



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: September 4, 2008

RE: Consolidated Grain and Barge / 029-26601-00036

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

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

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FNPER.dot12/03/07



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September 4, 2008

Mr. Scott Perkins
Consolidated Grain and Barge
210 George Street
Aurora, IN 47001

Re: 029-26601-00036
First Significant Revision to
F029-23499-00036

Dear Mr. Perkins:

Consolidated Grain and Barge was issued a Federally Enforceable State Operating Permit (FESOP) No. F029-23499-00036 on December 11, 2006 for a stationary metallic slag handling and processing source located at 3919 East Laughery Road, Aurora, IN 47001. On May 28, 2008, the Office of Air Quality (OAQ) received an application from the source requesting an increase in total throughput of metallic slag through the metallic slag handling and processing operations from 15,500 tons per year to 30,000 tons per year. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-8-11.1, these changes to the permit are required to be reviewed in accordance with the Significant Permit Revision (SPR) procedures of 326 IAC 2-8-11.1(f). Pursuant to the provisions of 326 IAC 2-8-11.1, a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jason R. Krawczyk, of my staff, at 317-234-5175 or 1-800-451-6027, and ask for extension4-5175.

Sincerely,

Original signed by

Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document and revised permit

IC/JRK

cc: File - Dearborn County
Dearborn County Health Department
U.S. EPA, Region V
Air Compliance Section
Compliance Data Section
Technical Support and Modeling
Permits Administrative and Development

Consolidated Grain and Barge
Aurora, Indiana
Permit Reviewer: Jason R. Krawczyk

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FESOP SPR No. 029-26601-00036

Billing, Licensing and Training Section



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Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

**Consolidated Grain and Barge Company
3919 East Laughery Creek Road
Aurora, Indiana 47001**

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

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

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

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

Operation Permit No.: F 029-23499-00036	
Issued by: Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: December 11, 2006 Expiration Date: December 11, 2011

First Significant Permit Modification.: F 029-26601-00036	
Issued by: Original signed by Iryn Calilung, Section Chief Permits Branch Office of Air Quality	Issuance Date: September 4, 2008 Expiration Date: December 11, 2011

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SECTION A

SOURCE SUMMARY

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

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

The Permittee owns and operates a metallic slag handling and processing source.

Source Address:	3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address:	210 George Street, Aurora, Indiana 47001
General Source Phone Number:	812 - 926 - 0740
SIC Codes:	3255 and 3295
County Location:	Dearborn, outside of Lawrencburg Township
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act

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

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

- (a) Four (4) transfer points, identified as T-1 through T-4, constructed in 2006, capacity: 90 tons of metallic slag per hour, each.
- (b) Two (2) fines transfer points, identified as F-1 and F-2, constructed in 2006, capacity: 18 tons of metallic slag per hour, each.
- (c) Two (2) oversize transfer points, identified as OV-1 and OV-2, constructed in 2006, capacity: 1.8 tons of metallic slag per hour, each.
- (d) Two (2) normal sized transfer points, identified as NO-1 and NO-2, constructed in 2006, capacity: 70.2 tons of metallic slag per hour, each.
- (e) One (1) portable electric primary crusher, identified as CR-1, constructed in 2006, capacity: 90 tons of metallic slag per hour.
- (f) One (1) screening operation, identified as SC-1, constructed in 2006, capacity: 90 tons of metallic slag per hour.

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

This stationary source also includes the following insignificant activities:

- (g) One (1) diesel storage tank, with a maximum capacity of 500 gallons, constructed in 2006.

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, 029-23499-00036, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

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

B.9 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]

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

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted 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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall 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 an "authorized individual"as defined by 326 IAC 2-1.1-1(1).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual"as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, 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 2-8-4(3)(C)(ii) and must contain the following:

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

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

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

- (a) All terms and conditions of permits established prior to 029-23499-00036 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

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

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

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

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

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

Indianapolis, Indiana 46204-2251

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

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

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

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

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

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

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

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

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

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

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

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

- (4) The Permittee notifies the:

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

and

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

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

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

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

- (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 2-8-15(c)]
The Permittee may trade emissions increases and decreases at in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (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.20 Source Modification Requirement [326 IAC 2-8-11.1]

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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

- (a) Enter upon the Permittee's premises where a FESOPsource is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect ,at reasonable times,any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

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

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

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

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

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

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

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

B.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.25 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred and fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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 August 23, 2006. The plan consists of best management practices consisting of but not limited to:

(a) Roadway Control Areas

- (1) Limiting vehicle speed on unpaved roadways to 10 mph,
- (2) Encouraging natural vegetative growth (trees and grasses) along the property lines except in traffic or equipment lanes, and
- (3) Suppressing dust from vehicle traffic by the application of water on an as needed basis.

(b) Material Storage Areas

- (1) Storing inbound and finished products within concrete containment walls, and
- (2) Covering stored finished product.

(c) Outdoor Conveying and Transfer Points

- (1) Enclosing conveying and transfer points with tarps or casings over the conveyor belts and transfer points, where feasible,
- (2) Using best management practices to reduce dust emissions when loading trucks, such as placing the end loader bucket as low as possible into the truck, and
- (3) Utilizing best management practices for reducing dust emissions from the discharge points of conveyors including keeping the conveyor as close as feasible to the pile to reduce the fall distance. In addition, socks or wind deflectors will be used to reduce dust emissions from the conveyor spouts.

