are not conducted on a continuous basis. During periods of high blowing dust potential, an evaluation will be conducted toward possibilities for rescheduling the work or arranging for additional water spray application to the affected areas.

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

**Addendum to the Technical Support Document
for a Significant Permit Modification to a Part 70 Operating Permit**

Source Background and Description

Source Name:	Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Location:	3301 South County Road 150 West, Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3241, 1422
Significant Permit Modification No.:	133-25460-00002
Permit Reviewer:	ERG/ST

On November 20, 2007, the Office of Air Quality (OAQ) had a notice published in the Banner Graphic, Greencastle Indiana, stating that Lone Star Industries, Inc. dba Buzzi Unicem USA had applied for a Significant Permit Modification to their Part 70 Operating Permit. The notice also stated that OAQ proposed to issue a permit modification 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.

On December 10, 2007, Lone Star Industries, Inc. dba Buzzi Unicem USA submitted comments on the proposed Significant Permit Modification to their Part 70 Operating Permit. The summary of the comments is as follows. Deleted language is shown in strikethrough.

Comment 1: There are no railcar operations associated with the delivery and off-loading of spent pot liner. Please remove this from the facility descriptions in conditions A.2 and D.2 and from the particulate requirement in condition D.2.3(f).

IDEM Response to Comment 1: The descriptions of the facilities to be added in this modification have been changed as follows:

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

...

- (o) One (1) truck ~~and railcar~~ unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.

- (p) One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.

SECTION D.2 FACILITY OPERATION CONDITIONS - GYPSUM MATERIAL HANDLING PROCESS, RAW MATERIAL BALL MILL OPERATION, FLY ASH STORAGE ACTIVITIES

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

...

- (o) One (1) truck ~~and railcar~~ unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.
- (p) One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.

D.2.3 Particulate Matter Emission Limitation [326 IAC 2-2]

...

- (f) In order to render PSD not applicable to the modification permitted in MSM 133-25345-00002, the Permittee shall limit emissions as follows:
 - (1) The throughput of spent pot liner shall be less than 35,040 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
 - (2) The PM10 emissions from the truck ~~and railcar~~ unloading operation (240F) shall be limited to less than 0.4 pounds per ton of material unloaded and transferred to the silo.
 - (3) The PM10 emissions from the enclosed pneumatic conveyance system (241F) shall be limited to less than 0.4 pounds per ton of material transferred to the kiln.

Comment 2: The Air Pollution Control Justification section of the Technical Support Document states that Lone Star Industries (LSI) submitted information claiming monetary loss from fuel and avoidance of cleanup cost as justification for determining the dust collectors as integral to the process. LSI did not submit the information as stated. LSI stated that other rules, with or without air pollution rules, dictate that LSI contain all hazardous waste below a minimum threshold. The Resource Conservation and Recovery Act requires that LSI contain this hazardous waste. LSI disagrees with IDEM's evaluation that the dust collectors are not integral to the process. Does IDEM have a non-rule policy on determining if a control device is integral to process?

IDEM Response to Comment 2: IDEM follows the guidance from US EPA, including the memorandum issued on November 27, 1995 titled "Criteria for Determining Whether Equipment is Air Pollution Control Equipment or Process Equipment" in its evaluation of control equipment as being integral to the process. The primary determinants are as follows:

1. The Process Can Not Operate Without the Control Equipment.
2. The Control Equipment Serves a Primary Purpose Other than Pollution Control.

3. The Control Equipment Has an Overwhelming Positive Net Economic Effect.

In the case of the dust collectors controlling emissions of hazardous waste from the unloading and silo loading operations, the process can operate without the collectors, albeit inefficiently. The primary purpose of the dust collectors is to comply with pollution control regulations in federal statutes (the Resource Conservation and Recovery Act) and state statutes (326 IAC 6-3-2). Therefore, IDEM deems that the dust collectors are not integral to the operations.

