



# 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](http://www.idem.IN.gov)

TO: Interested Parties / Applicant

DATE: Mar. 30, 2011

RE: Gibbco, Inc. / 029-29391-00014

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](http://www.idem.IN.gov)

## Federally Enforceable State Operating Permit OFFICE OF AIR QUALITY

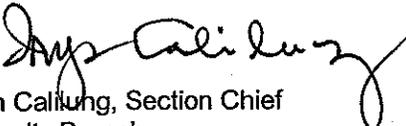
**Gibbco, Inc.**  
**901 AEP Drive**  
**Lawrenceburg, Indiana 47025**

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

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

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

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

Operation Permit No.: F029-29391-00014	
Issued by:  Iryn Callung, Section Chief Permits Branch Office of Air Quality	Issuance Date: Mar. 30, 2011 Expiration Date: Mar. 30, 2016

## TABLE OF CONTENTS

<b>A. SOURCE SUMMARY</b> .....	<b>4</b>
A.1 General Information [326 IAC 2-8-3(b)]	
A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]	
A.3 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]	
A.4 FESOP Applicability [326 IAC 2-8-2]	
<b>B. GENERAL CONDITIONS</b> .....	<b>6</b>
B.1 Definitions [326 IAC 2-8-1]	
B.2 Permit Term [326 IAC 2-8-4(2)][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 [326 IAC 2-8-6] [IC 13-17-12]	
B.5 Severability [326 IAC 2-8-4(4)]	
B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]	
B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]	
B.8 Certification [326 IAC 2-8-3(d)][326 IAC 2-8-4(3)(C)(i)][326 IAC 2-8-5(1)]	
B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]	
B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]	
B.11 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]	
B.12 Emergency Provisions [326 IAC 2-8-12]	
B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]	
B.14 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3(h)]	
B.15 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]	
B.16 Permit Renewal [326 IAC 2-8-3(h)]	
B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]	
B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]	
B.19 Source Modification Requirement [326 IAC 2-8-11.1]	
B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2] [IC 13-30-3-1]	
B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]	
B.22 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]	
B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314] [326 IAC 1-1-6]	
<b>C. SOURCE OPERATION CONDITIONS</b> .....	<b>15</b>
<b>Emission Limitations and Standards [326 IAC 2-8-4(1)]</b>	
C.1 Overall Source Limit [326 IAC 2-8]	
C.2 Opacity [326 IAC 5-1]	
C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5 Fugitive Dust Emissions [326 IAC 6-4]	
C.6 Stack Height [326 IAC 1-7]	
C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
<b>Testing Requirements [326 IAC 2-8-4(3)]</b>	
C.8 Performance Testing [326 IAC 3-6]	
<b>Compliance Requirements [326 IAC 2-1.1-11]</b>	
C.9 Compliance Requirements [326 IAC 2-1.1-11]	

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

**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]
- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]
- C.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

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

**Stratospheric Ozone Protection**

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

**D.1. EMISSIONS UNIT OPERATION CONDITIONS..... 22**

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

- D.1.1 PSD Limits [326 IAC 2-2]
- D.1.2 FESOP Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3][326 IAC 2-1.1-5]
- D.1.3 Particulate Emission Limitations [326 IAC 6.5-1-2]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

**Compliance Determination Requirements**

- D.1.5 Particulate Matter (PM, PM10, and PM2.5) Control
- D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

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

- D.1.7 Visible Emissions Notations
- D.1.8 Wet Scrubber Parametric Monitoring
- D.1.9 Wet Scrubber Failure Detection

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

- D.1.10 Record Keeping Requirement

Certification Form ..... 26  
Emergency Occurrence Form ..... 27  
FESOP Quarterly Report Forms ..... 29  
Quarterly Deviation and Compliance Monitoring Report Form ..... 30

## 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 stationary wet-bottom boiler slag processing operation, producing roofing granules and shotblasting grit.

Source Address:	901 AEP Drive, Lawrenceburg, Indiana 47025
General Source Phone Number:	(812) 537-2405
SIC Code:	3295
County Location:	Dearborn
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD, Nonattainment New Source Review, 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 [326 IAC 2-8-3(c)(3)]

---

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

- (a) Boiler slag processing facilities, installed in 1972, with a maximum throughput of twenty-five (25) tons per hour of wet-bottom boiler slag, with particulate matter controlled by a wet scrubber, exhausting through Stack # 1, and including the following:
  - (1) One (1) seven (7.0) mmBtu/hr natural gas-fired rotary dryer, identified as Unit 1, with a maximum throughput capacity of twenty-five (25) tons of boiler slag per hour, with a dust pickup at the outlet that directs particulate matter emissions to the wet scrubber;
  - (2) Screening facilities, identified as Oversize Screening (Unit 3) and including Screening East (Unit 4), Screening West (Unit 5), and Screening # 30 (Unit 7), each with a dust pickup that directs particulate matter emissions to the wet scrubber;
  - (3) One (1) crusher, identified as Unit 6, with a dust pickup that directs particulate matter emissions to the wet scrubber; and
  - (4) Boiler slag storage facilities, identified as Storage Hopper #11 (Unit 8) and Storage Hopper # 30 (Unit 9), with boiler slag carried to the hoppers by conveyor and dropped from the hoppers to trucks for transportation offsite or to the onsite railcar loading station. A dust screen before the hopper has a dust pickup that directs particulate matter to the scrubber, and oil is sprayed onto the boiler slag as needed for dust control as the boiler slag is transferred to the trucks.

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

This stationary source also includes the following insignificant activities:

- (a) One (1) feed hopper, identified as Unit 2, preceded by a dust screen with a dust pickup that directs particulate matter emissions to the wet scrubber. [326 IAC 6.5]
- (b) Enclosed conveyors. [326 IAC 6.5]
- (c) One (1) railcar loading station constructed in 1981, located onsite approximately one-quarter (1/4) mile west of the boiler slag drying and screening operations. Material is trucked to the loading station, and then dropped into a hopper for transfer by conveyor to rail cars. [326 IAC 6.5, 326 IAC 6-4]
- (d) Wet-bottom boiler slag storage pile(s), with a maximum anticipated pile size of seventy-five hundredths (0.75) acres, handled by front end loader; [326 IAC 6-4]
- (e) Unpaved plant roads and ground surface in work areas without public access, some with boiler slag as surface material. [326 IAC 6-4]
- (f) Unpaved roads and parking lots with public access. [326 IAC 6-4]
- (g) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (h) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities; and
- (i) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

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, F029-29391-00014, 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] [IC 13-17-12]**

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. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:
- (1) it contains a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1), and
  - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

The Permittee shall implement the PMPs.

- (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. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, or Southeast Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Southeast Regional Office phone: (812) 358-2027; fax: (812) 358-2058.

- (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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.

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

- (a) All terms and conditions of permits established prior to F029-29391-00014 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 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.16 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 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, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 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  
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.18 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  
Permit Administration and Support Section, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
  
and

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

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

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

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

- (b) **Emission Trades [326 IAC 2-8-15(c)]**  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.19 Source Modification Requirement [326 IAC 2-8-11.1]**

---

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

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]**

---

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

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

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

B.21 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  
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 does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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.22 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 no later than 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.23 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) Pursuant to 326 IAC 2-2 (PSD), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (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 5-1-1 (Applicability) and 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 thirty percent (30%) 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 except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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 Stack Height [326 IAC 1-7]

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

C.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 demolitions 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 that meets the requirements of 326 IAC 2-8-5(a)(1) 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) For performance testing required by this permit, 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, 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 and Enforcement 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]**

---

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

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

#### **C.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 and Enforcement Branch, Office of Air Quality  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251

no later than ninety (90) days after the date of issuance of this permit.

The ERP does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to 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 excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
  - (1) initial inspection and evaluation;
  - (2) recording that operations returned or are returning 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 normal or usual manner of operation.
- (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 record the reasonable response steps 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 submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) 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 a certification that meets the requirements of 326 IAC 2-8-5(a)(1) 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, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

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 except that 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. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) The first report shall cover the period commencing on the date of issuance of this permit or the date of initial start-up, whichever is later, 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 applicable standards for recycling and emissions reduction.

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

### Emissions Unit Description:

- (a) Boiler slag processing facilities, installed in 1972, with a maximum throughput capacity of twenty-five (25) tons per hour of wet-bottom boiler slag, with particulate matter controlled by a wet scrubber, exhausting through Stack # 1, and including the following:
- (1) One (1) seven (7.0) mmBtu/hr natural gas-fired rotary dryer, identified as Unit 1, with a maximum throughput capacity of twenty-five (25) tons of boiler slag per hour, with a dust pickup at the outlet that directs particulate matter emissions to the wet scrubber;
  - (2) Screening facilities, identified as Oversize Screening (Unit 3) and including Screening East (Unit 4), Screening West (Unit 5), and Screening # 30 (Unit 7), each with a dust pickup that directs particulate matter emissions to the wet scrubber;
  - (3) One (1) crusher, identified as Unit 6, with a dust pickup that directs particulate matter emissions to the wet scrubber; and
  - (4) Boiler slag storage facilities, identified as Storage Hopper #11 (Unit 8) and Storage Hopper # 30 (Unit 9), with boiler slag carried to the hoppers by conveyor and dropped from the hoppers to trucks for transportation offsite or to the onsite railcar loading station. A dust screen before the hopper has a dust pickup that directs particulate matter to the scrubber, and oil is sprayed onto the boiler slag as needed for dust control as the boiler slag is transferred to the trucks.