(d) Record Keeping

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

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

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

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed 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 Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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

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

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

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

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

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

- (b) The Permittee shall notify IDEM, OAQ, of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.10 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

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

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

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

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

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

C.11 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.

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

C.12 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 180 days from the date on which this source commences operation.

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

(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.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

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

- (c) IDEM, OAQ, reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

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

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

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

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

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

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

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

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

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

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

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

SECTION D.1

EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Metallic Slag Processing

- (a) Four (4) transfer points, identified as T-1 through T-4, constructed in 2006, capacity: 90 tons of metallic slag per hour, each.
- (b) Two (2) fines transfer points, identified as F-1 and F-2, constructed in 2006, capacity: 18 tons of metallic slag per hour, each.
- (c) Two (2) oversize transfer points, identified as OV-1 and OV-2, constructed in 2006, capacity: 1.8 tons of metallic slag per hour, each.
- (d) Two (2) normal sized transfer points, identified as NO-1 and NO-2, constructed in 2006, capacity: 70.2 tons of metallic slag per hour, each.
- (e) One (1) portable electric primary crusher, identified as CR-1, constructed in 2006, capacity: 90 tons of metallic slag per hour.
- (f) One (1) screening operation, identified as SC-1, constructed in 2006, capacity: 90 tons of metallic slag per hour.

Insignificant Activities:

- (g) One (1) diesel storage tank, with a maximum capacity of 500 gallons, constructed in 2006.

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

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

D.1.1 Metallic Materials Throughput Limit [326 IAC 2-2] [326 IAC 2-8-4]

The total throughput of metallic slag through the metallic slag handling and processing operations shall not exceed 30,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this throughput limit satisfies the requirements of 326 IAC 2-8-4 for PM₁₀ emissions and limits PM emissions to render the requirements of 326 IAC 2-2 not applicable. Compliance shall be demonstrated by utilizing U.S. EPA AP-42 and AIRS emission factors.

D.1.2 Particulate Matter (PM) [326 IAC 6.5-1-2(a)]

Pursuant to 326 IAC 6.5-1-2(a), PM emissions from the metallic slag handling and processing operations that are totally enclosed shall not exceed 0.03 grains per dry standard cubic foot. The metallic slag handling and processing operations which are not enclosed are subject to 326 IAC 6.5-1-2(g) which requires compliance with 326 IAC 2, 326 IAC 5-1 and 326 IAC 6-4.

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

D.1.3 Visible Emissions Notations

- (a) Visible emission notations of the metallic slag handling and processing operations 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.

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

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the total throughput of metallic slag through the metallic slag handling and processing operations on a monthly basis.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the visible emission notations of the metallic slag handling and processing operations once per day during normal daylight operations when exhausting to the atmosphere. 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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

Source Name: Consolidated Grain and Barge Company
Source Address: 3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address: 210 George Street, Aurora, Indiana 47001
FESOP No.: F 029-23499-00036

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: Consolidated Grain and Barge Company
Source Address: 3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address: 210 George Street, Aurora, Indiana 47001
FESOP No.: F 029-23499-00036

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <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**

FESOP Quarterly Report

Source Name: Consolidated Grain and Barge Company
Source Address: 3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address: 210 George Street, Aurora, Indiana 47001
FESOP No.: F 029-23499-00036
Facilities: Metallic slag handling and processing operations
Parameter: Total throughput of metallic slag materials
Limit: 30,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

YEAR: _____

Month	Metallic Slag (tons)	Metallic Slag (tons)	Metallic Slag (tons)
	This Month	Previous 11 Months	12 Month Total

- No deviation occurred in this month.
- Deviation/s occurred in this month.
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**

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

Source Name: Consolidated Grain and Barge Company
Source Address: 3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address: 210 George Street, Aurora, Indiana 47001
FESOP No.: F 029-23499 -00036

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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: _____

A certification is not required for this report.

Indiana Department of Environmental Management Office of Air Quality

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

Source Description and Location
--

Source Name:	Consolidated Grain and Barge
Source Location:	3919 Laughery Road, Aurora, IN 47001
County:	Dearborn
SIC Code:	3255/3295
Operation Permit No.:	F 029-23499-00036
Operation Permit Issuance Date:	December 11, 2006
Significant Permit Revision No.:	029-26601-00036
Permit Reviewer:	Jason R. Krawczyk

On May 28, 2008, the Office of Air Quality (OAQ) has received an application from Consolidate Grain and Barge related to a modification to an existing stationary metallic slag handling and processing source.

Source Definition

The following determination was initially made under FESOP No. 029-23499-00036, issued on December 11, 2006:

The metallic slag handling and processing plant is located approximately three (3) miles from Consolidated Grain and Barge's existing grain elevator, located at 210 George Street in Aurora. IDEM, OAQ examined whether these two (2) plants should be considered one "major source" as defined at 326 IAC 2-7-1(22). In order for the two (2) plants to be considered one major source, they must meet all three (3) of the following criteria:

- (a) the plants must be under common ownership or common control;
- (b) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for the other; and,
- (c) the plants must be located on contiguous or adjacent properties.

The two (2) plants are both owned by Consolidated Grain and Barge Company, therefore common ownership exists. The plants have different two-digit Standard Industrial Classification (SIC) Codes. The metallic slag handling and processing plant receives all its material directly from other suppliers. None of the grain from the grain elevator will be sent to the metallic slag handling and processing plant. None of the material processed by the metallic slag handling and processing plant will go to the grain elevator. The metallic slag handling and processing plant will be operated by employees who also work at the grain elevator.