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

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

**Technical Support Document (TSD) for a
Part 70 Minor Source Modification and a
Part 70 Significant Permit Modification**

Source Description and Location

Source Name:	Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Location:	3301 South County Road 150 West, Greencastle, Indiana 46135
County:	Putnam
SIC Code:	3241, 1422
Operation Permit No.:	T133-6927-00002
Operation Permit Issuance Date:	April 14, 2004
Minor Source Modification No.:	133-25345-00002
Significant Permit Modification No.:	133-25460-00002
Permit Reviewer:	ERG/ST

Existing Approvals

The source was issued Part 70 Operating Permit No. 133-6927-00002 on April 14, 2004. The source has since received the following approvals:

- (a) First Minor Permit Modification 133-19255-00002, issued on September 20, 2005;
- (b) First Administrative Amendment 133-21744-00002, issued on October 28, 2005;
- (c) Second Administrative Amendment 133-22491-00002, issued on February 13, 2006;
- (d) Third Administrative Amendment 133-23605-00002, issued on December 7, 2006;
- (e) Second Minor Permit Modification 133-23892-00002, issued on May 7, 2007;
- (f) First Minor Source Modification 133-24896-00002, issued August 17, 2007;
- (g) Significant Permit Modification 133-24198-00002, issued on September 7, 2007; and
- (h) Third Minor Permit Modification 133-25090-00002, issued on October 16, 2007.

County Attainment Status

The source is located in Putnam County.

Pollutant	Status
PM10	Attainment
PM2.5	Attainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: 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.

- (a) Putnam County has been classified as attainment for PM2.5. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM 2.5 emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as a surrogate for PM2.5 emissions.
- (b) Volatile organic compounds (VOC) emissions 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 and NOx emissions are considered when evaluating the rule applicability relating to ozone. Putnam County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Putnam 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.
- (d) Fugitive Emissions
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 (i.e., portland cement plants), fugitive emissions are counted toward the determination of PSD applicability.

Source Status

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

Pollutant	Emissions (tons/year)
PM	356
PM10	331
SO ₂	3,326
VOC	19.2
CO	2,940
NO _x	4,402
Single HAP	Greater than 10
Total HAPs	Greater than 25

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2) because at least one of the regulated pollutants is emitted at a rate of 100 tons per year or more, and it is in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) These emissions are based upon the technical support document (TSD) for T133-6927-00002 issued on April 14, 2004.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Actual Emissions

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

Pollutant	Emissions (tons/year)
PM	68
PM10	68
SO ₂	196
VOC	0.0
CO	509
NO _x	1,695
A Single HAP	Not Reported
Total HAP	Not Reported

Air Pollution Control Justification as an Integral Part of the Process

The Permittee has submitted the following information to justify why the dust collectors for controlling emissions from the pneumatic transfer of spent pot liner to silos and to the kilns should be considered an integral part of the process:

- (a) The process cannot operate without the control equipment. The proposed spent pot liner transfer system uses air to fluidize and "blow" spent pot liner from one location to another. The dust collector and bin vent filter are an integral part of the pneumatic conveying system to prevent the release of the conveyed product with the venting of the air used to convey it.
- (b) The dust collector and bin vent filter recover valuable kiln fuel which would otherwise be lost to the environment. Please see the economic analysis for operation of the dust collector and bin vent filter in the tables below.
- (c) The use of the filters is necessary to contain the material, which is considered a hazardous waste. Were this material spilled into the environment, the company would have to spend additional money to clean it up.

Economic Benefit for Spent Pot Liner Truck Unloading/Silo Loading:

	Amount	Units
Spent Pot Liner Throughput	35,040	tons/year
Filter Recovery Efficiency ¹	0.03 %	%
Spent Pot Liner Recovered	11.3	tons/year
Replacement Cost of Spent Pot Liner ²	\$ 17.39	per ton
Expense With No Dust Collector	\$ 195.82	per year
Annualized Cost of Dust Collector	\$ 2,000.00	per year
Economic Benefit of Dust Collector System	\$ (1,804.18)	per year

¹ The source estimates that less than 0.03% of the material would be lost or wasted without the use of the integral dust collector.