### Insignificant activities:

- (a) One (1) feed hopper, identified as Unit 2, preceded by a dust screen with a dust pickup that directs particulate matter emissions to the wet scrubber. [326 IAC 6.5]
- (b) Enclosed conveyors. [326 IAC 6.5]
- (c) One (1) railcar loading station constructed in 1981, located onsite approximately one-quarter (1/4) mile west of the boiler slag drying and screening operations. Material is trucked to the loading station, and then dropped into a hopper for transfer by conveyor to rail cars. [326 IAC 6.5, 326 IAC 6-4]

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

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

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

In order to render the requirements of 326 IAC 2-2 not applicable, the Permittee shall comply with the following:

- (a) The maximum amount of boiler slag processed through the rotary dryer shall not exceed 71,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) PM emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed two and ninety-eight hundredths (2.98) pounds of PM per ton of slag processed.

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

**D.1.2 FESOP Limits [326 IAC 2-8-4][326 IAC 2-2][326 IAC 2-3][326 IAC 2-1.1-5]**

---

Pursuant to 326 IAC 2-8-4, the Permittee shall comply with the following:

- (a) The maximum amount of boiler slag processed through the rotary dryer shall not exceed 71,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) PM10 emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed one and forty-two hundredths (1.42) pounds of PM per ton of slag processed.
- (c) PM2.5 emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed one and forty-two hundredths (1.42) pounds of PM per ton of slag processed.
- (d) SO2 emissions from the seven (7.0) mmBtu/hr natural gas-fired rotary dryer stack exhaust shall not exceed two and eighty hundredths (2.80) pounds of SO2 per ton of slag processed.

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and SO2 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and SO2 to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-1.1-5 (Nonattainment New Source Review), and 326 IAC 2-3 (Emission Offset), not applicable.

**D.1.3 Particulate Emission Limitations [326 IAC 6.5-1-2]**

---

Pursuant to 326 IAC 6.5-1-2 (Particulate Matter Limitations Except Lake County), particulate matter (PM) emissions from the slag drying, crushing, screening, conveying, storage, and railcar loading operations, each, shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)).

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

---

A Preventive Maintenance Plan is required for this facility and any corresponding control device(s). Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

**Compliance Determination Requirements**

**D.1.5 Particulate Matter (PM, PM10, and PM2.5) Control**

---

- (a) In order to comply with Conditions D.1.1(a), D.1.2(a), D.1.2(b), and D.1.3, the wet scrubber for the slag drying, crushing, screening, conveying, and storage operations, shall be in operation and control emissions from the slag drying, crushing, screening, conveying, and storage operations at all times that any of the slag drying, crushing, screening, conveying, and storage operations are in operation.
- (b) In order to comply with Condition D.1.3, the dust pickups for particulate control of the material transfer points, such as the dryer outlet dust pickup point, hopper loading, truck loading, and railcar loading operations, shall be in operation and control emissions from the material transfer points at all times that any of the corresponding material transfer operations are in operation.

**D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]**

---

- (a) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform PM testing on the wet scrubber serving the slag drying, crushing, screening, conveying, and storage operations, utilizing methods approved by the Commissioner, at least once every five (5) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition.
- (b) In order to demonstrate compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall perform PM10 and PM2.5 testing on the wet scrubber serving the slag drying, screening, crushing, conveying, and storage operations, not later than five (5) years from the most recent valid compliance demonstration. This testing shall be conducted utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

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

**D.1.7 Visible Emissions Notations**

---

- (a) Daily visible emission notations of the wet scrubber, used in conjunction with the slag drying, screening, crushing, conveying, and storage operations, stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) Daily visible emission notations of the material transfer points, such as the dryer outlet dust pickup point, hopper loading, truck loading, and railcar loading operations, shall be performed during normal daylight operations when the associated process is in operation. A trained employee shall record whether emissions are normal or abnormal.
- (c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

#### D.1.8 Wet Scrubber Parametric Monitoring

---

The Permittee shall record the pressure drop across the wet scrubber, used in conjunction with the slag drying, crushing, screening, conveying, and storage operations, at least once per day when any of the slag drying, crushing, screening, conveying, and storage operations, are in operation. When for any one reading, the pressure drop across the wet scrubber is outside the normal range of two (2.0) and eight (8.0) inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above-mentioned range is not a deviation from this permit. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.9 Wet Scrubber Failure Detection

---

In the event that scrubber failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

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

#### D.1.10 Record Keeping Requirement

---

- (a) To document the compliance status with Conditions D.1.1(a), and D.1.2(a), the Permittee shall keep monthly records of the amount of boiler slag processed through the rotary dryer.
- (b) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of visible emission notations of the wet scrubber stack exhaust once per day. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain records once per day of the pressure drop during normal operation. The Permittee shall include in its daily record when the pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: Gibbco, Inc.  
Source Address: 901 AEP Drive, Lawrenceburg, Indiana 47025  
FESOP Permit No.: F029-29391-00014

**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  
100 North Senate Avenue  
MC 61-53 IGCN 1003  
Indianapolis, Indiana 46204-2251  
Phone: (317) 233-0178  
Fax: (317) 233-6865**

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

Source Name: Gibbco, Inc.  
Source Address: 901 AEP Drive, Lawrenceburg, Indiana 47025  
FESOP Permit No.: F029-29391-00014

**This form consists of 2 pages**

**Page 1 of 2**

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

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 <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

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

**FESOP Quarterly Report**

Source Name: Gibbco, Inc.  
Source Address: 901 AEP Drive, Lawrenceburg, Indiana 47025  
FESOP Permit No.: F029-29391-00014  
Facility: Slag Dryer  
Parameter: Maximum Amount of Boiler Slag Processed  
Limit: 71,000 tons per twelve (12) month period with compliance determined at the end of each month

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

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

No deviation occurred in this month.

Deviation/s occurred in this month.

Deviation has been reported on \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH**

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

Source Name: Gibbco, Inc.  
Source Address: 901 AEP Drive, Lawrenceburg, Indiana 47025  
FESOP Permit No.: F029-29391-00014

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

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

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

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document (ATSD) for a Part 70/Title V Permit (TV) Transitioning to a Federally Enforceable State Operating Permit (FESOP)

### Source Background and Description

**Source Name:** Gibbco, Inc.  
**Source Location:** 901 AEP Drive, Lawrenceburg, IN 47025  
**County:** Dearborn  
**SIC Code:** 3295  
**Operation Permit No.:** F029-29391-00014  
**Permit Reviewer:** Hannah L. Desrosiers

On February 22, 2011, the Office of Air Quality (OAQ) had a notice published in the Journal Press, Lawrenceburg, Indiana, stating that Gibbco, Inc. had submitted an application requesting a transition from their existing Part 70 Operating Permit (TV), issued on March 29, 2006, to a Federally Enforceable State Operating Permit (FESOP). The notice also stated that the OAQ proposed to issue a FESOP for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

### Comments and Responses

On Thursday, March 24, 2011, Kathy Moore, Senior Project Manager, Keramida Inc., on behalf of Gibbco, Inc., submitted comments to IDEM, OAQ on the draft FESOP.

The Technical Support Document (TSD) is used by IDEM, OAQ for historical purposes. IDEM, OAQ does not make any changes to the original TSD, but the Permit will have the updated changes. The comments and revised permit language are provided below with deleted language as ~~strikeouts~~ and new language **bolded**.

#### Comment 1:

Please revise Condition D.1.6(a) as follows to reflect the date the next PM testing must be completed:

#### D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

- (a) In order to demonstrate compliance with Condition D.1.1(a), the Permittee shall perform PM testing on the wet scrubber serving the slag drying, crushing, screening, conveying, and storage operations, utilizing methods approved by the Commissioner, **no later than September 10, 2015** ~~at least once every five (5) years from the date of the most recent valid compliance demonstration~~. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition

#### Response to Comment 1:

IDEM does not agree with the recommended change. Previously, in January 2009, IDEM determined that it is the Permittee's responsibility to maintain records of testing and parametric monitoring of control equipment. Since the Permittee is in the best position to track the occurrence of control device testing, especially in the event that the Permittee might test early, or have to retest, throwing off the testing cycle, the conditions requiring testing were modified to remove the date by which the

next test must be conducted, from the permit. This was not a change to the nature or frequency of the testing requirement since the date listed was based on the frequency listed. Therefore, in keeping with this previous decision, IDEM has decided not to list the due date of the next performance test, but instead to just list the frequency of the testing since the last valid test. Note: for the Permittee's convenience, the date of the last valid stack test was indicated in the TSD, page 12 of 13.

No changes were made as a result of this comment.

## Comment 2:

Gibbco Inc. (Gibbco) respectfully requests the PM10 and PM2.5 testing be required at the time of the next requisite PM test. Gibbco completed PM testing on September 10, 2010 and we are requesting these results be used to indicate compliance with the proposed PM10 and PM2.5 limit of 1.42 lbs/ton in the draft permit. The September 10, 2010 stack test resulted in a PM emission rate of 1.21 lbs of PM/hr, which at a process weight rate of 25 tons per hour is equivalent to 0.0484 lbs of PM/ton of slag processed. This emission rate is significantly less than the proposed limit of 1.42 lbs/ton. In addition, because the control device is a wet scrubber and the stack temperature during the test was 79 degrees, we would not anticipate condensable emissions of any significance.