The plant manager and superintendent will be the same at both locations. The amount of time the employees will work at each location will depend on the work load.

The sharing of employees between the two (2) plants is not sufficient to create a support relationship. Since the plants have different SIC Codes and there is no support relationship, the two (2) plants are not one major source. Therefore, the term "source" in the permit documents refers only to the metallic slag handling and processing plant.

Existing Approvals

The source was issued FESOP No. 029-23499-00036 on December 11, 2006. The source has since received no other approvals.

County Attainment Status

The source is located outside of Lawrenceburg Township in Dearborn County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005. Unclassifiable or attainment effective April 5, 2005, for PM _{2.5} .	

(a) Ozone Standards

- (1) 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.
- (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.
- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Dearborn 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.

(b) PM2.5

Dearborn County has been classified as attainment for PM2.5 except Lawrenceburg Township. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 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.

(c) Other Criteria Pollutants

Dearborn 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.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

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

Process/Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)							
	PM	PM10	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Metallic slag handling and processing	10.7	3.81	-	-	-	-	-	-
Unpaved Roads (Insignificant Activity)	3.93	1.20	-	-	-	-	-	-
Other Insignificant Activities	0.01	0.01	-	-	1.00	-	Negl.	Negl.
Total PTE of Entire Source	14.6	5.01	-	-	1.00	-	Negl.	Negl.
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible These emissions are based upon FESOP 029-23499-00036. Because the source is not 1 of 28 and has no applicable NSPS that was in effect on August 7, 1980, fugitive emissions are not counted toward PTE.								

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the unlimited potential to emit HAPs are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by Consolidated Grain and Barge on May 28, 2008, relating to an increase in total throughput of metallic slag through the metallic slag handling and processing operations from 15,500 tons per year to 30,000 tons per year. There are no new emission units to be constructed to accomplish this increase.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – FESOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-8.11.1. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/Emission Unit	PTE of Proposed Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Metallic slag handling and processing ^(α)	10.00	3.54	-	-	-	-	-	-
Unpaved Roads ^(β) (Insignificant Activity)	0.75	-	-	-	-	-	-	-
Other Insignificant Activities	-	-	-	-	-	-	-	-
Total PTE of Proposed Revision	10.75	3.54	-	-	-	-	-	-
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. (α) This table shows the additional emissions after controls as a result of the increase in throughput from 15,000 to 30,000 tons of metallic slag per year. (β) Changes in Unpaved Roads emissions are due to updates in AP-42 emission factors, not production changes.								

This FESOP is being revised through a FESOP Significant Permit Revision pursuant to 326 IAC 2-8-11.1(g)(2) because it involves adjustment to the existing source-wide emissions limitations to maintain the FESOP status of the source (see PTE of the Entire Source After The Issuance of the FESOP Revision Section).

PTE of the Entire Source After Issuance of the FESOP Revision

The table below summarizes the potential to emit of the entire source reflecting adjustment of existing limits, with updated emissions shown as **bold** values and previous emissions shown as ~~strikethrough~~ values.

Process/Emission Unit	Potential To Emit of the Entire Source to accommodate the Proposed Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Metallic slag handling and processing	40.70 20.70	3.84 7.35	-	-	-	-	-	-
Unpaved Roads ^(α)	3.93 4.68	1.20	-	-	-	-	-	-
Other Insignificant Activities ^(α)	0.01	0.01	-	-	1.00	-	Negl.	Negl.
Total PTE of Entire Source	40.70 20.70	3.84 7.35	-	-	-	-	Negl.	Negl.
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ^(α) Because the source is not 1 of 28 and has no applicable NSPS that was in effect on August 7, 1980, fugitive emissions are not counted toward total PTE.								

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

Process/Emission Unit	Potential To Emit of the Entire Source After Issuance of Revision (tons/year)							
	PM	PM10*	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Metallic slag handling and processing	20.70	7.35	-	-	-	-	-	-
Unpaved Roads (Insignificant Activity)	4.68	1.20	-	-	-	-	-	-
Other Insignificant Activities	0.01	0.01	-	-	1.00	-	-	-
Total PTE of Entire Source	20.70	7.35	-	-	-	-	negl.	negl.
Title V Major Source Thresholds	NA	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	NA	NA
negl. = negligible * US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ^(α) Because the source is not 1 of 28 and has no applicable NSPS that was in effect on August 7, 1980, fugitive emissions are not counted toward total PTE.								

- (a) **FESOP Status**
This revision to an existing Title V minor stationary source will not change the minor status, because the potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the

provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) the source shall comply with the following:

- (1) The total throughput of metallic slag through the metallic slag handling and processing operations shall not exceed 30,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month

Compliance with these limits, combined with the potential to emit PM and PM10 from all other emission units at this source, shall limit the source-wide total potential to emit of PM and PM10 to less than 100 tons per 12 consecutive month period, each, any single HAP to less than ten (10) tons per 12 consecutive month period, and total HAPs to less than twenty-five (25) tons per 12 consecutive month period and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 Prevention of Significant Deterioration (PSD) not applicable.

PM and PM 10 emissions shall be determined by the use of emission factors from AP-42 Chapter 11.24, Table 11.24-2 (Fifth edition) for Crushing and Transfer emissions, and the AIRS emission factor for Screening (SCC 3-05-010-12).