² The source would burn coal if spent pot liner were unavailable. On an equivalent BTU basis, replacing spent pot liner with coal would cost \$17.39 per ton of spent pot liner.

Economic Benefit for Spent Pot Liner Kiln Loading:

	Amount	Units
Spent Pot Liner Throughput	35,040	tons/year
Filter Recovery Efficiency ¹	0.07 %	%
Spent Pot Liner Recovered	9.39	tons/year
Replacement Cost of Spent Pot Liner ²	\$ 17.39	per ton
Expense With No Filter	\$ 163.18	per year
Annualized Cost of Filter	\$ 1,000.00	per year
Economic Benefit of Filter System	\$ (836.82)	per year

¹ The source estimates that less than 0.05% of material would be lost or wasted without the use of the integral bin vent filter.

² The source would burn coal if spent pot liner were unavailable. On an equivalent BTU basis, replacing spent pot liner with coal would cost \$17.39 per ton of spent pot liner.

IDEM, OAQ has evaluated the information submitted and has determined that the dust collectors should not be considered an integral part of the pneumatic material transfer processes. This determination is based on the following:

- (a) Pneumatic conveyance systems do require containment of the conveyed material for proper operation. However, this alone does not guarantee that the system is properly operated and maintained to prevent leaks.
- (b) Avoidance of the loss of material with small monetary value is not believed to be sufficient motivation to ensure proper operation and maintenance of the dust collector and bin vent filter.
- (b) Avoidance of the cost of cleanup is not income and does not provide financial motivation to ensure that no hazardous waste escapes from any of the conveyance systems. Avoiding possible cleanup of a wind-dispersed material with small monetary value is also not believed to be sufficient motivation to ensure proper operation and maintenance of the dust collector and bin vent filter.

Therefore, the permitting level will be determined using the potential to emit before the dust collector and bin vent filter.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Lone Star Industries on September 25, 2007, relating to the addition of pneumatic conveyors and storage silos for an alternate fuel source. The following is a list of the proposed emission units and air pollution control devices:

- (a) One (1) truck and railcar unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.
- (b) One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 5).

Permit Level Determination – Part 70

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

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

Pollutant	Potential To Emit (tons/year)
PM	21.3
PM10	20.8
SO ₂	0
VOC	0
CO	0
NO _x	0
Single HAP (cyanide)	0.04
Total HAPs	0.04

This source modification is subject to 326 IAC 2-7-10.5(d)(3) because the this modification has a potential to emit of PM and PM10 equal to or greater than 5 tons per year and less than 25 tons per year. Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d) because it involves a case by case determination of a emission limitation in the Part 70 permit.

Permit Level Determination – PSD or Emission Offset

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

Process/Emission Unit	PM	PM10	SO ₂	VOC	CO	NO _x
Paved Road	0.61	0.12	0	0	0	0
Truck Unloading / Silo Loading	11.3	Less than 7.0	0	0	0	0
Pneumatic Kiln Loading	9.4	Less than 7.0	0	0	0	0
Total for Modification	21.3	14.1	0	0	0	0
PSD Significant Levels	25	15	40	40	100	40

This source is considered a major PSD source. The unrestricted potential to emit of PM10 of the emission units in this source modification is greater than 15 tons per year. Therefore, this source has elected to limit the potential to emit of PM10 of this modification as follows:

- (a) The throughput of spent pot liner shall be less than 35,040 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM10 emissions from the truck and railcar unloading operation (240F) shall not exceed 0.4 pounds per ton of material unloaded and transferred to the silo.
- (c) The PM10 emissions from the enclosed pneumatic conveyance system (241F) shall not exceed 0.4 pounds per ton of material transferred to the kiln.

Compliance with these limits will ensure that the emissions increase from this modification is less than fifteen (15) tons of PM10 per year and therefore will render the requirements of 326 IAC 2-2 (PSD) not applicable.