Based on the comment above, please revise Condition D.1.6(b) as follows:

### D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

- (b) In order to demonstrate compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall perform PM10 and PM2.5 testing on the wet scrubber serving the slag drying, screening, crushing, conveying, and storage operations, **no later than September 10, 2015** ~~not later than one hundred eighty (180) days after the issuance of this FESOP, No.: F029-29391-00014, or not later than five (5) years from the most recent valid compliance demonstration, whichever is later.~~ This testing shall be conducted utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

## Response to Comment 2:

IDEM has reviewed Gibbco's request that PM10 and PM2.5 testing be required at the time of the next requisite PM test and determined that this is acceptable.

The permit has been revised as follows:

### D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

\*\*\*\*\*

- (b) In order to demonstrate compliance with Conditions D.1.2(a) and D.1.2(b), the Permittee shall perform PM10 and PM2.5 testing on the wet scrubber serving the slag drying, screening, crushing, conveying, and storage operations, not later than ~~one hundred eighty (180) days after the issuance of this FESOP, No.: F029-29391-00014, or not later than five (5) years from the most recent valid compliance demonstration, whichever is later.~~ This testing shall be conducted utilizing methods approved by the Commissioner. These tests shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C - Performance Testing contains the Permittee's obligation

with regard to the performance testing required by this condition. PM10 and PM2.5 includes filterable and condensable PM.

IDEM disagrees with the request to revise Condition D.1.6(b) to reflect the date the next PM10/PM2.5 testing must be completed. See Response to Comment1.

<b>IDEM Contact</b>
---------------------

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (b) A copy of the permit 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](http://www.idem.in.gov)

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

Technical Support Document (TSD) for a  
Part 70/Title V Permit (TV) Transitioning to a  
Federally Enforceable State Operating Permit (FESOP)

<b>Source Description and Location</b>
--

<b>Source Name:</b>	Gibbco, Inc.
<b>Source Location:</b>	901 AEP Drive, Lawrenceburg, IN 47025
<b>County:</b>	Dearborn
<b>SIC Code:</b>	3295
<b>Operation Permit No.:</b>	F029-29391-00014
<b>Permit Reviewer:</b>	Hannah L. Desrosiers

On June 24, 2010, the Office of Air Quality (OAQ) received an application from Gibbco, Inc., related to the transition from a Part 70 Permit (aka Title V (TV)) to a Federally Enforceable State Operating Permit (FESOP). The requested transition was accomplished as follows:

Gibbco, Inc. has agreed to accept a federally enforceable a ton per year (ton/yr) maximum annual slag processing limit, and pound per ton (lb/ton) emission limitations on their slag drying, crushing, screening, conveying, and storage operations. Additionally, Gibbco, Inc. has installed control device monitoring equipment, and has agreed to monitor and maintain the control device according to standard FESOP requirements. Therefore, the transition from TV to FESOP is supported.

Additionally, Gibbco, Inc. wishes to clarify that they use wet-bottom boiler slag, not bottom ash, to make grit for shingles and sandblast media.

<b>Source Definition</b>
--------------------------

On June 16, 2004, IDEM, OAQ, conducted a source determination for the following sources:

- (a) Plant 1 (Indiana Michigan Power - Tanners Creek Plant), the primary operation, located at 800 AEP Drive, Lawrenceburg, Indiana, (Permit No.: T029-6785-00002, issued December 7, 2004); and
- (b) Plant 2 (Gibbco, Inc.), the on-site contractor, located at 901 AEP Drive, Lawrenceburg, Indiana, (Permit #T029-7100-00014, issued March 29, 2006).

In order to consider both plants as one single source, all three of the following criteria needed to be met:

- (1) The plants must have common ownership/control;
- (2) The plants must have the same SIC code; and
- (3) The plants must be located on contiguous or adjacent properties.

These plants are located on contiguous properties; however, Tanners Creek and Gibbco do not operate under the same SIC Code, do not meet the definition of common ownership, and since less than fifty percent (50%) of the total boiler slag received by Gibbco, Inc. is received from the Tanners Creek station, are still not under "common control". Additionally, the percentage of boiler slag received from the Tanners Creek station has not increased to previous levels because Tanners Creek station's Unit 4 boiler was reconfigured to use over-fire air and deep staging for NOx control during the ozone season, producing a boiler slag material that is not suitable for roofing granules. Therefore, based on this evaluation these plants are not considered one (1) source, as defined by 326 IAC 2-7-1(22). This determination was initially made under an Addendum to the TSD for the Tanners Creek Plant TV, No.: T 029-6785-00002, issued December 7, 2004.

### Existing Approvals

The source has been operating under TV No.: T029-7100-00014, issued on March 29, 2006.

Due to this application, the source is transitioning from a TV to a FESOP.

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.

### County Attainment Status

The source is located in Lawrenceburg Township, Dearborn County. The following attainment status designations are applicable to Lawrenceburg Township, Dearborn County:

Pollutant	Designation
SO <sub>2</sub>	Cannot be classified.
CO	Unclassifiable or attainment effective November 15, 1990.
O <sub>3</sub>	Attainment effective June 4, 2010 for the 8-hour ozone standard for the Lawrenceburg Township of Dearborn County. The remainder of Dearborn County is unclassifiable or attainment effective June 15, 2004, for the 8-hour ozone standard. <sup>1</sup>
PM <sub>10</sub>	Unclassifiable effective November 15, 1990.
PM <sub>2.5</sub>	Basic nonattainment designation effective federally April 5, 2005, for the Lawrenceburg Twp for PM <sub>2.5</sub> . The remainder of Dearborn County is unclassifiable or attainment effective April 5, 2005, for PM <sub>2.5</sub> .
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.

<sup>1</sup>Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.

(a) Ozone Standards

Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) 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 NO<sub>x</sub> 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 NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) PM<sub>2.5</sub>

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Dearborn County, Lawrenceburg Township, as nonattainment for PM<sub>2.5</sub>. On March 7, 2005, the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM<sub>2.5</sub> promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM<sub>2.5</sub> and SO<sub>2</sub> emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

(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.

### Background and Description of Existing Permitted Emission Units

The Office of Air Quality (OAQ) has reviewed an application, submitted by Gibbco, Inc. on June 24, 2010, relating to the transition from their Title V (TV), issued on March 29, 2006, to a Federally Enforceable State Operating Permit (FESOP). This source processes wet-bottom boiler slag to make grit for shingles and sandblasting media.

This existing source consists of the following permitted emission unit(s):

- (a) Boiler slag processing facilities, installed in 1972, with a maximum throughput of twenty-five (25) tons per hour of wet-bottom boiler slag, with particulate matter controlled by a wet scrubber, exhausting through Stack # 1, and including the following:
  - (1) One (1) seven (7.0) mmBtu/hr natural gas-fired rotary dryer, identified as Unit 1, with a maximum throughput capacity of twenty-five (25) tons of boiler slag per hour, with a dust pickup at the outlet that directs particulate matter emissions to the wet scrubber;
  - (2) Screening facilities, identified as Oversize Screening (Unit 3), Screening East (Unit 4), Screening West (Unit 5), and Screening # 30 (Unit 7), each with a dust pickup that directs particulate matter emissions to the wet scrubber;
  - (3) One (1) crusher, identified as Unit 6, with a dust pickup that directs particulate matter emissions to the wet scrubber; and
  - (4) Boiler slag storage facilities, identified as Storage Hopper #11 (Unit 8) and Storage Hopper # 30 (Unit 9), with boiler slag carried to the hoppers by conveyor and dropped from the hoppers to trucks for transportation offsite or to the onsite railcar loading station. A dust screen before the hopper has a dust pickup that directs particulate matter to the wet scrubber, and oil is sprayed onto the boiler slag as needed for dust control as the boiler slag is transferred to the trucks.
- (e) Insignificant activities consisting of the following:
  - (1) One (1) feed hopper, identified as Unit 2, preceded by a dust screen with a dust pickup that directs particulate matter emissions to the wet scrubber; [326 IAC 6.5]
  - (2) Enclosed conveyors; [326 IAC 6.5]
  - (3) One (1) railcar loading station constructed in 1981, located onsite approximately one-quarter (1/4) mile west of the boiler slag drying and screening operations. Material is trucked to the loading station, and then dropped into a hopper for transfer by conveyor to railcars; [326 IAC 6.5, 326 IAC 6-4]
  - (4) Wet-bottom boiler slag storage pile(s), with a maximum anticipated pile size of seventy-five hundredths (0.75) acres, handled by front end loader; [326 IAC 6-4]
  - (5) Unpaved plant roads and ground surface in work areas without public access, some with boiler slag as surface material; [326 IAC 6-4]

- (6) Unpaved roads and parking lots with public access; [326 IAC 6-4]
- (7) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment;
- (8) Natural gas pressure regulator vents, excluding venting at oil and gas production facilities; and
- (9) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted emission units operating at this source during this review process.

#### **Enforcement Issues**

There are no pending enforcement actions related to this source.

#### **Emission Calculations**

See Appendix A of this TSD for detailed emission calculations.