- (b) PSD Minor Source
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of New Source Performance Standard 326 IAC 12 and 40 CFR Part 60.670 through 60.676, Subpart OOO (Standards of Performance for Nonmetallic Mineral Processing Plants) are not included in this permit because the metallic slag that will be crushed and processed is not a non-metallic mineral as defined in this subpart.
- (b) The requirements of New Source Performance Standard 326 IAC 12 and 40 CFR Part 60.380 through 60.386, Subpart LL (Standards of Performance for Metallic Mineral Processing Plants) are not included in this permit because the proposed source is not a metallic mineral processing plant as defined in this subpart. Subpart LL defines a metallic mineral processing plant as any combination of equipment that produces metallic mineral concentrates from ore. This source will not be producing metallic mineral concentrates from ore. Therefore, this source is not a metallic mineral processing plant pursuant to NSPS Subpart LL.
- (c) There are no New Source Performance Standards (NSPS)(40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the potential to emit of the source is limited to less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The existing state rule applicability and compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in FESOP No: 029-23499-00036, issued on December 11, 2006.

Air Quality Impacts from Minor Sources

Modeling Overview

Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) criteria pollutants from this proposed source modification to estimate whether the Limited PTE criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

Modeling Results

The modeling results indicate that the Limited PTE criteria pollutants from this source modification will not exceed the National Ambient Air Quality Standards (NAAQS). See Appendix B - Air Quality Analysis for details.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

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

D.1.1 Metallic Materials Throughput Limit [326 IAC 2-2] [326 IAC 2-8-4]

The total throughput of metallic slag through the metallic slag handling and processing operations shall not exceed ~~15,500~~ **30,000** tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with this throughput limit satisfies the requirements of 326 IAC 2-8-4 for PM₁₀ emissions and limits PM emissions to render the requirements of 326 IAC 2-2 not applicable. Compliance shall be demonstrated by utilizing U.S. EPA AP-42 and AIRS emission factors.

...

- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:

- (1) IDEM, OAQ has decided to remove the information regarding the Authorized Individual from Section A.1 of the permit and designate that the source is located outside of Lawrenceburg Township. Section A.1 has been revised as follows:

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

The Permittee owns and operates a metallic slag handling and processing source.

Authorized Individual:	Facility Manager
Source Address:	3919 East Laughery Creek Road, Aurora, Indiana 47001
Mailing Address:	210 George Street, Aurora, Indiana 47001
General Source Phone Number:	812 - 926 - 0740
SIC Codes:	3255 and 3295
County Location:	Dearborn, outside of Lawrenceburg Township
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules

Minor Source, Section 112 of the Clean Air Act

...

- (2) All occurrences of IDEM mailing addresses have been revised to include a mail code (MC) as follows:

Asbestos Section:	MC 61-52 IGCN 1003
Compliance Branch:	MC 61-53 IGCN 1003
Permits Branch:	MC 61-53 IGCN 1003

- (3) IDEM, OAQ has decided to change the requirement for the owner or operator to use an Indiana Accredited Asbestos Inspector to require the owner or operator to use and Indiana Licensed Asbestos Inspector. Condition C.8(g) has been revised as follows:

...

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

...

- g) ~~Indiana Accredited~~ **Licensed** 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~~ **Licensed** Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

...

- (4) IDEM has removed all construction conditions from FESOP 029-23499-00036 because all facilities previously permitted have already been constructed; therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction. The permit has been revised as followed:

...

B.2 Revocation of Permits [326 IAC 2-1.1-9(5)]

~~Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.~~

B.3 Affidavit of Construction [326 IAC 2-5.1-3(h)] [326 IAC 2-5.1-4]

~~This document shall also become the approval to operate pursuant to 326 IAC 2-5.1-4 and 326 IAC 2-8 when prior to the start of operation, the following requirements are met:~~

- (a) ~~The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), verifying that the emission units were constructed as proposed in the application or the permit. The emission units covered in this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM if constructed as proposed.~~
- (b) ~~If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2 and an Operation Permit Validation Letter is issued.~~
- (c) ~~The Permittee shall attach the Operation Permit Validation Letter received from the Office of Air Quality (OAQ) to this permit.~~

...

~~Construction Conditions~~

General Construction Conditions

~~D.1.1 Permit No Defense~~

~~This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.~~

Effective Date of the Permit

~~D.1.2 Effective Date of the Permit [IC 13-15-5-3]~~

~~Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.~~

~~D.1.3 Modification to Construction Conditions [326 IAC 2]~~

~~All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for revisions pursuant to 326 IAC 2.~~

Operation Conditions

...

- (5) In order to clarify recordkeeping requirements specific to parametric monitoring, Condition D.1.4 was revised as follows:

...

D.1.4 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records of the total throughput of metallic slag through the metallic slag handling and processing operations on a monthly basis.
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of the visible emission notations of the metallic slag handling and processing operations once per day during normal daylight operations when exhausting to the atmosphere. **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) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

...

- (6) FESOP 029-23499-00036 incorrectly listed a gasoline fuel transfer and dispensing operation handling under A.3 Specifically Regulated Insignificant Activities. IDEM has removed the gasoline fuel transfer and dispensing operation handling from sections A.3 and D.2 and replaced it with the 500 gallon diesel storage tank that was constructed in 2006.

