



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: October 22, 2009

RE: Rockport River Terminals, Inc. / 147-28155-00054

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



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

Minor Source Operating Permit Renewal OFFICE OF AIR QUALITY

Rockport River Terminals, Inc.
2932 East State Road 66
Rockport, Indiana 47635

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

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 MSOP under 326 IAC 2-6.1.

Operation Permit No.: M147-28155-00054	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 22, 2009 Expiration Date: October 22, 2019

TABLE OF CONTENTS

A. SOURCE SUMMARY.....	4
A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]	
A.2 Emission Units and Pollution Control Equipment Summary	
B. GENERAL CONDITIONS	6
B.1 Definitions [326 IAC 2-1.1-1]	
B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]	
B.3 Term of Conditions [326 IAC 2-1.1-9.5]	
B.4 Enforceability	
B.5 Severability	
B.6 Property Rights or Exclusive Privilege	
B.7 Duty to Provide Information	
B.8 Certification	
B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]	
B.10 Preventive Maintenance Plan [326 IAC 1-6-3]	
B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]	
B.13 Permit Renewal [326 IAC 2-6.1-7]	
B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]	
B.15 Source Modification Requirement	
B.16 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC 13-17-3-2][IC 13-30-3-1]	
B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]	
B.18 Annual Fee Payment [326 IAC 2-1.1-7]	
B.19 Credible Evidence [326 IAC 1-1-6]	
C. SOURCE OPERATION CONDITIONS.....	11
Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]	
C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2 Permit Revocation [326 IAC 2-1.1-9]	
C.3 Opacity [326 IAC 5-1]	
C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.6 Fugitive Dust Emissions [326 IAC 6-4]	
C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
Testing Requirements [326 IAC 2-6.1-5(a)(2)]	
C.9 Performance Testing [326 IAC 3-6]	
Compliance Requirements [326 IAC 2-1.1-11]	
C.10 Compliance Requirements [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]	
C.11 Compliance Monitoring [326 IAC 2-1.1-11]	
C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]	
C.13 Instrument Specifications [326 IAC 2-1.1-11]	
Corrective Actions and Response Steps	
C.14 Response to Excursions or Exceedances	

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

- C.16 Malfunctions Report [326 IAC 1-6-2]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2]
[IC 13-14-1-13]

Certification	17
Annual Notification	18
Malfunction Report	19

Attachment A: Fugitive Particulate Matter Emission Control Plan

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 and A.2 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 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary river terminal for the storage, loading, and transporting of coal, coal by-products, and fertilizer.

Source Address:	2932 East State Road 66, Rockport, Indiana 47635
Mailing Address:	2932 East State Road 66, Rockport, IN 47635
General Source Phone Number:	(812) 649-8980
SIC Code:	4491
County Location:	Spencer
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Two (2) coal and coal by-products storage piles, each with storage capacities of 30,000 tons, and maximum throughputs of 600,000 tons and 300,000 tons per year respectively.
- (b) One (1) fertilizer storage pile, with maximum throughput of 60,000 tons per year.
- (c) Coal, coal by-products, and fertilizer loading, transporting, and unloading facilities constructed in 2002, with a maximum throughput of 960,000 tons per year, including the following:
 - 1. One (1) truck to conveyor transfer, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 2. Five (5) belt conveyors, constructed in 2002, with a maximum capacity of 750 tons per hour each.
 - 3. Three (3) conveyor to conveyor transfers, constructed in 2002, with a maximum capacity of 750 tons per hour each.
 - 4. One (1) barge loading operation, transporting and conveying, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 5. One (1) barge unloading to conveyer transfer, using one (1) bucket excavator, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 6. One (1) storage pile to truck transfer, using one (1) endloader, constructed in 2002, with a maximum capacity of 500 tons per hour.