- (a) During this review, the emissions calculations were updated to reflect the source's most current "worst-case" operating conditions for all units, and includes emissions not previously counted. Additionally, since OAQ relies on the most up-to-date emission factors recommended by U.S. EPA, facility emissions have been characterized using the most recent version of U.S. EPA's AP-42 emission factors, where applicable.
  - (1) Potential criteria pollutant and hazardous air pollutant emissions from the natural gas-fired rotary dryer, boiler slag storage, and paved and unpaved roads, not previously accounted for in TV T029-7100-00014, have been calculated where applicable.
  - (2) PM2.5 emissions have been calculated for all applicable units in preparation for compliance with the May 8, 2008 promulgation of Prevention of Significant Deterioration (PSD) requirements for PM2.5 emissions.
  - (3) Potential process emissions from the boiler slag drying operation have been re-evaluated. Recent testing performed on an asphalt plant facility, having similar drying operations, has shown higher SO<sub>2</sub> emissions when slag is included in the aggregate mix than were previously accounted for in standard asphalt plant emission calculations. Consequently, IDEM determined that the emission factors developed during that testing should be applied to emissions from slag use at all asphalt plants, and that permit requirements and conditions should be revised and/or added, as needed, to account for any additional SO<sub>2</sub> emissions generated by the addition of slag to the aggregate mix. To date, no testing has been done for any of the slag drying/processing operations, as conducted by Gibbco, Inc., though they are very similar to the hot-mix asphalt aggregate drying operation.
    - (A) Based on laboratory analysis of a representative sample of the slag processed by Gibbco, Inc., conducted 01/21/2011, the worst case sulfur content of the boiler slag is 0.07%. Using worst case rationale, if slag containing 0.07% sulfur content were heated it could potentially release 100% of that sulfur in the form of SO<sub>2</sub>. Therefore, using a simple proportion, slag containing 0.07% sulfur (molecular weight 32.065) could potentially form and release 0.14% SO<sub>2</sub> (molecular weight 64.07). An emission factor (lbs/ton) was generated using this information, as follows:

0.14% is equivalent to 0.14 parts per 100, so  $0.14/100 = 0.0014$  lbs SO<sub>2</sub>/lb slag, and  $0.0014$  lbs of SO<sub>2</sub>/lb of slag \* 2000 lbs/1 ton = 2.80 lbs of SO<sub>2</sub>/ton of slag. The potential to emit SO<sub>2</sub> from the slag dryer was calculated using the 2.80 lbs/ton as an emission factor.

IDEM has determined that testing is not required to verify the SO<sub>2</sub> emission rate for the slag drying process because the use of the emission factor generated from the laboratory test results representing the release of 100% of the sulfur in the slag, in the form of SO<sub>2</sub>, provides a sufficiently conservative estimate of potential SO<sub>2</sub> emissions from this source.

- (B) Based on the MSDS received from the source, NO<sub>x</sub>, VOC, CO, and HAP emissions from the slag drying process are determined negligible.
- (b) Historic inspection reports and stack test summaries indicate that the plant was previously permitted at a maximum throughput capacity of thirty (30) or thirty-five (35) tons per hour of ash. However, the maximum throughput capacity has been demonstrated to be twenty-five (25) tons per hour. This adjusted throughput capacity was incorporated into the existing Title V permit, and has been carried over to this FESOP review.

**Permit Level Determination – FESOP**

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	tons/year	<u>NOTES</u>
PM	326.26	(1) Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
PM10 <sup>(1)</sup>	155.84	
PM2.5 <sup>(2)</sup>	155.84	
SO <sub>2</sub> <sup>(3)</sup>	306.33	
NO <sub>x</sub>	3.07	(2) US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions.
VOC	0.17	(3) Due to limited information available, the potential to emit SO <sub>2</sub> from the slag drying process will be verified through tests.
CO	2.58	
Total HAPs	0.058	(4) Appendix A.1 of this TSD reflects the uncontrolled, unlimited, potential emissions of the source.
"Worst Case" Single HAP	0.055 (hexane)	

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of PM10 and PM2.5 is greater than one hundred (100) tons per year, each. The PTE of all other regulated criteria pollutants are less than one hundred (100) tons per year. The source would have been subject to the provisions of 326 IAC 2-7. However, the source will be issued a Federally Enforceable State Operating Permit (FESOP) (326 IAC 2-8), because the source will limit emissions to less than the Title V major source threshold levels.
- (b) The potential to emit (PTE) (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

**PTE of the Entire Source After Issuance of the FESOP**

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

Process/ Emission Unit	Potential To Emit of the Entire Source after Issuance of FESOP (tons/year)								
	PM	*PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Single HAP
<b>Ducted Emissions</b>									
Slag Dryer Fuel Combustion	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.058	0.055 (hexane)
Slag Dryer (Process) <sup>αβ</sup>	105.65 <sup>(1)(3)</sup>	50.41 <sup>(2)(3)</sup>	50.41 <sup>(2)(3)</sup>	99.31 <sup>(2)</sup>	negl.	negl.	negl.	negl.	negl.
Slag Drying, Crushing, and Screening <sup>α</sup>				0	0	0	0	0	0
Slag Conveying	0.11	0.04	0.04	0	0	0	0	0	0
<b>Total Process Emissions</b>	<b>105.81</b>	<b>50.68</b>	<b>50.61</b>	<b>99.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055 (hexane)</b>
<b>Fugitive Emissions</b>									
Material Processing and Handling	0.12	0.06	0.01	0	0	0	0	0	0
Material Storage Piles	0.63	0.22	0.22	0	0	0	0	0	0
Unpaved and Paved Roads (worst case) <sup>(3)</sup>	2.06	0.53	0.05	0	0	0	0	0	0
Volatile Organic Liquid Storage Vessels <sup>(4)</sup>	0	0	0	0	0	negl.	0	negl.	negl.
<b>Total Fugitive Emissions</b>	<b>2.82</b>	<b>0.81</b>	<b>0.28</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>**Total Limited/ Controlled Emissions</b>	<b>105.81</b>	<b>50.68</b>	<b>50.68</b>	<b>99.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055 (hexane)</b>
Title V Major Source Thresholds	N/A	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	N/A	250	250	250	250	N/A	N/A
Emission Offset/ Nonattainment NSR Major Source Thresholds	N/A	N/A	100	N/A	N/A	N/A	N/A	N/A	N/A
negl. = negligible N/A = Not applicable * Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant". Additionally, US EPA has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. ** As noted in the "Fugitive Emissions" Section of this TSD, page 3 of 13, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability. α The slag drying, crushing, and screening, operations share a common control device (wet scrubber). Therefore, particulate emissions (PM/PM10/PM2.5) are based on what is received by the wet scrubber, whereas SO2 emissions are strictly from the slag drying process and are measured from the dryer stack exhaust. β Based on the MSDS submitted by the source, NOx, VOC, CO, and HAP emissions from the slag drying process are determined negligible. (1) Limited PTE based upon pound per hour emission limitation to comply with 326 IAC 2-2 (PSD) (2) Limited PTE based upon pound per hour emission limitation to comply with 326 IAC 2-8 (FESOP). (3) PTE after controls (4) Fugitive emissions from the volatile organic liquid storage tanks were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.									

(a) **FESOP Status**  
 This existing source is not a Title V major stationary source, because the potential to emit criteria pollutants from the entire source will be limited to less than the Title V major source threshold levels. In addition, this existing source is not a major source of HAPs, as defined in 40 CFR 63.41, because the potential to emit HAPs is less than ten (10) tons per year for a single HAP and twenty-five (25) tons per year of total HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act and is subject to the provisions of 326 IAC 2-8 (FESOP).

In order to comply with the requirements of 326 IAC 2-8-4 (FESOP), the source shall comply with the following:

- (a) The maximum amount of boiler slag processed through the rotary dryer shall not exceed 71,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. *(This is a new requirement for this source)*
- (b) PM10 emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed one and forty-two hundredths (1.42) pounds of PM per ton of slag processed. *(This is a new requirement for this source)*
- (c) PM2.5 emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed one and forty-two hundredths (1.42) pounds of PM per ton of slag processed. *(This is a new requirement for this source)*
- (d) SO2 emissions from the seven (7.0) MMBtu/hr natural gas-fired rotary dryer stack exhaust shall not exceed two and eighty hundredths (2.80) pounds of SO2 per ton of slag processed. *(This is a new requirement for this source)*

Compliance with these limits, combined with the potential to emit PM10, PM2.5, and SO2 from all other emission units at this source, shall limit the source-wide total potential to emit of PM10, PM2.5, and SO2 to less than one hundred (100) tons per twelve (12) consecutive month period, each, and shall render 326 IAC 2-7 (Part 70 Permits), 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), 326 IAC 2-3 (Emission Offset), and 326 IAC 2-1.1-5 (Nonattainment New Source Review), not applicable.

(b) PSD Minor Source

This existing source is not a major stationary source, under PSD (326 IAC 2-2), because the potential to emit PM is limited to less than two hundred fifty (250) tons per year and the potential to emit all other attainment regulated pollutants are less than two hundred fifty (250) tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the source shall comply with the following:

- (a) The maximum amount of boiler slag processed through the rotary dryer shall not exceed 71,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. *(This is a new requirement for this source)*
- (b) PM emissions from the wet scrubber, serving the drying, crushing, screening, conveying, and storage operations, stack exhaust shall not exceed two and ninety-eight hundredths (2.98) pounds of PM per ton of slag processed. *(This is a new requirement for this source)*

Compliance with these limits, combined with the potential to emit PM from all other emission units at this source, shall limit the source-wide total potential to emit of PM to less than two hundred fifty (250) tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) Nonattainment New Source Review

This existing source is not a major stationary source, under 326 IAC 2-1.1-5 (Nonattainment New Source Review), because the potential to emit particulate matter with a diameter less than two and five tenths (2.5) micrometers (PM2.5), is limited to less than one hundred (100) tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply.