Based on the calculations (see Appendix A), the source will be able to comply with this limit.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) The requirements of the New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants (40 CFR 60.670-676, Subpart OOO) are not included in this modification for the unloading operation, silo, and pneumatic transfer operations because these facilities are not affected facilities subject to this subpart, as specified in 40 CFR 60.670.
- (b) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in this modification.
- (c) The unloading operation, silo, and pneumatic transfer operations are subject to the requirements of the National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry (40 CFR 63, Subpart LLL and 326 IAC 20-27) because, pursuant to 40 CFR 63.1340(b)(7), these operations are conveying systems used to transfer fuel to the kiln, and this portland cement plant is a major source.

Pursuant to 40 CFR 63.1340, the affected sources include each conveying system transfer point and bulk loading or unloading system. Therefore, the transfer points of the unloading operation, silo, and pneumatic transfer operations in this modification are subject to 40 CFR 63, Subpart LLL and shall not cause to be discharged any gases from these affected sources which exhibit opacity in excess of ten (10) percent, pursuant to 40 CFR 63.1348.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors (40 CFR 63, Subpart EEE) are not included in this modification for the unloading operation, silo, and pneumatic transfer operations because these facilities are not affected facilities subject to this subpart, as specified in 40 CFR 63.1200. However, the cement kiln burning hazardous waste is subject to the requirements of 40 CFR 63, Subpart EEE. These requirements are already included in the permit in Section D.4.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR 61, 63) included in this modification.
- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or

modified emission units that involve a pollutant-specific emission unit and meet the following criteria:

- (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
- (2) is subject to an emission limitation or standard for that pollutant; and
- (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)
Truck Unloading / Silo Loading	Dust Collector	Y	11.3	0.11	100	N
Pneumatic Transfer	Bin Vent Filer	Y	9.4	0.09	100	N

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the new units as part of this modification.

State Rule Applicability Determination

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

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

The operation of the unloading operation, silo, and pneumatic transfer operations will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-4 (Fugitive Dust Emissions)

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

326 IAC 6-5 (Fugitive Particulate Emissions Limitations)

Although constructed after December 13, 1985, the provisions of 326 IAC 6-5 do not apply to this modification because the fugitive emissions from this modification are less than 5 tons per year.

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

Pursuant to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the unloading operation, silo, and pneumatic transfer operations shall not exceed the emission limits specified in the table below:

Unit Description	Max. Process Weight Rate (tons/hr)	Allowable Particulate Emission Rate (lbs/hr)
Truck Unloading / Silo Loading	33	40.9
Pneumatic Transfer	4	10.4

The allowable particulate emission rates were calculated using the equation below:

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

The dust collector and bin vent filter for the unloading and pneumatic transfer operations shall be in operation and control emissions from the facilities at all times when the facilities are in operation.

According to the emissions calculations (see Appendix A, pages 2 and 3), the uncontrolled potential to emit PM from the unloading operation and pneumatic transfer operations is less than the above limit. Therefore, the proposed unloading operation and pneumatic transfer operations will be able to comply with 326 IAC 6-3-2.

Compliance Determination and Monitoring Requirements

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

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

The Compliance Monitoring Requirements applicable to this modification are as follows:

Daily visible emission notations of the dust collector (240L) and bin vent filter (241L) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary because the dust collector and bin vent filter must operate properly to ensure compliance with 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) and 326 IAC 2-7 (Part 70)).

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T133-6927-00002. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

1. Sections A.2 and D.2 of the permit have been revised to add the requirements for the unloading operation, silo, and pneumatic transfer operations as follows:

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

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

- ...
- (o) **One (1) truck and railcar unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.**
 - (p) **One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.**

SECTION D.2 FACILITY OPERATION CONDITIONS - GYPSUM MATERIAL HANDLING PROCESS, RAW MATERIAL BALL MILL OPERATION, FLY ASH STORAGE ACTIVITIES

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

...