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

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

- (a) Four (4) transfer points, identified as T-1 through T-4, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour, each.
- (b) Two (2) fines transfer points, identified as F-1 and F-2, ~~to be~~ constructed in 2006, capacity: 18 tons of metallic slag per hour, each.
- (c) Two (2) oversize transfer points, identified as OV-1 and OV-2, ~~to be~~ constructed in 2006, capacity: 1.8 tons of metallic slag per hour, each.

- (d) Two (2) normal sized transfer points, identified as NO-1 and NO-2, ~~to be~~ constructed in 2006, capacity: 70.2 tons of metallic slag per hour, each.
- (e) One (1) portable electric primary crusher, identified as CR-1, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour.
- (f) One (1) screening operation, identified as SC-1, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour.

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

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

~~A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons [326 IAC 8-4-6].~~

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

This stationary source also includes the following insignificant activities:

- (g) One (1) diesel storage tank, with a maximum capacity of 500 gallons, constructed in 2006.**

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description: Metallic Slag Processing

- (a) Four (4) transfer points, identified as T-1 through T-4, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour, each.
- (b) Two (2) fines transfer points, identified as F-1 and F-2, ~~to be~~ constructed in 2006, capacity: 18 tons of metallic slag per hour, each.
- (c) Two (2) oversize transfer points, identified as OV-1 and OV-2, ~~to be~~ constructed in 2006, capacity: 1.8 tons of metallic slag per hour, each.
- (d) Two (2) normal sized transfer points, identified as NO-1 and NO-2, ~~to be~~ constructed in 2006, capacity: 70.2 tons of metallic slag per hour, each.
- (e) One (1) portable electric primary crusher, identified as CR-1, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour.
- (f) One (1) screening operation, identified as SC-1, ~~to be~~ constructed in 2006, capacity: 90 tons of metallic slag per hour.

Insignificant Activities:

- (g) One (1) diesel storage tank, with a maximum capacity of 500 gallons, constructed in 2006.**

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

....

SECTION D.2 FACILITY OPERATION CONDITIONS

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

~~A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons [326 IAC 8-4-6].~~

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

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

D.2.1 Volatile Organic Compound (VOC) [326 IAC 8-4-6]

- ~~(a) Pursuant to 326 IAC 8-4-6(b), the Permittee shall not allow the transfer of gasoline between any transport and any storage tank unless such tank is equipped with the following:~~
- ~~(1) A submerged fill pipe.~~
 - ~~(2) Either a pressure relief valve set to release at no less than seven-tenths (0.7) pounds per square inch or an orifice of fivetenths (0.5) inch in diameter.~~
 - ~~(3) A vapor balance system connected between the tank and the transport, operating according to manufacturer's specifications.~~
- ~~(b) If the owner or employees of the owner of a gasoline dispensing facility are not present during loading, it shall be the responsibility of the owner or the operator of the transport to make certain the vapor balance system is connected between the transport and the storage tank and is operating according to manufacturer's specifications.~~
- ~~(c) The Permittee shall not cause or allow the dispensing of motor vehicle fuel at any time unless all motor vehicle fuel dispensing operations are equipped with and utilize a certified vapor collection and control system which is properly installed and operated as follows:~~
- ~~(1) No vapor collection and control system shall be installed, used, or maintained unless the system has been certified by CARB and meets the testing requirements specified in subsection (h)(6).~~
 - ~~(2) Any vapor collection and control system utilized shall be maintained in accordance to its certified configuration and with the manufacturer's specification and maintenance schedule.~~
 - ~~(3) No elements or components of a vapor collection and control system shall be modified, removed, replaced, or otherwise rendered inoperative in a manner which prevents the system from performing in accordance with its certification and design specifications.~~
 - ~~(4) A vapor collection and control system shall not be operated with defective, malfunctioning, missing, or noncertified components. The following requirements apply to a vapor collection and control system:~~

- ~~(A) All parts of the system which can be visually inspected must be checked daily by the operator of the facility for the following malfunctions:~~
 - ~~(i) Absence or disconnection of any component required to be used to certify the system.~~
 - ~~(ii) A vapor hose which is crimped or flattened such that the vapor passage is blocked or severely restricted.~~
 - ~~(iii) A nozzle boot which is torn in either of the following manners:
 - ~~(AA) A triangular shaped or similar tear one-half ($\frac{1}{2}$) inch or more to a side or a hole one-half ($\frac{1}{2}$) inch or more in diameter or length.~~
 - ~~(BB) Slit one (1) inch or more in length.~~~~
 - ~~(iv) A faceplate or flexible cone which is damaged in the following manner:
 - ~~(AA) For balance nozzles and nozzles for aspirator and educator assist type systems, damage shall be such that the capability to achieve a seal with a fill pipe interface is affected for one-fourth ($\frac{1}{4}$) of the circumference of the faceplate (accumulated).~~
 - ~~(BB) For nozzles for vacuum assist type systems that use a flexible cone, having more than one-fourth ($\frac{1}{4}$) of the flexible cone missing.~~~~
 - ~~(v) A nozzle shutoff mechanism which malfunctions in any manner.~~
 - ~~(vi) A vacuum producing device which is inoperative.~~
- ~~(B) Any defect in the system which is discovered in clause (A) will require the immediate shutdown of the affected pumps until proper repairs are made.~~
- ~~(C) A signed daily log of the daily inspection in clause (A) shall be maintained at the facility.~~
- ~~(D) One (1) operator or employee of the gasoline dispensing facility shall be trained and instructed annually in the proper operation and maintenance of a vapor collection and control system.~~
- ~~(E) Instructions shall be posted in a conspicuous and visible place within the motor vehicle fuel dispensing area for the system in use at that station. The instructions shall clearly describe how to fuel vehicles correctly with the vapor recovery nozzles utilized at that station. The instructions shall also include a warning that repeated attempts to continue dispensing motor vehicle fuel after the system has indicated that the vehicle fuel tank is full, may result in a spillage of fuel.~~
- ~~(d) Any gasoline dispensing facility that becomes subject to the provisions of subsection (c), above at any time shall remain subject to the provisions of (c) at all times.~~