### Federal Rule Applicability Determination

#### *New Source Performance Standards (NSPS)*

- (a) 40 CFR 60, Subpart Dc - Standards for Small Industrial/Commercial/Institutional Steam Generating Units  
The requirements of the New Source Performance Standard for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc (326 IAC 12), are not included in the permit because the seven (7.0) million British thermal units (mmBtu/hr) natural gas-fired rotary dryer has a maximum design heat input capacity of less than the applicability threshold of ten (10) mmBtu/hr per hour.
- (b) 40 CFR 60, Subpart Kb - Standards for Volatile Organic Liquid Storage Vessels  
The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels, 40 CFR 60 Subpart Kb (326 IAC 12), are not included in the permit because the natural gas storage has a maximum capacity less than 75 m<sup>3</sup> (19,813 gallons). Therefore, pursuant to 40 CFR 60.110b(a), the natural gas storage is exempt from this rule.
- (c) 40 CFR 60, Subpart OOO - Standards for Nonmetallic Mineral Processing Plants  
The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO (3O) (326 IAC 12), are not included in the permit because the material (i.e., boiler slag) being processed in the natural gas-fired rotary dryer does not meet the definition of a nonmetallic mineral, as defined in §60.671 - Definitions.
- (d) 40 CFR 60, Subpart UUU - Standards for Calciners and Dryers in Mineral Industries  
The requirements of the New Source Performance Standard for Calciners and Dryers in Mineral Industries, 40 CFR 60, Subpart UUU (3U) (326 IAC 12), are not included in the permit because the dryer used at this stationary wet-bottom boiler slag processing plant was initially constructed prior to the rule applicability date of April 28, 1986, and because the 1996 conversion of the rotary dryer burner from No. 2 fuel oil to natural gas does not meet the definition of modification under 40 CFR 60.1, since the change did not result in the increase of emissions of any air pollutant with an applicable standard proposed or promulgated under 40 CFR 60 into the atmosphere.
- (e) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) included in the permit.

#### *National Emission Standards for Hazardous Air Pollutants (NESHAP)*

- (a) 40 CFR 63, Subpart DDDDD - NESHAPs for Industrial, Commercial, and Institutional Boilers, and Process Heaters  
The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR 63, Subpart DDDDD (5D) (326 IAC 20), are not included in the permit, as follows:  
  
On June 8, 2007, the United States Court of Appeals for the District of Columbia Circuit (in *National Resource Defense Council, Sierra Club, Environmental Integrity Project vs. EPA*, No. 04-1385), vacated 40 CFR 63, Subpart DDDDD in its entirety. Additionally, since State Rule 326 IAC 20-95 incorporated the requirements of the NESHAP 40 CFR 63, Subpart DDDDD by reference, the requirements of 326 IAC 20-95 are no longer effective. However, since NESHAP 40 CFR Part 63, Subpart DDDDD has been vacated, Section 112(j) of the Clean Air Act, major sources of Hazardous Air Pollutants (HAPs), in specified source categories, requires a case-by-case MACT determination when EPA fails to promulgate a scheduled MACT Standard by the regulatory deadline. Federal Mogul Corporation, Inc. is still considered an area source under Section 112 of the Clean Air Act, MACT Standards. Therefore, the source is not subject to a case-by-case MACT determination.
- (b) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in the permit.

*Compliance Assurance Monitoring (CAM)*

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.

<b>State Rule Applicability Determination</b>
---

*Entire Source*

- (a) 326 IAC 2-1.1-5 (Nonattainment New Source Review)  
Nonattainment New Source Review applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration (PSD))  
PSD applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (c) 326 IAC 2-3 (Emission Offset)  
Dearborn County has been classified as attainment or unclassifiable in Indiana for all criteria pollutants. Additionally, this existing stationary source is still not considered a major source because the potential emissions for all criteria pollutants are less than the Title V Thresholds. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply to this source, and the requirements are not included in the permit.
- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))  
This source is still not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the entire source is still 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.
- (e) 326 IAC 2-6 (Emission Reporting)  
This source has accepted federally enforceable limits and will no longer be required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than five (5) tons per year. Therefore, pursuant to 326 IAC 2-6-1(b), the source is only subject to additional information requests as provided in 326 IAC 2-6-5.  
  
Note: The following terms and conditions from previous approvals have been revised in this FESOP:  
  
This source was previously subject to 326 IAC 2-6 (Emission Reporting), because it had a potential to emit more than one-hundred (100) tons per year of SO<sub>2</sub>, NO<sub>x</sub>, CO, PM-10, and VOC. Pursuant to the rule, the owner/operator of the source was required to submit an annual emission statement for the source by July 1 of each year, covering the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year), and containing the minimum requirement as specified in 326 IAC 2-6-4.
- (f) 326 IAC 2-8-4 (FESOP)  
FESOP applicability is discussed under the PTE of the Entire Source after Issuance of the FESOP section above.
- (g) 326 IAC 4-2-2 (Incinerators)  
The seven (7.0) mmBtu/hr natural gas-fired rotary dryer is not an incinerator, as defined by 326 IAC 1-2-34, since it does not burn waste substances. Therefore, 326 IAC 4-2-2 does not apply to the natural gas-fired rotary dryer, and the requirements are not included in the permit.

- (h) 326 IAC 5-1 (Opacity Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) 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.
- (i) 326 IAC 6-2 (Particulate Emissions from Indirect Heating Units)  
The seven (7.0) mmBtu/hr natural gas-fired rotary dryer does not meet the definition of an indirect heating unit, as defined in 236 IAC 1-2-19. Therefore, 326 IAC 6-2 still does not apply to the natural gas-fired rotary dryer, and the requirements are not included in the permit.
- (j) 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)
- (1) The slag drying, screening, crushing, conveying, and storage operations, are each otherwise subject 326 IAC 6.5 (Nonattainment Area PM Limitations). Therefore, pursuant to 326 IAC 6-3-1(c)(3), each of these units are exempt from the requirements of 326 IAC 6-3, because they are subject to the more stringent particulate limit established in 326 IAC 6.5.
  - (2) The slag processing and handling, temporary slag storage piles, and the unpaved roads, each have the potential to emit fugitive particulate emissions and are otherwise regulated by 326 IAC 6-4.
- (k) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)  
The slag processing and handling, temporary slag storage piles, and the unpaved roads, each, have the potential to emit fugitive particulate emissions; therefore, this existing source continues to be subject to the requirements of 326 IAC 6-4. Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the existing source 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.
- Note: The following terms and conditions from previous approvals have been revised in this FESOP:
- Previously, selected sections of 326 IAC 6-4 were included in the Section D.2 of the permit. Since Gibbco, Inc. does not have an ash pond, any existing ash ponds belong to the American Electric Power (AEP) Tanners Creek electric utility generating station, the fugitive dust emission limitations for ash ponds, Condition D.2.1, have been removed from the permit. Additionally, IDEM has determined that the requirements of 326 IAC 6-4 contained in Section C of the permit are sufficient to regulate fugitive dust emissions from the unpaved roadways. Therefore, the remainder of Section D.2 has been removed from the permit.
- (l) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)  
This stationary source is still not subject to the requirements of 326 IAC 6-5, since the source is not located in a nonattainment area as defined in 326 IAC 6-5-1(a), and obtained all necessary approvals before December 13, 1985.
- (m) 326 IAC 6.5 (Particulate Matter Limitations except Lake County)  
This stationary source is still subject to the requirements of 326 IAC 6.5-1-2 because it is located in Dearborn County and still has a potential to emit PM before controls of greater than one hundred (100) tons per year. Therefore, pursuant to 6.5-1-2(a), PM emissions from the slag drying, screening, crushing, conveying, and storage operations, each, shall not exceed seven-hundredths (0.07) gram

per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)), each.

In order to comply with the requirements of 326 IAC 6.5-1-2, particulate emissions from the slag drying, crushing, screening, conveying, and storage operations shall be controlled by the respective control device(s), i.e., the wet scrubber, at all times that any of the slag drying, crushing, screening, conveying, and storage operations are in operation.

- (n) 326 IAC 7-1.1 (Sulfur Dioxide Emissions Limitations)  
The potential to emit SO<sub>2</sub> from fuel combustion in the seven (7.0) mmBtu/hr natural gas-fired rotary dryer are less than twenty-five (25) tons per year and ten (10) pounds per hour respectively. Therefore, 326 IAC 7-1.1-2 does not apply to the natural gas-fired rotary dryer and the requirements are not included in the permit.
- (o) 326 IAC 9-1 (Carbon Monoxide Emission Limits)  
This existing stationary wet-bottom boiler slag processing plant is still not one of the source types listed 326 IAC 9-1-2. Therefore, the requirements of 326 IAC 9-1 are not included in the permit.
- (p) 326 IAC 10-3 (Nitrogen Oxide Reduction Program for Specific Source Category)  
The existing seven (7.0) mmBtu/hr natural gas-fired rotary dryer still does not meet the definition of an affected facility, as defined in 326 IAC 10-3-1(a), because it still has a maximum a heat input of less than two hundred fifty million (250,000,000) British thermal units per hour (mmBtu); therefore, the natural gas-fired rotary dryer is still not subject to this rule and the requirements are not included in the permit.
- (q) 326 IAC 12 (New Source Performance Standards)  
See Federal Rule Applicability Section of this TSD.
- (r) 326 IAC 20 (Hazardous Air Pollutants)  
See Federal Rule Applicability Section of this TSD.