7. One (1) storage pile to hopper transfer, using one (1) endloader, constructed in 2002, with a maximum capacity of 500 tons per hour.
8. One thousand (1000) feet of unpaved haul road, constructed in 2002.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

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 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M147-28155-00054, is issued for a fixed term of ten (10) 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

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

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

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

B.7 Duty to Provide Information

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

B.8 Certification

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

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification 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.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M147-28155-00054 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.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least one hundred twenty (120) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (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 2-6.1-7. Such information shall be included in the application for each emission unit at this source. 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
Permit Administration and Support Section, 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 one hundred twenty (120) days 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 2-6.1 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.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, 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 shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

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

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

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

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

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

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

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

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

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 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
Permit Administration and Support Section, 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 notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees due within thirty (30) calendar days of receipt of a bill from IDEM, OAQ.
- (b) 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.19 Credible Evidence [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 2-6.1-5(a)(1)]

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

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

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 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.4 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.5 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.6 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.7 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 attached plan as in Attachment A.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

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

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

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

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11]

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

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

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

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

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

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

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (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 or ninety (90) days of initial start-up, whichever is later.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) 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.

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

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: Rockport River Terminals, Inc.
Source Address: 2932 East State Road 66, Rockport, Indiana 47635
Mailing Address: 2932 East State Road 66, Rockport, IN 47635
MSOP No.: M147-28155-00054

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 AND ENFORCEMENT BRANCH**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	Rockport River Terminals, Inc.
Address:	2932 East State Road 66
City:	Rockport, Indiana 47635
Phone #:	(812) 649-8980
MSOP #:	M147-28155-00054

I hereby certify that Rockport River Terminals, Inc. is :

still in operation.

no longer in operation.

I hereby certify that Rockport River Terminals, Inc. is :

in compliance with the requirements of MSOP M147-28155-00054.

not in compliance with the requirements of MSOP M147-28155-00054.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER: (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100 TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF "MALFUNCTION" AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Attachment A:

Fugitive Particulate Matter Emission Control Plan

**Rockport River Terminals, Inc.
2932 East State Road 66
Rockport, Indiana 47635**

Permit No. M147-28155-00054



Rockport River Terminals Inc.
2932 East State Rd 66 ~ Rockport, IN. 47635 ~ USA
Phone/Fax 812-648-8980 ~ Email dekovendock@yahoo.net

**FUGITIVE PARTICULATE MATTER
EMMISSION CONTROL PLAN**

for

Rockport River Terminals, Inc.
Rockport, IN.

Source:

Rockport River Terminals, Inc.
2932 East State Road 66
Rockport, IN 47635

Owner and Responsible Operator:

Bruce Kanipe, President
Rockport River Terminals, Inc.
P.O. Box 52
Rockport, IN 47635

Potential To Emit:

- a.) Eight conveyor transfer points
- b.) Unpaved haul road
- c.) Stockpile area
- d.) Highway truck dumping
- e.) Highway truck loading via end loader

Vehicular Activity (Est.)

120 highway trucks per day (max.)
30,720 highway truck per year (max.)
30 automobiles per day (max)
7,680 automobiles per year (max.)

Particulate Material To Be Handled:

Coal - 800,000 tons per year (max.)

Coal By-Products - 300,000 tons per year (max.)
Fertilizer - 60,000 tons per year (max.)

Aggregate Pile Equipment:

No aggregate piles will be maintained on the property.

Control Measures:

Haul road dust suppression will be via water truck on an as needed basis depending on truck usage and weather.

Conveyor transfer points will be enclosed as well as operationally feasible and equipped with water sprays when and where possible.

Stockpiles and truck transfers will be water sprayed when and where possible and needed.

Dust Suppressant Materials:

The only dust suppressant to be used will be water. Application and concentration will be adjusted on an as needed basis depending on facility usage and weather conditions.

Particulate Matter Collection Equipment:

No mechanical collection equipment will be employed at this facility.

Schedule of Compliance With the Control Plan:

All construction and operation of the provision of this plan will be performed by Rockport River Terminals, Inc. personnel. This plan will be fully integrated into the daily operations within 4 weeks of the facility start up date.