- (o) **One (1) truck and railcar unloading operation, identified as 240F, approved for construction in 2007, for unloading and pneumatically conveying alternative fuel (spent pot liner) to a silo, with a maximum throughput capacity of 33 tons per hour, with a maximum storage capacity of 700 tons, with particulate emissions controlled by a dust collector (identified as 240L), and exhausting to stack 240L. This is an affected facility under 40 CFR 63, Subpart LLL.**
- (p) **One (1) enclosed pneumatic conveyance system, identified as 241F, approved for construction in 2007, for pneumatically conveying alternative fuel (spent pot liner) from the silo to the cement kiln, with a maximum throughput capacity of 4 tons per hour, with particulate emissions controlled by a bin vent filter (identified as 241L), and exhausting to stack 241L. This is an affected facility under 40 CFR 63, Subpart LLL.**

D.2.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply, except when otherwise specified in 40 CFR 63, Subpart LLL, to the gypsum material handling process, raw material ball mill operations, and fly ash storage activities, **truck unloading, and pneumatic transfer activities** listed in Condition D.2.2.

D.2.2 Particulate Matter Emission Limitation [326 IAC 20] [40 CFR 63, Subpart LLL]

Pursuant to 40 CFR 63, Subpart LLL (NESHAP for the Portland Cement Manufacturing Industry), the following emission units are subject to 40 CFR 63, Subpart LLL, and the visible emissions from these units shall be less than 10 percent opacity:

Operations	Units	Emission Point
Synthetic Gypsum Material Handling Process	one (1) synthetic gypsum hopper (230F) one (1) conveyor belt (230FV) one (1) weigh belt (230V) one (1) conveyor belt (232V)	1-34
	one (1) granulated slag/rock hopper (231F) one (1) conveyor belt (231FV) one (1) weigh belt (231V)	1-35
	one (1) enclosed pug mill (232L) one (1) CKD bin (232F) one (1) discharge screw (232FV)	S1-36 (232FL)
	two (2) belt conveyors (233V, 233V1)	1-41
	one (1) finished gypsum material hopper (234F) two (2) conveyor belts (234V, 234FV)	1-38
Raw Material Ball Mill Operations	four (4) belt conveyors (252V-255V) four (4) raw material bins (350F-353F)	FF 1-17 (350L)
	four (4) weigh feeders (350V-353V) one (1) conveyor belt (358V) two (2) apron feeders (350V1, 351V1) two (2) scavenger conveyors (350V2, 351V2)	1-18
	one (1) alleviator	FF 1-7 (351L)
Fly Ash Storage Activities	two (2) screw conveyors (273V, 274V) two (2) fly ash hoppers (273F, 273FA)	FF 1-20 (274L)
	one (1) fly ash silo (270F)	FF 1-39 (270L)
	one (1) fly ash silo (271F)	FF 1-40 (271L)
	two (2) additive silos (318F, 328F) four (4) rotary feeders (318V, 318VV, 328V, 328VV)	FF 1-21 (319L)
	one (1) additive feed bin (308F)	BE 1-22
	two (2) rotary feeders (308V, 308VV) one (1) weigh belt (309V)	BE 1-23
Truck Unloading / Silo Loading	one (1) truck unloading, pneumatic conveying and silo (240F)	240L
Pneumatic Transfer	one (1) pneumatic transfer (241F)	241L

D.2.3 Particulate Matter Emission Limitation [326 IAC 2-2]

...