### **Compliance Determination, Monitoring and Testing Requirements**

#### *Compliance Determination Requirements*

The existing slag drying, crushing, screening, conveying, and storage operations have applicable compliance determination requirements as specified below:

- (1) In order to comply with the PM, PM<sub>10</sub>, and PM<sub>2.5</sub> limitations in the permit, the following apply:
  - (A) The wet scrubber and accompanying dust pickups for the slag drying, crushing, screening, conveying, and storage operations shall continue to be in operation and control emissions from the slag drying, crushing, screening, conveying, and storage operations at all times that any of the slag drying, crushing, screening, conveying, and storage operations are in operation. *(This is an existing requirement for this source)*

Note: The following terms and conditions from previous approvals have been revised in this FESOP:

Previously, the source was required to apply oil at any/all of the truck loading operations at all times material transference occurred, specifically to control particulate emissions from the truck loading and the railcar loading operations. While this activity is no longer specifically regulated in the D Section of the permit, the requirements of 326 IAC 6-4 are contained in Section C of the permit and require the source to contain/control fugitive emissions at their discretion.

*Testing Requirements*

The existing slag drying, crushing, screening, conveying, and storage operations has applicable testing requirements as specified below:

Testing Requirements				
Emission Unit	Control Device	Pollutant	Timeframe for Testing	Frequency of Testing
The slag drying, crushing, screening, conveying, and storage operations.	Wet scrubber	PM	No later than five (5) yrs from the last valid test*	Once every five (5) years
		PM10 & PM2.5	No later than 180 days after issuance of this FESOP or no later than five (5) yrs from the last valid compliance demonstration, whichever is later.	Once every five (5) years

\* The last valid stack test occurred on September 10, 2010. The source was in compliance at that time.

Note: The following terms and conditions from previous approvals have been revised in this FESOP:

- (i) Previously, in response to opacity readings noted by OAQ Compliance staff, and in the absence of parametric monitoring for the scrubber, the stack testing frequency was set to once every two (2) years. Gibbco, Inc. has installed control device monitoring equipment, and has agreed to monitor and maintain the control device according to standard FESOP requirements; therefore, standard testing requirements were determined adequate to ensure compliance with the FESOP limits in the permit.

*Compliance Monitoring Requirements*

- (a) The existing wet scrubber stack exhaust, and slag dryer, crushing, screening, conveying, material transfer points, and hoppers and storage bins, continue to have applicable compliance monitoring conditions as specified below:

Emission Unit & Control Device	Parameter	Frequency	Range	Excursions and Exceedances
Wet Scrubber stack exhaust and each of the accompanying dust pickups	Visible Emissions	Once per day	normal/abnormal	Response Steps
Wet Scrubber	Pressure Drop	Once per day	2.0 to 8.0 inches	Response Steps
	Bags in baghouse	As needed	normal/abnormal	Response Steps
Dryer, crusher, screens, conveyors, material transfer points, hoppers, and storage bins.	Visible Emissions	Once per day	normal/abnormal	Response Steps

These monitoring conditions are necessary because the wet scrubber and dust pickups used in conjunction with the slag dryer, screens, crusher, conveyors, material transfer points, hoppers, and storage bins, must operate properly to ensure continued compliance with 326 IAC 2-8 (FESOP), and 326 IAC 6.5 (Particulate Matter Limitations Except Lake County), and the limits that render 326 IAC 2-2 (PSD) and 326 IAC 2-7 (Part 70 Permit Program) not applicable.

*Intentionally left blank..... continued on next page.....*

Note: The following terms and conditions from previous approvals have been revised in this FESOP:  
Gibbco, Inc. has installed control device monitoring equipment, and has agreed to monitor and maintain the control device (wet scrubber) according to standard FESOP requirements, which were determined adequate to ensure compliance with the FESOP limits in the permit.

### 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 June 24, 2010.

The operation of this source shall be subject to the conditions of the attached proposed FESOP No.: 029-29391-00014. The staff recommends to the Commissioner that this FESOP be approved.

### IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ms. Hannah Desrosiers 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) 234-5374 or toll free at 1-800-451-6027 extension 4-5374.
- (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.in.gov/idem](http://www.in.gov/idem)

**Appendix A.1: Unlimited Emissions Calculations  
Entire Source**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

**Boiler Slag Processing Plant Maximum Capacity**

Maximum Hourly Boiler Slag Processing Rate =	25	ton/hr	
Maximum Annual Boiler Slag Processing Rate =	219,000	ton/yr	0.07 % sulfur
Maximum Dryer Fuel Input Rate =	7.0	MMBtu/hr	
Natural Gas Usage =	61.3	MMCF/yr	

**Unlimited/Uncontrolled Emissions**

Process Description	Unlimited/Uncontrolled Potential to Emit (tons/year)									
	Criteria Pollutants							Hazardous Air Pollutants		
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAP	
<b>Ducted/Ductable Emissions</b>										
Slag Dryer Fuel Combustion (worst case)	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.058	0.055 (hexane)	
Slag Drying (Process)				306.31	negl.	negl.	negl.	negl.	negl.	
Slag Drying, Crushing, Screening, and Conveying*	325.87	155.49	155.49	0	0	0	0	0	0	
Slag Conveying (to railcar loading apparatus)	0.33	0.12	0.12	0	0	0	0	0	0	
<b>Total Ducted/Ductable Emissions</b>	<b>326.26</b>	<b>155.84</b>	<b>155.84</b>	<b>306.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055 (hexane)</b>	
<b>Fugitive Emissions</b>										
Material Processing and Handling	0.38	0.18	0.03	0	0	0	0	0	0	
Material Storage Piles	0.63	0.22	0.22	0	0	0	0	0	0	
Unpaved Roads	12.72	3.24	0.32	0	0	0	0	0	0	
Volatile Organic Liquid Storage Vessels**	0	0	0	0	0	negl.	0	negl.	negl.	
<b>Total Fugitive Emissions</b>	<b>13.73</b>	<b>3.64</b>	<b>0.57</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
<b>Totals Unlimited/Uncontrolled PTE</b>	<b>326.26</b>	<b>155.84</b>	<b>155.84</b>	<b>306.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055 (hexane)</b>	

**Methodology**

negl. = Negligible.

\* The slag drying, crushing, screening, and conveying operations share a common control device (wet scrubber). Therefore, particulate emissions (PM/PM10/PM2.5) are based on what is received by the wet scrubber, whereas SO2 emissions are strictly from the slag drying process and are measured from the dryer stack exhaust.

Based on the MSDS submitted by the source, NOx, VOC, CO, and HAP emissions from the slag drying process are determined negligible.

\*\* Fugitive emissions from the volatile organic liquid storage tanks\*\* were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.

Unlimited Ducted/Ductable Emissions (tons/yr) = SUM (Unlimited Emissions from Slag Dryer Fuel Combustion + Dryer Slag Processing + (Unlimited Emissions from Material Crushing, Screening, and Conveying))

Unlimited Fugitive Emissions (tons/yr) = SUM((Unlimited Emissions from Material Processing and Handling + (Unlimited Emissions from Material Storage Piles + (Unlimited Emissions from Unpaved Roads)

Totals Unlimited/Uncontrolled Emissions (tons/yr) = SUM(Unlimited/Uncontrolled Ducted/Ductable Emissions (tons/yr))

Note: 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.

**Appendix A.1: Unlimited Emissions Calculations**  
**Slag Dryer Fuel Combustion with Maximum Capacity < 100 MMBtu/hr**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

The following calculations determine the unlimited/uncontrolled emissions created from the combustion of natural gas, fuel oil, propane, butane, or used/waste oil in the dryer/mixer at the source.

**Maximum Capacity**

Maximum Hourly Boiler Slag Processing Rate =	25	ton/hr
Maximum Annual Boiler Slag Processing Rate =	219,000	ton/yr
Maximum Fuel Input Rate =	7.0	MMBtu/hr
Natural Gas Usage =	61.3	MMCF/yr

**Unlimited/Uncontrolled Emissions**

Criteria Pollutant	Emission Factor (units)	Unlimited/Uncontrolled Potential to Emit (tons/yr)	Total (tons/yr)
	Natural Gas (lb/MMCF)	Natural Gas (tons/yr)	
PM	1.9	0.058	0.06
PM10/PM2.5	7.6	0.233	0.23
SO <sub>2</sub>	0.6	0.018	0.02
NO <sub>x</sub>	100	3.066	3.07
VOC	5.5	0.169	0.17
CO	84	2.575	2.58
<b>Hazardous Air Pollutant</b>			
HCl			0
Antimony			0
Arsenic	2.0E-04	6.1E-06	6.1E-06
Beryllium	1.2E-05	3.7E-07	3.7E-07
Cadmium	1.1E-03	3.4E-05	3.4E-05
Chromium	1.4E-03	4.3E-05	4.3E-05
Cobalt	8.4E-05	2.6E-06	2.6E-06
Lead	5.0E-04	1.5E-05	1.5E-05
Manganese	3.8E-04	1.2E-05	1.2E-05
Mercury	2.6E-04	8.0E-06	8.0E-06
Nickel	2.1E-03	6.4E-05	6.4E-05
Selenium	2.4E-05	7.4E-07	7.4E-07
1,1,1-Trichloroethane			0
1,3-Butadiene			0
Acetaldehyde			0
Acrolein			0
Benzene	2.1E-03	6.4E-05	6.4E-05
Bis(2-ethylhexyl)phthalate			0
Dichlorobenzene	1.2E-03	3.7E-05	3.7E-05
Ethylbenzene			0
Formaldehyde	7.5E-02	2.3E-03	2.3E-03
Hexane	1.8E+00	0.06	0.055
Phenol			0
Toluene	3.4E-03	1.0E-04	1.0E-04
Total PAH Haps	negl	negl	0
Polycyclic Organic Matter			0
Xylene			0
<b>Total HAPs</b>			<b>0.06</b>

**Methodology**

Natural Gas Usage (MMCF/yr) = [Maximum Fuel Input Rate (MMBtu/hr)] \* [8,760 hrs/yr] \* [1 MMCF/1,000 MMBtu]

Unlimited/Uncontrolled Potential to Emit (tons/yr) = [Maximum Natural Gas Usage (MMCF/yr)] \* [Emission Factor (lb/MMCF)] \* [ton/2000 lbs]

Sources of AP-42 Emission Factors for fuel combustion:

Natural Gas : AP-42 Chapter 1.4 (dated 7/98), Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4

**Abbreviations**

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PM2.5 = Particulate Matter (< 2.5 um)

SO<sub>2</sub> = Sulfur Dioxide

NO<sub>x</sub> = Nitrous Oxides

VOC - Volatile Organic Compounds

CO = Carbon Monoxide

HAP = Hazardous Air Pollutant

HCl = Hydrogen Chloride

PAH = Polyaromatic Hydrocarbon

### Appendix A.1: Unlimited Emissions Calculations Slag Dryer SO2 Emissions

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive,  
 Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

The following calculations determine the unlimited/uncontrolled emissions from the slag drying process.