Records:

The documentation of the use of the provisions of this plan will be kept and available at the source office located at 2932 East State Road 66 in Rockport, IN.


Signature of Responsible Operator

9-26-02
Date

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

Technical Support Document (TSD) for a Minor Source Operating Permit Renewal

Source Background and Description

Source Name:	Rockport River Terminals, Inc.
Source Location:	2932 East State Road 66, Rockport, IN 47635
County:	Spencer
SIC Code:	4491
Permit Renewal No.:	M147-28155-00054
Permit Reviewer:	Jeff Scull

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application for Rockport River Terminals, Inc. relating to the operation of a river terminal for the storage, loading, and transporting of coal, coal by-products, and fertilizer.

History

On June 29, 2009, Rockport River Terminals, Inc. submitted an application to the OAQ requesting to renew its operating permit. Rockport River Terminals, Inc. was issued a MSOP, permit number M147-15954-00054, issued on November 19, 2002.

Permitted Emission Units and Pollution Control Equipment

- (a) Two (2) coal and coal by-products storage piles, each with storage capacities of 30,000 tons, and maximum throughputs of 600,000 tons and 300,000 tons per year respectively.
- (b) One (1) fertilizer storage pile, with maximum throughput of 60,000 tons per year.
- (c) Coal, coal by-products, and fertilizer loading, transporting, and unloading facilities constructed in 2002, with a maximum throughput of 960,000 tons per year, including the following:
 - 1. One (1) truck to conveyor transfer, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 2. Five (5) belt conveyors, constructed in 2002, with a maximum capacity of 750 tons per hour each.
 - 3. Three (3) conveyor to conveyor transfers, constructed in 2002, with a maximum capacity of 750 tons per hour each.
 - 4. One (1) barge loading operation, transporting and conveying, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 5. One (1) barge unloading to conveyer transfer, using one (1) bucket excavator, constructed in 2002, with a maximum capacity of 750 tons per hour.
 - 6. One (1) storage pile to truck transfer, using one (1) endloader, constructed in 2002, with a maximum capacity of 500 tons per hour.

7. One (1) storage pile to hopper transfer, using one (1) endloader, constructed in 2002, with a maximum capacity of 500 tons per hour.
8. One thousand (1000) feet of unpaved haul road, constructed in 2002.

Existing Approvals

Since the issuance of the MSOP M147-15954-00054 on November 19, 2002, the source has constructed or has been operating under the following approvals as well:

There have been no additional approvals issued to this source.

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

The following terms and conditions from previous approvals have been determined no longer applicable; therefore, were not incorporated into this MSOP Renewal:

- (a) All construction conditions from all previously issued permits.

Reason not incorporated: 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.

Enforcement Issue

IDEM is aware that the source has been operating with an expired permit. In accordance with 326 IAC 2-6.1-7(b), a timely renewal application is one that is submitted at least one hundred twenty (120) calendar days prior to the expiration date of the source's existing operating permit. Rockport River Terminals, Inc.'s initial permit (M147-15954-00054) expired on November 19, 2007. However, the source's permit renewal application was not received by IDEM until June 29, 2009. IDEM is reviewing this matter and will take appropriate action.

IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Spencer County (Hammond Township)

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. Basic nonattainment designation effective federally April 5, 2005, for the Ohio Twp for PM2.5. The remainder of Spencer County is unclassifiable or attainment effective April 5, 2005, for PM2.5.	

(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, and 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. Spencer 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) Spencer County has been classified as attainment for PM2.5. On May 8, 2008 U.S. EPA promulgated the requirements for Prevention of Significant Deterioration (PSD) for PM2.5 emissions, and the effective date of these rules was July 15, 2008. Indiana has three years from the publication of these rules to revise its PSD rules, 326 IAC 2-2, to include those requirements. The May 8, 2008 rule revisions require IDEM to regulate PM10 emissions as a surrogate for PM2.5 emissions until 326 IAC 2-2 is revised.