- (f) In order to render PSD not applicable to the modification permitted in MSM 133-25345-00002, the Permittee shall limit emissions as follows:**
- (1) The throughput of spent pot liner shall be less than 35,040 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.**
 - (2) The PM10 emissions from the truck and railcar unloading operation (240F) shall be limited to less than 0.4 pounds per ton of material unloaded and transferred to the silo.**
 - (3) The PM10 emissions from the enclosed pneumatic conveyance system (241F) shall be limited to less than 0.4 pounds per ton of material transferred to the kiln.**

D.2.5 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following facilities shall be limited as follows when operating at the listed process weight rate:

Operations	Process Weight Rate (ton/hr) (P)	Allowable Emissions For All Units Combined (lbs/hour) (E)
Gypsum Material Handling Process	150	55.4
Raw Material Ball Mill Operations, excluding the units venting through baghouse 350L and 351L	400	66.3
Fly Ash Storage Activities, excluding the units venting through baghouse 270L, 271L, and 274L	30	40.0
Truck Unloading / Silo Loading	33	40.9
Pneumatic Transfer	4	10.4

NOTE: Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emission may exceed that shown in this table, provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

The limitations for these facilities were calculated using the following equations:

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:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

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

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.7 Particulate Matter (PM)

- (a) In order to comply with Conditions D.2.2, D.2.3, and D.2.5, the baghouses for PM/PM10 control associated with the gypsum material handling process, the raw material ball mill operation, ~~and the fly ash storage activities~~ **and the dust collector and bin vent filter for the truck unloading and pneumatic transfer operations** stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

D.2.10 Visible Emissions Notations

- (a) Visible emission notations of each baghouse associated with the synthetic gypsum material handling process (232FL), raw material ball mill operation (350L, 351L), ~~and the fly ash storage activities (274L, 270L, 271L, and 319L),~~ **and the truck unloading and pneumatic transfer operations (240L and 241L)** stack exhausts shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

...

D.2.13 Record Keeping Requirements

...

- (b) To document compliance with Condition D.2.10, the Permittee shall maintain records of once per day visible emission notations of the synthetic gypsum material handling process, raw material ball mill operation, and fly ash storage activities, **truck unloading operations, and pneumatic transfer operations** stack exhausts. 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).

...

- (e) **To document compliance with Condition D.2.3(f)(1), the Permittee shall maintain records of the throughput amount, in tons, of spent pot liner through the truck unloading operations.**

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

D.2.14 Reporting Requirements

...

- (d) **A quarterly summary of the information to document compliance with Condition D.2.3(f)(1) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "Responsible Official" as defined by 326 IAC 2-7-1(34).**

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

Part 70 Quarterly Report

Source Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
Source Address: 3301 South County Rd 150 West, Greencastle, Indiana 46135
Mailing Address: P.O. Box 486, Greencastle, Indiana 46135
Part 70 Permit No.: T133-6927-00002
Facility: Truck Unloading, Pneumatic Conveyance, Silo Loading, Kiln Loading
Parameter: Pot Liner Throughput
Limit: The throughput shall not exceed 35,040 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 133-25345-00002 and Significant Permit Modification No.: 133-25460-00002. The staff recommend to the Commissioner that this Part 70 Minor Source Modification and Significant Permit Modification be approved.

**Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads**

Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Address: 3301 South County Road 150 West, Greencastle, IN 46135
 SPM to TV: 133-25460-00002
 Reviewer: ERG/ST
 Date: November 6, 2007

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (11/06), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$$

where:

E = emission factor (lb/vehicle mile traveled)
 sL = road surface silt loading (g/m²) = 0.6 (g/m²) (AP-42, Table 13.2.1-3)
 w = mean vehicle weight (tons) = 27.5 tons
 k = empirical constant = 0.082 for PM and 0.016 for PM10
 a = empirical constant = 0.65
 b = empirical constant = 1.5
 C = emission factor for exhaust, brake and tire wear 0.00047 for PM and PM10
 p = number of days per year with 0.01 inches precipitation 120

PM Emission Factor = $(0.082 \times (0.6/2)^{0.65} \times (27.5/3)^{1.5} - 0.00047) \times (1 - 120/1460) = 0.95$ lbs/mile

PM10 Emission Factor = $(0.016 \times (0.6/2)^{0.65} \times (27.5/3)^{1.5} - 0.00047) \times (1 - 120/1460) = 0.19$ lbs/mile

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

Vehicle Type	*Ave Weight of Vehicles	*Trip Number	* Round Trip Distance	Vehicle Miles Traveled (VMT)	Traffic Component	Component Vehicle Weight	PTE of PM Before Control	PTE of PM10 Before Control
	(tons)	(trips/hr)	(mile/trip)	(miles/yr)	(%)	(tons)	(tons/yr)	(tons/yr)
Trucks - Alternative Fuel	27.5	0.15	1.00	1,270	100%	27.50	0.61	0.12
Total				1,270	100%	27.5	0.61	0.12

* This information is provided by the source.