Maximum Hourly Boiler Slag Processing Rate = 25 ton/hr  
 Maximum Annual Boiler Slag Processing Rate = 219,000 ton/yr  
0.07 % sulfur

Criteria Pollutant	Uncontrolled Emission Factors (lb/ton)	Unlimited/Uncontrolled Potential to Emit (tons/yr)
SO2*	2.80	306.31

**Methodology**

Unlimited/Uncontrolled Potential to Emit (tons/yr) = (Maximum Annual Boiler Slag Processing Rate (tons/yr)) \* (Emission Factor (lb/ton)) \* (ton/2000 lbs)

\* Based on a lab analysis of a representative sample of the slag processed by Gibbco, Inc., conducted 01/21/2011, the worst case sulfur content of the boiler slag is 0.07%.

Using worst case rationale, if slag containing 0.07% sulfur content were heated it could potentially release 100% of that sulfur in the form of SO2.

Therefore, using a simple proportion, slag containing 0.07% sulfur (molecular weight 32.065) could potentially form and release 0.14% SO2 (molecular weight 64.07).

An emission factor (lbs/ton) was generated using this information, as follows: 0.14% is equivalent to 0.14 parts per 100, so 0.14/100 = 0.0014 lbs SO2 /lb slag, and 0.0014 lbs of SO2/lb of slag \* 2000 lbs/1ton = 2.80 lbs of SO2/ton of slag.

**Abbreviations**

SO2 = Sulfur Dioxide

### Appendix A.1: Unlimited Emissions Calculations Slag Processing, Handling, Drying, Crushing, Screening, and Conveying

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

#### 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.

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

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	10.2	= worst case annual mean wind speed (Source: NOAA, 2006*)
M	8.0	= material % moisture content of aggregate**
$E_f$ (PM)	8.59E-04	lb PM/ton of material handled
$E_f$ (PM10)	4.06E-04	lb PM10/ton of material handled
$E_f$ (PM2.5)	6.15E-05	lb PM2.5/ton of material handled

Maximum Material Handling Throughput = 219,000 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 raw materials into temporary storage piles	9.41E-02	4.45E-02	6.74E-03
Front-end loader dumping of materials into raw material feeder hoppers	9.41E-02	4.45E-02	6.74E-03
Truck Loading from finished product storage hoppers	9.41E-02	4.45E-02	6.74E-03
Railcar Loading from conveyor	9.41E-02	4.45E-02	6.74E-03
<b>Total (tons/yr)</b>	<b>0.38</b>	<b>0.18</b>	<b>0.03</b>

#### Methodology

The percent asphalt cement/binder provided by the source.

Maximum Material Handling Throughput (tons/yr) = [Annual Boiler Slag Processing Rate Limitation (tons/yr)] \* [1 - Percent Asphalt Cement/Binder (weight %)]

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

Raw materials may include limestone, sand, recycled asphalt pavement (RAP), gravel, slag, and other additives

\*Worst case annual mean wind speed (Indianapolis, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2006

\*\* Moisture Content of Boiler Slag from: <http://www.tfrc.gov/hnr20/recycle/waste/cbabs1.htm>, Table 4-4: Typical mechanical properties of bottom ash and boiler slag, Lovell, C. W., T.-C. Ke, W.-H. Huang, and J. E. Lovell. "Bottom Ash As Highway Material," Presented at the 70th Annual Meeting of the Transportation Research Board, Washington, D.C., January, 1991.

#### Slag Drying, Crushing, Screening, and Conveying Operations

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)***
Slag Drying, Crushing, Screening, and Conveying *	2.976	1.42	325.87	155.49
Conveyor transfer to railcar loading apparatus****	0.003	0.0011	0.33	0.12
<b>Unlimited Potential to Emit (tons/yr) =</b>			<b>326.20</b>	<b>155.61</b>

#### Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Boiler Slag Processing Rate Limitation (tons/yr)]

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

Raw materials include boiler slag.

\* The slag drying, crushing, screening, and conveying operations are all controlled by a single wet scrubber. 2001 stack test data was used to calculate the PM Emission factor, as follows:

3.72 lb PM/hr @ 25 tons/hr throughput = 0.1488 lb PM/ton AFTER the control.

Assuming a 95% control efficiency for the wet scrubber, the PM emission factor BEFORE the control is 2.976 lb PM/ton.

\*\*Using estimation from AP-42 11.19.2, PM10 = PM emission factor/2.1 = 1.42 lb PM10/ton

\*\*\*Assumes PM2.5 emissions are equal to PM10 emissions.

\*\*\*\*Emission Factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04), Table 11.19.2-2, are utilized.

#### Abbreviations

PM = Particulate Matter  
 PM10 = Particulate Matter (<10 um)

PM2.5 = Particulate matter (< 2.5 um)  
 PTE = Potential to Emit

**Appendix A.1: Unlimited Emissions Calculations  
Material Storage Piles**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

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.

$E_f = 1.7 * (s/1.5) * (365-p) / 235 * (f/15)$ <p>where <math>E_f</math> = emission factor (lb/acre/day)  <math>s</math> = silt content (wt %)  <math>p</math> = 125 days of rain greater than or equal to 0.01 inches  <math>f</math> = 15 % of wind greater than or equal to 12 mph</p>
---

Material	Silt Content (wt %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)
Boiler Slag	4.0	4.63	0.75	0.634	0.222
<b>Totals</b>				<b>0.63</b>	<b>0.22</b>

**Methodology**

PTE of PM (tons/yr) = (Emission Factor (lb/acre/day)) \* (Maximum Pile Size (acres)) \* (ton/2000 lbs) \* (8760 hours/yr)  
 PTE of PM10/PM2.5 (tons/yr) = (Potential PM Emissions (tons/yr)) \* 35%  
 \*Silt content values obtained from AP-42 Table 13.2.4-1 (dated 1/95)  
 \*\*Maximum anticipated pile size (acres) provided by the source.  
 PM2.5 = PM10

**Abbreviations**

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

**Appendix A.1: Unlimited Emissions Calculations  
Unpaved Roads**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

**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).

Maximum Material Handling Throughput =  tons/yr  
 Natural Gas Usage =  MMCF/yr

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Aggregate (Slag) Truck Enter Full	Dump truck (16 CY)	15.0	26.0	41	8.4E+03	3.5E+05	520	0.098	829.5
Aggregate (Slag) Truck Leave Empty	Dump truck (16 CY)	15.0	0	15.0	8.4E+03	1.3E+05	520	0.098	829.5
Aggregate (Slag) Loader Full	Front-end loader (3 CY)	15.0	4.2	19.2	5.2E+04	1.0E+06	250	0.047	2,468.9
Aggregate (Slag) Loader Empty	Front-end loader (3 CY)	15.0	0	15.0	5.2E+04	7.8E+05	250	0.047	2,468.9
Fuel (NG) Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.00	6.5E-03	2.8E-01	520	0.098	6.4E-04
Fuel (NG) Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.00	6.5E-03	7.8E-02	520	0.098	6.4E-04
<b>Total</b>					<b>1.2E+05</b>	<b>2.3E+06</b>			<b>6.6E+03</b>

Average Vehicle Weight Per Trip =  tons/trip  
 Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = K \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	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	0.9	= constant (AP-42 Table 13.2.2-2)
W =	18.6	18.6	18.6	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E \cdot [(365 - P)/365]$   
 where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	5.87	1.50	0.15	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	3.86	0.98	0.10	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Aggregate (Slag) Truck Enter Full	Dump truck (16 CY)	2.43	0.62	0.06	1.60	0.41	0.04	0.80	0.20	0.02
Aggregate (Slag) Truck Leave Empty	Dump truck (16 CY)	2.43	0.62	0.06	1.60	0.41	0.04	0.80	0.20	0.02
Aggregate (Slag) Loader Full	Front-end loader (3 CY)	7.24	1.85	0.18	4.76	1.21	0.12	2.38	0.61	0.06
Aggregate (Slag) Loader Empty	Front-end loader (3 CY)	7.24	1.85	0.18	4.76	1.21	0.12	2.38	0.61	0.06
Fuel (NG) Truck Enter Full	Tanker truck (6000 gal)	1.87E-06	4.77E-07	4.77E-08	1.23E-06	3.14E-07	3.14E-08	6.15E-07	1.57E-07	1.57E-08
Fuel (NG) Truck Leave Empty	Tanker truck (6000 gal)	1.87E-06	4.77E-07	4.77E-08	1.23E-06	3.14E-07	3.14E-08	6.15E-07	1.57E-07	1.57E-08
<b>Totals</b>		<b>19.35</b>	<b>4.93</b>	<b>0.49</b>	<b>12.72</b>	<b>3.24</b>	<b>0.32</b>	<b>6.36</b>	<b>1.62</b>	<b>0.16</b>