(c) Other Criteria Pollutants

Spencer County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 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 and Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	69.66
PM ₁₀	18.23
PM _{2.5}	17.51
SO ₂	0
VOC	0
CO	0
NO _x	0

HAPs	tons/year
Total	0

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants is less than 100 tons per year. The source is not subject to the provisions of 326 IAC 2-7. Therefore, the source will be issued an MSOP
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination of HAPs is less than twenty-five (25) tons per year.

Since this type of operation is not one of the twenty-eight (28) listed source categories under 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 Part 70 applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this MSOP 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 (tons/year)							
	PM	PM ₁₀	PM _{2.5}	SO ₂	VOC	CO	NO _x	HAPs
Storage Piles	2.11	0.74	0.23	-	-	-	-	-
Coal Storage and Handling	0.41	0.20	0.03	-	-	-	-	-
Coal by-products Storage and Handling	0.08	0.04	0.01	-	-	-	-	-
Fertilizer Storage and Handling	0.04	0.02	0.00	-	-	-	-	-
Coal Conveying	0.90	0.33	0.33	-	-	-	-	-
Coal by-products Conveying	0.45	0.17	0.17	-	-	-	-	-
Fertilizer Conveying	0.09	0.03	0.03	-	-	-	-	-
Unpaved Roads	65.58	16.71	16.71	-	-	-	-	-
Total Emissions	69.66	18.23	17.51	-	-	-	-	-

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and 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 and Emission Offset applicability.

Federal Rule Applicability

- (a) This coal storage and handling facility is not subject to the requirements of the New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.250), Subpart Y (Standards of Performance for Coal Preparation Plants, since the facility does not meet the definition of a coal preparation plant as defined in 40 CFR 60.251(a).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Spencer County and the potential to emit of each criteria pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

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

- (a) Opacity shall not exceed an average of 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.

State Rule Applicability – Individual Facilities

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

- (a) Each of the Belt Conveyers are subject to 326 IAC 6-3-2, since they each have potential particulate emissions greater than 0.551 pounds per hour. Pursuant to 326 IAC 6-3-2(e), the particulate emissions from each of the Belt Conveyers shall not exceed the 73.93 lb PM/hr.

The pounds per hour limitations were calculated with the following equations:

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

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

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

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

Emission controls are not necessary to meet the requirements of 326 IAC 6-3, since the uncontrolled potential to emit particulate matter from the Belt Conveyers are each less than the allowable emission rates under 326 IAC 6-3.

- (b) Pursuant to 326 IAC 6-3-1(b)(14) the particulate emissions from the barge loading operation, barge unloading to conveyer transfer, storage pile to hopper transfer, truck to conveyer transfer, storage pile to truck transfer, storage pile to hopper transfer, and conveyer to conveyer transfers are not subject to the requirements of 326 IAC 6-3-2 because the potential emissions are each less than five hundred fifty-one thousandths (0.551) pound per hour.

326 IAC 6-4 (Fugitive Dust Emissions Emission Limitations)

Pursuant to 326 IAC 6-4-2, the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

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

Pursuant to 326 IAC 6-5-1, any new source of fugitive particulate matter emissions, located anywhere in the state, requiring a permit as set forth in 326 IAC 2, which has not received all the necessary preconstruction approvals before December 13, 1985, are subject to 326 IAC 6-5. Therefore, the source is subject to this rule.

Pursuant to 326 IAC 6-5-3 (Submission of Control Plan), the source shall include a control plan or request for an exemption from the control plan in the permit application and submit it to the commissioner. The source has fulfilled the requirements of this rule by submitting a control plan for fugitive dust control. Fugitive particulate matter emissions shall be controlled according to the plan submitted on September 27, 2002. The plan is included in the permit as Attachment A.

Recommendation

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

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

An application for the purposes of this review was received on June 29, 2009.