~~———— (e) ——— The Permittee shall retain copies of all records and reports adequate to clearly demonstrate the following:~~

- ~~_____ (1) That a certified vapor collection and control system has been installed and tested to verify its performance according to its specifications.~~
- ~~_____ (2) That proper maintenance has been conducted in accordance with the manufacturer's specifications and requirements.~~
- ~~_____ (3) The time period and duration of all malfunctions of the vapor collection and control system.~~
- ~~_____ (4) The motor vehicle fuel throughput of the facility for each calendar month of the previous year.~~
- ~~_____ (5) That operators and employees are trained and instructed in the proper operation and maintenance of the vapor collection and control system.~~
- ~~_____ (f) All records and reports required shall be made available to the agency upon request. All records shall be retained for a period of two (2) years.~~
- ~~_____ (g) Within forty-five (45) days after the installation of a vapor collection and control system, the Permittee shall submit to IDEM a registration form which shall be provided by the IDEM, which provides, at a minimum, the following:
 - ~~_____ (1) The name, address, and telephone number of the facility.~~
 - ~~_____ (2) The signature of the owner or operator.~~
 - ~~_____ (3) The CARB executive order number for the vapor collection and control system to be utilized.~~
 - ~~_____ (4) The number of nozzles, excluding diesel and kerosene, used for motor vehicle refueling.~~
 - ~~_____ (5) The monthly average volume of motor vehicle fuel dispensed.~~
 - ~~_____ (6) The date of completion of installation of the vapor collection and control system. Completion of installation includes the successful passing of a vapor leakage and blockage test. A vapor leakage and blockage test must, at a minimum, include the following:
 - ~~_____ (A) A pressure decay or leak test.~~
 - ~~_____ (B) A dynamic pressure drop test.~~
 - ~~_____ (C) A liquid blockage test.~~~~~~
- ~~_____ The results of these tests must be submitted with the registration form specified in this subsection.~~
- ~~_____ (h) All vapor collection and control systems shall be retested for vapor leakage and blockage, and successfully pass the test, at least every five (5) years or upon major system replacement or modification. A major system modification is considered to be replacing, repairing, or upgrading seventy-five percent (75%) or more of a vapor collection and control system of a facility.~~

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on May 28, 2008.

The operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Revision No. 029-26601-00036. The staff recommends to the Commissioner that this FESOP Significant Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jason R. Krawczyk at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5175 or toll free at 1-800-451-6027 extension 4-5175.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

**Appendix A: Emission Calculations
Crushed Stone Processing**

Company Name: Consolidated Grain and Barge Company
Address City IN Zip: 3913 East Laughery, Aurora, Indiana 47001
FESOP Number: F 029-26601-00036
Plant ID: 029-00036
Reviewer: Jason R. Krawczyk
Application Date: May 28, 2008

PM UNCONTROLLED POTENTIAL TO EMIT

Storage		** see page 3 **					0.012	tons/yr	AP-42 Ch.11.2.3 (Fourth edition, no update)	
Transporting		** see page 4 **					4.68	tons/yr	AP-42 Ch.13.2.2 (11/2006)	
Receiving	90.0	ton/hr x	0.00	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.00	tons/yr	Rec'd in large brick/slab form - no emissions
Crushing (primary) CR-1	90.0	ton/hr x	0.5	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	197	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Screening	90.0	ton/hr x	0.16	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	63.1	tons/yr	AIRS SCC 3-05-010-12
Transfer Point T-1	90.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	47.3	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-2	90.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	47.3	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-3	90.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	47.3	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-4	90.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	47.3	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Fines Transfer F-1 (20%)	18.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	9.5	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Fines Transfer F-2 (20%)	18.0	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	9.5	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Oversize Transfer OV-1 (2%)	1.8	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.9	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Oversize Transfer OV-2 (2%)	1.8	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.9	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Normal Transfer NO-1 (78%)	70.2	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	36.9	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Normal Transfer NO-2 (78%)	70.2	ton/hr x	0.12	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	36.9	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Total emissions before controls:								549	tons/yr	

Note:

Conveyor transfer and shipping SCC # 3-03-024-04 for all minerals except bauxite. No HAPs in any materials

PM10 UNCONTROLLED POTENTIAL TO EMIT

Storage		** see page 3 **					0.012	tons/yr	AP-42 Ch.11.2.3 (Fourth edition, no update)	
Transporting		** see page 4 **					1.20	tons/yr	AP-42 Ch.13.2.2 (11/2006)	
Receiving	90.0	ton/hr x	0.00	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.00	tons/yr	Rec'd in large brick/slab form - no emissions
Crushing (primary) CR-1	90.0	ton/hr x	0.05	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	20	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Screening	90.0	ton/hr x	0.08	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	31.5	tons/yr	AIRS SCC 3-05-010-12
Transfer Point T-1	90.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	23.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-2	90.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	23.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-3	90.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	23.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Transfer Point T-4	90.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	23.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Fines Transfer F-1 (20%)	18.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	4.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Fines Transfer F-2 (20%)	18.0	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	4.7	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Oversize Transfer OV-1 (2%)	1.8	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.5	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Oversize Transfer OV-2 (2%)	1.8	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	0.5	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Normal Transfer NO-1 (78%)	70.2	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	18.4	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Normal Transfer NO-2 (78%)	70.2	ton/hr x	0.06	lb/ton	/ 2000 lb/ton x	8760	hr/yr =	18.4	tons/yr	AP-42 Ch.11.24, Table 11.24-2 (Fifth edition, 3/03)
Total emissions before controls:								194	tons/yr	