Methodology

Vehicle Miles Traveled (miles/yr) = Trip Number (trips/hr) x Round Trip Distance (miles/trip) x 8760 hrs/yr

Traffic Component (%) = VMT (Trucks - Altrnative Fuel)/ Total VMT

Component Vehicle Weight = Ave. Weight of Vehicles (tons) x Traffic Component (%)

PTE of PM/PM10 before Control (tons/yr) = VMT (miles/yr) x PM/PM10 Emission Factors (lbs/mile) x 1 ton/2000 lbs

Appendix A: Emission Calculations
Particulate Emissions from Pneumatic Transfer of Alternative Fuel From Trucks to Silo

Lone Star Industries, Inc. dba Buzzi Unicem USA
 Address: 3301 South County Road 150 West, Greencastle, IN 46135
 SPM to TV: 133-25460-00002
 Reviewer: ERG/ST
 Date: November 6, 2007

Maximum Throughput Rate (tons/hr) 33	Maximum Yearly Throughput Rate (tons/yr) * 35,040	Hours of Operation (hr/yr) ** 1,051
---	--	--

Process	Maximum Air Flow Rate (scfm)	Grain Loading (g/dscf)	Control Efficiency (%)	PTE PM/PM10 After Controls (lbs/hr)	PTE PM/PM10 After Controls (tons/yr)	PTE PM/PM10 Before Controls (lbs/hr)	PTE PM/PM10 Before Controls (tons/yr)	326 IAC 6-3-2 Emission Limit (lbs/hr)
Pneumatic Transfer to Silo	2500	0.01	99.0%	0.21	0.11	21.4	11.3	40.9

Assume all PM equals PM10.

* Although the maximum throughput rate is 33 tons per hour at the unloading facilities, yearly throughput is bottlenecked by the capacity of the kiln, which can burn only 4 tons of the alternative fuel (spent pot liner) per hour.

** The alternative fuel (spent pot liner) arrives in the form of small chunks and clinker. It is pneumatically transferred from trucks to the silo. The source estimates that a 25 ton truckload can be unloaded into the silo in 0.75 hours. Maximum yearly usage of the alternative fuel is bottlenecked by the capacity of the kiln (4 tons per hour). Therefore, the pneumatic transfer system can only operate a maximum of 1,051 hours per year. A small dust collector controls particulate emissions.

Methodology

PTE PM/PM10 After Controls (lbs/hr) = Max Air Flow Rate (scfm) x Grain Loading (g/dscf) x 60 min/hr x 1 lb/7,000 g

PTE PM/PM10 After Controls (tons/yr) = Max Air Flow Rate (scfm) x Grain Loading (g/dscf) x 60 min/hr x 1 lb/7,000 g x 1,051 hr/yr x 1 ton/ 2,000 lb

PTE PM/PM10 Before Controls (lbs/hr) = PTE PM/PM10 After Controls (lbs/hr) / (1 - Control Efficiency %)

PTE PM/PM10 Before Controls (tons/yr) = PTE PM/PM10 After Controls (tons/yr) / (1 - Control Efficiency %)

326 IAC 6-3-2 Emission Limit (lbs/hr) = $E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and
 P = process weight rate in tons per hour

Appendix A: Emission Calculations
Particulate Emissions from Pneumatic Transfer of Alternative Fuel from Silo to Kiln

Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Address: 3301 South County Road 150 West, Greencastle, IN 46135
 SPM to TV: 133-25460-00002
 Reviewer: ERG/ST
 Date: November 6, 2007

Maximum Throughput Rate (tons/hr)	Hours of Operation (hr/yr) *
4	8,760

Process	Maximum Air Flow Rate (scfm)	Grain Loading (g/dscf)	Control Efficiency (%)	PTE PM/PM10 After Controls (lbs/hr)	PTE PM/PM10 After Controls (tons/yr)	PTE PM/PM10 Before Controls (lbs/hr)	PTE PM/PM10 Before Controls (tons/yr)	326 IAC 6-3-2 Emission Limit (lbs/hr)
Pneumatic Transfer to Kiln	250	0.01	99.0%	0.02	0.09	2.14	9.39	10.4

* The cement kiln operates continuously.

Methodology

$PTE\ PM/PM10\ After\ Controls\ (lbs/hr) = Max\ Air\ Flow\ Rate\ (scfm) \times Grain\ Loading\ (g/dscf) \times 60\ min/hr \times 1\ lb/7,000\ g$
 $PTE\ PM/PM10\ After\ Controls\ (tons/yr) = Max\ Air\ Flow\ Rate\ (scfm) \times Grain\ Loading\ (g/dscf) \times 60\ min/hr \times 1\ lb/7,000\ g \times 8,760\ hr/yr \times 1\ ton/ 2,000\ lb$
 $PTE\ PM/PM10\ Before\ Controls\ (lbs/hr) = PTE\ PM/PM10\ After\ Controls\ (lbs/hr) / (1 - Control\ Efficiency\ \%)$
 $PTE\ PM/PM10\ Before\ Controls\ (tons/yr) = PTE\ PM/PM10\ After\ Controls\ (tons/yr) / (1 - Control\ Efficiency\ \%)$
 $326\ IAC\ 6-3-2\ Emission\ Limit\ (lbs/hr) = E = 4.1 \times P^{0.67}$

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

**Appendix A: Emission Calculations
HAPs Emissions**

Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Address: 3301 South County Road 150 West, Greencastle, IN 46135
 SPM to TV: 133-25460-00002
 Reviewer: ERG/ST
 Date: November 6, 2007

The alternative fuel (spent pot liner) is 0.2 % cyanide salts by weight

Process	Weight % Cyanide	PTE PM/PM10 Before Controls * (tons/yr)	PTE HAPs Before Controls (tons/yr)	PTE PM/PM10 After Controls * (tons/yr)	PTE HAPs After Controls (tons/yr)
Pneumatic Transfer to Silo	0.20%	11.3	0.02	0.11	0.0002
Pneumatic Transfer to Kiln	0.20%	9.39	0.019	0.09	0.0002
Totals			0.041		0.0004

* PTE PM/PM10 Before Controls (tons/yr) and PTE PM/PM10 After Controls (tons/yr) are from pages 2 and 3.

Methodology

PTE HAPs After Controls (tons/yr) = PTE PM/PM10 After Controls (tons/yr) x Weight % HAP

PTE HAPs Before Controls (tons/yr) = PTE PM/PM10 Before Controls (tons/yr) x Weight % HAP

**Appendix A: Emission Calculations
Summary**

Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA
 Address: 3301 South County Road 150 West, Greencastle, IN 46135
 SPM to TV: 133-25460-00002
 Reviewer: ERG/ST
 Date: November 6, 2007

Emission Units	Potential to Emit (tons/year)									
	Before Controls			After Controls			SO ₂	NO _x	VOC	CO
	PM	PM10	Total HAPs	PM	PM10	Total HAPs				
Paved Roads	0.61	0.12	-	0.61	0.12	-	-	-	-	-
Pneumatic Silo Loading	11.3	11.3	0.04	0.11	0.11	0.0004	-	-	-	-
Pneumatic Kiln Loading	9.39	9.39		0.09	0.09		-	-	-	-
Total	21.3	20.8	0.04	0.81	0.32	0.0004	0	0	0	0