Conclusion

The operation of this coal, coal by-products, and fertilizer storage, loading, and transporting facility shall be subject to the conditions of the attached MSOP Renewal No. M147-28155-00054.

Appendix A: Emission Calculations

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Pit ID: 147-00054
Reviewer: Jeff Scull
Date: 7/1/2009

Total Potential To Emit (tons/year)

Emissions Generating Activity

Pollutant	Storage Piles	Coal Handling	Coal by-products Handling	Fertilizer Handling	Coal Conveying	Coal by-products Conveying	Fertilizer Conveying	Unpaved Roads	TOTAL
PM	2.11	0.41	0.08	0.04	0.90	0.45	0.09	65.58	69.66
PM10	0.74	0.20	0.04	0.02	0.33	0.17	0.03	16.71	18.23
PM2.5	0.23	0.03	0.01	0.00	0.33	0.17	0.03	16.71	17.51
SO ₂	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HAPs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year

For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

Controlled Potential To Emit (tons/year)

Emissions Generating Activity

Pollutant	Storage Piles	Coal Handling	Coal by-products Handling	Fertilizer Handling	Coal Conveying	Coal by-products Conveying	Fertilizer Conveying	Unpaved Roads	TOTAL
PM	2.11	0.41	0.08	0.04	0.90	0.45	0.09	22.91	26.99
PM10	0.74	0.20	0.04	0.02	0.33	0.17	0.03	5.84	7.36
PM2.5	0.23	0.03	0.01	0.00	0.33	0.17	0.03	5.84	6.64
SO ₂	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
VOC	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
CO	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
HAPs	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Total emissions based on rated capacities at 8,760 hours/year with control

For the purposes of determining Title V applicability, PM10 (not PM) is the regulated pollutant in consideration

**Appendix A: Emissions Calculations
Material Storage Piles**

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Plt ID: 147-00054
Reviewer: Jeff Scull
Date: 7/1/2009

The following calculations determine the amount of emissions created by wind erosion of storage stockpiles, based on 8,760 hours of use and USEPA's AP-42 (Pre 1983 Edition), Section 11.2.3.

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

where E_f = emission factor (lb/acre/day)
 s = silt content (wt %)
 p = 110 days of rain greater than or equal to 0.01 inches
 f = 15 % of wind greater than or equal to 12 mph

Material	Silt Content (wt %) ^a	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)	PTE of PM (tons/yr)	PTE of PM10 (tons/yr)	PTE of PM2.5 (tons/yr)
Coal	4.6	5.66	1.02	1.053	0.369	0.116
Coal	4.6	5.66	1.02	1.053	0.369	0.116
Totals				2.11	0.74	0.23

Methodology

PTE of PM (tons/yr) = [Emission Factor (lb/acre/day)] * [Maximum Pile Size (acres)] * (ton/2000 lbs) * (8760 hours/yr)

PTE of PM10 (tons/yr) = [Potential PM Emissions (tons/yr)] * 35%

^a Silt content values obtained from AP-42 Table 13.2.4-1 (dated 11/06)

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
Coal Handling, and Conveying
Unlimited Emissions**

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Pit ID: 147-00054
Reviewer: Jeff Scull
Date: 7/6/2009

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$Ef = k * (0.0032) * [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: Ef = Emission factor (lb/ton)

- k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
- k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
- k (PM2.5) = 0.053 = particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
- U = 8 = worst case annual mean wind speed (Source: NOAA, 2008*)
- M = 10.0 = material % moisture content of coal (provided by applicant on June 27, 2002 construction application)
- Ef (PM) = 4.58E-04 lb PM/ton of material handled
- Ef (PM10) = 2.17E-04 lb PM10/ton of material handled
- Ef (PM2.5) = 3.28E-05 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 600,000 tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)	Unlimited/Uncontrolled PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	0.14	0.07	0.01
Front-end loader dumping of materials into feeder bins	0.14	0.07	0.01
Conveyor dropping material into conveyor or storage pile.	0.14	0.07	0.01
Total (tons/yr)	0.41	0.20	0.03

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.

Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (Evansville, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

Coal Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10/PM2.5 (tons/yr)**
Conveying	0.003	0.0011	0.90	0.33
Unlimited Potential to Emit (tons/yr) =			0.90	0.33

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.

Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * [Emission Factor (lb/ton)] * [(ton/2000 lbs)

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (Table 11.19.2-2).

**Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PM2.5 = Particulate matter (< 2.5 um)

PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
Coal by-products Handling, and Conveying
Unlimited Emissions**

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Pit ID: 147-00054
Reviewer: Jeff Scull
Date: 7/6/2009

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k \cdot (0.0032)^{1.3} \cdot (U/5)^{1.3} / (M/2)^{1.4}$$

where: E_f = Emission factor (lb/ton)

- k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
- k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
- k (PM2.5) = 0.053 = particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
- U = 8 = worst case annual mean wind speed (Source: NOAA, 2008*)
- M = 20.0 = material % moisture content of coal (provided by applicant on June 27, 2002 construction application)
- E_f (PM) = 1.74E-04 lb PM/ton of material handled
- E_f (PM10) = 8.21E-05 lb PM10/ton of material handled
- E_f (PM2.5) = 1.24E-05 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 300,000 tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)	Unlimited/Uncontrolled PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	0.03	0.01	0.00
Front-end loader dumping of materials into feeder bins	0.03	0.01	0.00
Conveyor dropping material into conveyor or storage pile.	0.03	0.01	0.00
Total (tons/yr)	0.08	0.04	0.01

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.

Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)

*Worst case annual mean wind speed (Evansville, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

Coal by-products Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10/PM2.5 (tons/yr)**
Conveying	0.003	0.0011	0.45	0.17
Unlimited Potential to Emit (tons/yr) =			0.45	0.17

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.

Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * [Emission Factor (lb/ton)] * [(ton/2000 lbs)

Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2

*Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (Table 11.19.2-2).

**Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PM2.5 = Particulate matter (< 2.5 um)

PTE = Potential to Emit

**Appendix A.1: Emissions Calculations
Fertilizer Handling, and Conveying
Unlimited Emissions**

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Pit ID: 147-00054
Reviewer: Jeff Scull
Date: 7/6/2009

Batch or Continuous Drop Operations (AP-42 Section 13.2.4)

To estimate potential fugitive dust emissions from processing and handling of raw materials (batch or continuous drop operations), AP-42 emission factors for Aggregate Handling, Section 13.2.4 (fifth edition, 1/95) are utilized.

$$E_f = k * (0.0032) * [(U/5)^{1.3} / (M/2)^{1.4}]$$

where: E_f = Emission factor (lb/ton)

- k (PM) = 0.74 = particle size multiplier (0.74 assumed for aerodynamic diameter <=100 um)
- k (PM10) = 0.35 = particle size multiplier (0.35 assumed for aerodynamic diameter <=10 um)
- k (PM2.5) = 0.053 = particle size multiplier (0.053 assumed for aerodynamic diameter <=2.5 um)
- U = 8 = worst case annual mean wind speed (Source: NOAA, 2008*)
- M = 10.0 = material % moisture content of coal (provided by applicant on June 27, 2002 construction application)
- E_f (PM) = 4.58E-04 lb PM/ton of material handled
- E_f (PM10) = 2.17E-04 lb PM10/ton of material handled
- E_f (PM2.5) = 3.28E-05 lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 60,000 tons/yr

Type of Activity	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10 (tons/yr)	Unlimited/Uncontrolled PTE of PM2.5 (tons/yr)
Truck unloading of materials into storage piles	0.01	0.01	0.00
Front-end loader dumping of materials into feeder bins	0.01	0.01	0.00
Conveyor dropping material into conveyor or storage pile.	0.01	0.01	0.00
Total (tons/yr)	0.04	0.02	0.00

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.
 Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * (Emission Factor (lb/ton)) * (ton/2000 lbs)
 *Worst case annual mean wind speed (Evansville, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008

Fertilizer Conveying (AP-42 Section 11.19.2)

To estimate potential fugitive dust emissions from conveying, AP-42 emission factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04) are utilized.