Note:

Conveyor transfer and shipping SCC # 3-03-024-04 for all minerals except bauxite. No HAPs in any materials

**Appendix A: Emission Calculations
Crushed Stone Processing (Fugitive and Non-Fugitive Emissions)**

Company Name: Consolidated Grain and Barge Company
Address City IN Zip: 3913 East Laughery, Aurora, Indiana 47001
FESOP Number: F 029-26601-00036
Plant ID: 029-00036
Reviewer: Jason R. Krawczyk
Application Date: May 28, 2008

LIMITED POTENTIAL TO EMIT

	PM		PM-10	
Storage	0.01	tons/yr	0.01	tons/yr
Transporting	4.68	tons/yr	1.20	tons/yr
Receiving	0.00	tons/yr	0.00	tons/yr
Crushing (primary) CR-1	7.50	tons/yr	0.75	tons/yr
Screening	2.40	tons/yr	1.20	tons/yr
Transfer Point T-1	1.80	tons/yr	0.90	tons/yr
Transfer Point T-2	1.80	tons/yr	0.90	tons/yr
Transfer Point T-3	1.80	tons/yr	0.90	tons/yr
Transfer Point T-4	1.80	tons/yr	0.90	tons/yr
Fines Transfer F-1 (20%)	0.36	tons/yr	0.18	tons/yr
Fines Transfer F-2 (20%)	0.36	tons/yr	0.18	tons/yr
Oversize Transfer OV-1 (2%)	0.04	tons/yr	0.02	tons/yr
Oversize Transfer OV-2 (2%)	0.04	tons/yr	0.02	tons/yr
Normal Transfer NO-1 (78%)	1.40	tons/yr	0.70	tons/yr
Normal Transfer NO-2 (78%)	1.40	tons/yr	0.70	tons/yr
Total after throughput limit:	25.39	tons/yr	8.56	tons/yr

Note:
30000 TPY throughput limit

**Appendix A: Emission Calculations
Storage Piles**

Company Name: Consolidated Grain and Barge Company
Address City IN Zip: 3913 East Laughery, Aurora, Indiana 47001
FESOP Number: F 029-26601-00036
Plant ID: 029-00036
Reviewer: Jason R. Krawczyk
Application Date: May 28, 2008

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

$$= 0.58 \text{ lb/acre/day}$$

where s = 0.5 % silt content of material

p = 125 days of rain greater than or equal to 0.01 inches

f = 15 % of wind greater than or equal to 12 mph

$$E_p (\text{storage}) = E_f * sc * (40 \text{ cuft/ton}) / (2000 \text{ lb/ton}) / (43560 \text{ sqft/acre}) / (25 \text{ ft}) * (365 \text{ day/yr})$$

$$= 0.012 \text{ tons/yr}$$

where sc = 3 ,000 tons storage capacity

Note:

Assume PM = PM10

**Appendix A: Emission Calculations
Crushed Stone Processing**

Company Name: Consolidated Grain and Barge Company
Address City IN Zip: 3913 East Laughery, Aurora, Indiana 47001
FESOP Number: F 029-26601-00036
Plant ID: 029-00036
Reviewer: Jason R. Krawczyk
Application Date: May 28, 2008

1 trip/hr x	
0.1 mile/trip x	
2 (round trip) x	
8760 hr/yr =	1752 miles per year

PM-2.5	$E_f = k \cdot [(s/12)^{0.9}] \cdot [(W/3)^b]$	
	= 0.21 lb/mile	
where k =	0.15 (particle size multiplier for PM-2.5)	
s =	5 mean % silt content of unpaved roads	
b =	0.45 Constant for PM2.5, PM-10, and PM-30 or TSP	
W =	36 tons average vehicle weight	
M =	0.2 surface	
	$E = \frac{0.21 \text{ lb/mi} \times 1752 \text{ mi/yr}}{2000 \text{ lb/ton}} =$	0.18 tons/yr
Taking natural mitigation due to precipitation into consideration:		
	$E_{ext} = E \cdot [(365-p)/365] =$	0.12 tons/yr

PM-10	$E_f = k \cdot [(s/12)^{0.9}] \cdot [(W/3)^b]$	
	= 2.09 lb/mile	
where k =	1.5 (particle size multiplier for PM-10)	
s =	5 mean % silt content of unpaved roads	
b =	0.45 Constant for PM2.5, PM-10, and PM-30 or TSP	
W =	36 tons average vehicle weight	
M =	0.2 surface material moisture content, % (default is 0.2 for dry)	
	$E = \frac{2.09 \text{ lb/mi} \times 1752 \text{ mi/yr}}{2000 \text{ lb/ton}} =$	1.83 tons/yr
Taking natural mitigation due to precipitation into consideration:		
	$E_{ext} = E \cdot [(365-p)/365] =$	1.20 tons/yr