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)*	Unlimited/Uncontrolled PTE of PM (tons/yr)	Unlimited/Uncontrolled PTE of PM10/PM2.5 (tons/yr)**
Conveying	0.003	0.0011	0.09	0.03
Unlimited Potential to Emit (tons/yr) =			0.09	0.03

Methodology

Maximum Material Handling Throughput (tons/yr) = Annual Throughput provided by applicant on June 27, 2002 construction application.
 Unlimited Potential to Emit (tons/yr) = (Maximum Material Handling Throughput (tons/yr)) * [Emission Factor (lb/ton)] * [(ton/2000 lbs)
 Emission Factors from AP-42 Chapter 11.19.2 (dated 8/04), Table 11.19.2-2
 *Uncontrolled emissions factors for PM/PM10 represent tertiary crushing of stone with moisture content ranging from 0.21 to 1.3 percent by weight (Table 11.19.2-2).
 **Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate matter (< 2.5 um)
 PTE = Potential to Emit

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Pt ID: 147-00054
Reviewer: Jeff Scull
Date: 7/2/2009

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Empty Trucks entering plant (one-way trip)	120.0	1.0	120.0	14.0	1680.0	1000	0.189	22.7	8295.5
Full Trucks leaving plant (one-way trip)	120.0	1.0	120.0	40.0	4800.0	1000	0.189	22.7	8295.5
Automobiles entering plant (one way trip)	30.0	1.0	30.0	2.0	60.0	1000	0.189	5.7	2073.9
Automobiles leaving plant (one way trip)	30.0	1.0	30.0	2.0	60.0	1000	0.189	5.7	2073.9
Total			300.0		6600.0			56.8	20738.6

Average Vehicle Weight Per Trip = $\frac{22.0}{0.19}$ tons/trip
Average Miles Per Trip = $\frac{22.0}{0.19}$ miles/trip

Unmitigated Emission Factor, $E_f = k \left[\frac{s}{12} \right]^a \left[\frac{W}{3} \right]^b$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2.2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	22.0	22.0	tons = average vehicle weight (provided by source)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot \left[\frac{365 - P}{365} \right]$
Mitigated Emission Factor, $E_{ext} = E_f \cdot \left[\frac{365 - P}{365} \right]$
where P = 110 days of rain greater than or equal to 0.01 inches (from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2008 for Evans)

Unmitigated Emission Factor, E_f =	$\frac{6.32}{4.42}$	$\frac{1.61}{1.13}$	lb/mile
Mitigated Emission Factor, E_{ext} =	$\frac{4.42}{50\%}$	$\frac{1.13}{50\%}$	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10* (tons/yr)		Mitigated PTE of PM10* (tons/yr)		Controlled PTE of PM10* (tons/yr)	
		PM2.5	PM10	PM2.5	PM10	PM2.5	PM10
Empty Trucks entering plant (one-way trip)	26.23	6.69	18.33	4.67	9.16	2.34	4.67
Full Trucks leaving plant (one-way trip)	26.23	6.69	18.33	4.67	9.16	2.34	4.67
Automobiles entering plant (one way trip)	6.56	1.67	4.58	1.17	2.29	0.58	1.17
Automobiles leaving plant (one way trip)	6.56	1.67	4.58	1.17	2.29	0.58	1.17
	65.58	16.71	45.82	11.68	22.91	5.84	11.68

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)
*Assumes PM10 = PM2.5

Abbreviations

PM = Particulate Matter
PM10 = Particulate Matter (<10 um)
PM2.5 = Particulate matter (< 2.5 um)
PTE = Potential to Emit