PM	$E_f = k \cdot [(s/12)^{0.7}] \cdot [(W/3)^b]$	
	= 8.12 lb/mile	
where k =	4.9 (particle size multiplier for PM-30)	
s =	5 mean % silt content of unpaved roads	
b =	0.45 Constant for PM2.5, PM-10, and PM-30 or TSP	
W =	36 tons average vehicle weight	
M =	0.2 surface material moisture content, % (default is 0.2 for dry conditions)	
	$E = \frac{8.12 \text{ lb/mi} \times 1752 \text{ mi/yr}}{2000 \text{ lb/ton}} =$	7.12 tons/yr
Taking natural mitigation due to precipitation into consideration:		
	$E_{ext} = E \cdot [(365-p)/365] =$	4.68 tons/yr

Note:

Emission Factors from AP-42, Chapter 13.2.2, Table 13.2.2-2 (11/2006).

where p = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

Appendix B - Air Quality Analysis

Company Name: Consolidated Grain & Barge, (CGB)
Address, City IN Zip: 3913 East Laughery Street, Aurora, IN 47001
FESOP Number: F029-26601-00036
Plant ID: 029-00036
Permit Reviewer: Jason R. Krawczyk
Application Date: May 28, 2008

Proposed Project

Consolidated Grain and Barge (CGB) has requested a permit for an increased rate for their slag crushing operation which will increase emissions of Particulate Matter less than 10 microns (PM₁₀)

Analysis Summary

The emissions after controls for the project are 8.56 tons per year (tpy). This modeling was conducted to alleviate concerns regarding this permit. Based on the modeling results, the proposed source will not exceed the National Ambient Air Quality Standard (NAAQS).

Section A - Pollutants Analyzed for Air Quality Impact

Proposed Project Emissions

Significant emission levels for each pollutant are defined in 326 IAC 2-2-1 and in the Code of Federal Regulations (CFR) 52.21(b) (23) (i). PM₁₀ is the pollutant that will be emitted. An air quality analysis was performed for this pollutant based from previous comments received concerning this source. Table 1 shows the emission rates modeled and compares these to emission rates in the referenced rules.

TABLE 1
PM₁₀ Emission Rates

POLLUTANT	SOURCE DESCRIPTION	POTENTIAL EMISSION RATE	SIGNIFICANT EMISSION RATE
	(tons/year)	(tons/year)	(tons/year)
PM ₁₀	Crusher	0.75	
PM ₁₀	Screen	1.20	
PM ₁₀	Transporting & Storage	1.21	
PM ₁₀	Fines Transfer	0.36	
PM ₁₀	Oversize Transfer	0.036	
PM ₁₀	Normal Transfer	1.40	
PM ₁₀	Transfer points	3.6	
Total		8.56	15

Emission rates were taken from the permit application.

Model Description

For the NAAQS analysis, the American Meteorological Society / Environmental Protection Agency Regulatory Model (AERMOD) version 07026 was used. All regulatory default options were utilized in the U.S. EPA approved model, as listed in the 40 Code of Federal Regulations Part 51, Appendix W "Guideline on Air Quality Models".

The Auer Land Use Classification Scheme was used to determine the land use in the area. The area is considered primarily rural, so that classification was used.

Meteorological Data

For AERMOD, 1988-1992 meteorological input was generated from Covington, KY National Weather Service surface data with Dayton, Ohio National Weather Service upper air data. This data was generated from Lakes Environmental AERVIEW software.

Receptor Grid

The receptor grid extended out to a 2 kilometer square around the plant. Receptors were closely spaced (100 meters) throughout the grid. Terrain was imported from USGS maps for use in AERMOD.

Background Monitors

The monitoring site selected was the nearest PM₁₀ monitor to CGB. The monitoring site is 35 miles from the facility. The average of highest second-highest monitoring values from three years were used to determine 24-hour background concentrations. Annual background concentrations were taken from the maximum annual values.

TABLE 2
Existing Monitoring Data Used For Background Concentrations *

Pollutant	Monitoring Site	Averaging Period	Concentration ug/m3
PM ₁₀	Fort Thomas, KY	24 Hour	53
PM ₁₀	Fort Thomas, KY	Annual	20

*OAQ used latest 3 full years of data.

Section B - NAAQS

NAAQS Compliance Analysis and Results

IDEM used emission inventories with all sources within Ohio and Dearborn counties. The NAAQS inventory was taken from the IDEM's web site.

NAAQS modeling for the appropriate time-averaging periods for PM₁₀ was conducted and compared to the respective NAAQS limit. OAQ modeling results are shown in Table 3. The highest 2nd-high concentration during the five years was below the NAAQS limits and further modeling was not required.

TABLE 3
NAAQS Analysis

Pollutant	Time Averaging Period	Concentration ug/m3	Background Concentration ug/m3	Total ug/m3	NAAQS Limit ug/m3	NAAQS Violation
PM ₁₀	2 nd High 24 hour	83	53	136	150	NO
PM ₁₀	Maximum Annual	9.2	20	29	50	NO

Section C - Summary of Air Quality Analysis

CGB has applied for a permit for a new source with 8.56 tons per year (tpy) of PM₁₀ emissions. NAAQS modeling using AERMOD showed no violations of the PM₁₀ standards.

If you have any questions on the modeling analysis, please contact Steven Sherman, of the OAQ Modeling Branch at the address below. Please refer to permit number 029-26601-00036 in all correspondence.

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