**Appendix A: Emissions Calculations
Transferring and Handling Operation
6-3-2 Particulate Matter allowable Emission Rate**

**Company Name: Rockport River Terminals, Inc.
Address City IN Zip: 2932 East State Road 66, Rockport, IN 47635
Permit Number: M147-28155-00054
Plt ID: 147-00054
Reviewer: Jeff Scull
Date: 8/12/2009**

Emission Point	Process Description	Control Description	Hourly Capacity (tons/hour)	Emission Factor* (lbs/ton)	Control Efficiency	PTE of PM before control (lbs/hr)	326 IAC 6-3-2 Allowable Emission Rate (lbs/hour)
Barge Loadout	Transfer Point	None	750	4.58E-04	0%	0.34	exempt**
Bucket Unloader to Conveyer	Transfer Point	None	750	4.58E-04	0%	0.34	exempt**
Truck to Conveyer	Transfer Point	None	750	4.58E-04	0%	0.34	exempt**
Endloader to Truck	Transfer Point	None	500	4.58E-04	0%	0.23	exempt**
Endloader to Hopper	Transfer Point	None	500	4.58E-04	0%	0.23	exempt**
Conveyer to Conveyer	Transfer Point	None	750	4.58E-04	0%	0.34	exempt**
Belt Conveyer	Product Handling	None	750	3.00E-03	0%	2.25	73.93

*NOTE: Emission Factor used in calculations is the worst case for the three different materials handled.

**NOTE: 326 IAC 6-3-1(b)14 states that Manufacturing Processes with potential emissions less than five hundred fifty-one thousandths (0.551) pound per hour are exempt from 326 IAC 6-3.

Emission Factors : Emission factors for each material were calculated on pages 3, 4, and 5 of this TSD Appendix A.
Fertilizer = 4.58E-04 lb PM/ton of material handled.
Coal by-products = 1.74E-04 lb PM/ton of material handled.
Coal = 4.58E-04 lb PM/ton of material handled.

Methodology

PTE of PM before Control (lbs/hr) = Maximum Throughput (tons/hr) x Emission Factor (lb/ton)

326 IAC 6-3-2 Allowable Emission Rate based on the following formula: $E = 55.0 P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour



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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Bruce Kanipe
Rockport River Terminals, Inc.
2932 East SR 66
Rockport, IN 47635

DATE: October 22, 2009

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

SUBJECT: Final Decision
MSOP-Renewal
147-28155-00054

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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

October 22, 2009

TO: Spencer County Public Library

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

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: Rockport River Terminals, Inc.
Permit Number: 147-28155-00054

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 10/22/2009 Rockport River Terminals, Inc. 147-28155-00054 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee
											Remarks
1		A. Bruce Kanipe Rockport River Terminals, Inc. 2932 East SR 66 Rockport IN 47635 (Source CAATS) (CONFIRM DELIVERY)									
2		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)									
3		Ms. Francis Lueken 223 W. 10th Street, P.O. Box 206 Ferdinand IN 47532 (Affected Party)									
4		Rockport City Council and Mayors Office P.O. Box 151 Rockport IN 47635 (Local Official)									
5		Spencer Co Public Library 210 N Walnut St Rockport IN 47635-1398 (Library)									
6		Ms. Kathy Tretter Dubois-Spencer Counties Publishing Co, Inc P.O. Box 38 Ferdinand IN 47532-0038 (Affected Party)									
7		Spencer County Commissioner/Health Dept. 200 Main Street, Courthouse Rockport IN 47635 (Affected Party)									
8		Spencer County Commissioners 200 Main St., Courthouse Rockport IN 47635 (Local Official)									
9		Spencer County Health Department Main Street Courthouse, 1st Floor, Room 1 Roackport IN 47635-1492 (Health Department)									
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)									
11		Ben Quinn, Jr. American Engineers, Inc. 2500 Nelson Miller Pkwy Louisville KY 40223 (Consultant)									
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--