**Methodology**

Maximum Material Handling Throughput = [Annual Boiler Slag Processing Rate Limitation (tons/yr)] \* [1 - Percent Asphalt Cement/Binder (weight %)]  
 Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]  
 Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]  
 Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] \* [Maximum trips per year (trip/yr)]  
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
 Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] \* [Maximum one-way distance (mi/trip)]  
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]  
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]  
 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)  
 PM2.5 = PM10

**Abbreviations**

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

## Appendix A.2: Limited Emissions Calculations Entire Source

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

### Boiler Slag Processing Plant Limitations

Maximum Hourly Boiler Slag Processing Rate =	25	ton/hr	
Annual Boiler Slag Processing Rate Limitation =	71,000	ton/yr	0.07 % sulfur
Natural Gas Limitation =	61.3	MMCF/yr	
PM Slag Dryer Limitation =	2.98	lb/ton	
PM10 Slag Dryer Limitation =	1.42	lb/ton	
SO2 Slag Dryer Limitation =	1.42	lb/ton	
PM2.5 Slag Dryer Limitation =	2.80	lb/ton	

### Limited/Controlled Emissions

Process Description	Limited/Controlled Potential Emissions (tons/year)									
	Criteria Pollutants							Hazardous Air Pollutants		
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	Total HAPs	Worst Case HAP	
<b>Ducted/Ductable Emissions</b>										
Slag Dryer Fuel Combustion	0.06	0.23	0.23	0.02	3.07	0.17	2.58	0.058	0.055	(hexane)
Slag Drying (Process)				99.31	negl.	negl.	negl.	negl.	negl.	
Slag Drying, Crushing, Screening, and Conveying*	105.65	50.41	50.41	0	0	0	0	0	0	
Slag Conveying (to railcar loading apparatus)	0.11	0.04	0.04	0	0	0	0	0	0	
<b>Limited Ducted/Ductable Emissions</b>	<b>105.81</b>	<b>50.68</b>	<b>50.68</b>	<b>99.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055</b>	(hexane)
<b>Fugitive Emissions</b>										
Material Processing and Handling	0.12	0.06	0.01	0	0	0	0	0	0	
Material Storage Piles	0.63	0.22	0.22	0	0	0	0	0	0	
Unpaved and Paved Roads (worst case)	2.06	0.53	0.05	0	0	0	0	0	0	
Volatile Organic Liquid Storage Vessels**	0	0	0	0	0	negl.	0	negl.	negl.	
<b>Limited Fugitive Emissions</b>	<b>2.82</b>	<b>0.81</b>	<b>0.28</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	
<b>Totals Limited/Controlled Emissions</b>	<b>105.81</b>	<b>50.68</b>	<b>50.68</b>	<b>99.33</b>	<b>3.07</b>	<b>0.17</b>	<b>2.58</b>	<b>0.058</b>	<b>0.055</b>	(hexane)

#### Methodology

negl. = Negligible.

\* The slag drying, crushing, screening, and conveying operations share a common control device (wet scrubber). Therefore, particulate emissions (PM/PM10/PM2.5) are based on what is received by the wet scrubber, whereas SO2 emissions are strictly from the slag drying process and are measured from the dryer stack exhaust.

Based on the MSDS submitted by the source, NOx, VOC, CO, and HAP emissions from the slag drying process are determined negligible.

\*\* Fugitive emissions from the volatile organic liquid storage tanks were calculated using the EPA Tanks 4.0.9d program and were determined to be negligible.

Limited Ducted/Ductable Emissions (tons/yr) = SUM (Emissions from Slag Dryer Fuel Combustion + Dryer Slag Processing + Emissions from Material Crushing, Screening, and Conveying)

Limited Fugitive Emissions (tons/yr) = SUM(Emissions from Material Processing and Handling + Emissions from Material Storage Piles + Emissions from Unpaved Roads)

Totals Limited/Controlled Emissions (tons/yr) = SUM(Limited Ducted Emissions (tons/yr)

Note: 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.

**Appendix A.2: Limited Emissions Calculations**  
**Slag Dryer Fuel Combustion with Maximum Capacity < 100 MMBtu/hr**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

Note: The following calculations determine the limited emissions created from the combustion of natural gas in the slag dryer. Since the fuel combustion emissions from the slag dryer are minimal, the limited emissions are equal to the unlimited emissions.

**Production and Fuel Limitations**

Maximum Hourly Boiler Slag Processing Rate =	25	ton/hr
Annual Boiler Slag Processing Limitation =	71,000	ton/yr
Natural Gas Limitation =	61.3	MMCF/yr

**Limited Emissions**

Criteria Pollutant	Emission Factor (units)	Limited Potential to Emit (tons/yr)	Worse Case Fuel (tons/yr)
	Natural Gas (lb/MMCF)	Natural Gas (tons/yr)	
PM	1.9	0.06	<b>0.06</b>
PM10	7.6	0.23	<b>0.23</b>
SO <sub>2</sub>	0.6	0.02	<b>0.02</b>
NO <sub>x</sub>	100	3.07	<b>3.07</b>
VOC	5.5	0.17	<b>0.17</b>
CO	84	2.58	<b>2.58</b>
<b>Hazardous Air Pollutant</b>			
HCl			<b>0</b>
Antimony			<b>0</b>
Arsenic	2.0E-04	6.1E-06	<b>6.1E-06</b>
Beryllium	1.2E-05	3.7E-07	<b>3.7E-07</b>
Cadmium	1.1E-03	3.4E-05	<b>3.4E-05</b>
Chromium	1.4E-03	4.3E-05	<b>4.3E-05</b>
Cobalt	8.4E-05	2.6E-06	<b>2.6E-06</b>
Lead	5.0E-04	1.5E-05	<b>1.5E-05</b>
Manganese	3.8E-04	1.2E-05	<b>1.2E-05</b>
Mercury	2.6E-04	8.0E-06	<b>8.0E-06</b>
Nickel	2.1E-03	6.4E-05	<b>6.4E-05</b>
Selenium	2.4E-05	7.4E-07	<b>7.4E-07</b>
1,1,1-Trichloroethane			<b>0</b>
1,3-Butadiene			<b>0</b>
Acetaldehyde			<b>0</b>
Acrolein			<b>0</b>
Benzene	2.1E-03	6.4E-05	<b>6.4E-05</b>
Bis(2-ethylhexyl)phthalate			<b>0</b>
Dichlorobenzene	1.2E-03	3.7E-05	<b>3.7E-05</b>
Ethylbenzene			<b>0</b>
Formaldehyde	7.5E-02	2.3E-03	<b>2.3E-03</b>
Hexane	1.8E+00	0.06	<b>0.055</b>
Phenol			<b>0</b>
Toluene	3.4E-03	1.0E-04	<b>1.0E-04</b>
Total PAH Haps	negl	negl	<b>0</b>
Polycyclic Organic Matter			<b>0</b>
Xylene			<b>0</b>
<b>Total HAPs</b>			<b>0.06</b>

**Methodology**

Natural Gas: Limited Potential to Emit (tons/yr) = (Natural Gas Limitation (MMCF/yr)) \* (Emission Factor (lb/MMCF)) \* (ton/2000 lbs)

Sources of AP-42 Emission Factors for fuel combustion:

Natural Gas : AP-42 Chapter 1.4 (dated 7/98), Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4

**Abbreviations**

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

SO<sub>2</sub> = Sulfur Dioxide

NO<sub>x</sub> = Nitrous Oxides

VOC - Volatile Organic Compounds

CO = Carbon Monoxide

HAP = Hazardous Air Pollutant

HCl = Hydrogen Chloride

PAH = Polyaromatic Hydrocarbon

## Appendix A.2: Limited Emissions Calculations Slag Dryer SO<sub>2</sub> Emissions

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive,  
 Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

The following calculations determine the limited emissions from the slag drying process.

Maximum Hourly Boiler Slag Processing Rate =  ton/hr  
 Annual Boiler Slag Processing Limitation =  ton/yr  
 % sulfur

Criteria Pollutant	Emission Factor or Limitation (lb/ton)	Limited/Controlled Potential to Emit (tons/yr)
SO <sub>2</sub> *	2.80	99.31

### Methodology

Limited Potential to Emit (tons/yr) = (Annual Boiler Slag Processing Limitation (tons/yr)) \* (Emission Factor (lb/ton)) \* (ton/2000 lbs)

\* Based on a lab analysis of a representative sample of the slag processed by Gibbco, Inc., conducted 01/21/2011, the worst case sulfur content of the boiler slag is 0.07%.

Using worst case rationale, if slag containing 0.07% sulfur content were heated it could potentially release 100% of that sulfur in the form of SO<sub>2</sub>.

Therefore, using a simple proportion, slag containing 0.07% sulfur (molecular weight 32.065) could potentially form and release 0.14% SO<sub>2</sub> (molecular weight 64.07).

An emission factor (lbs/ton) was generated using this information, as follows: 0.14% is equivalent to 0.14 parts per 100, so  $0.14/100 = 0.0014$  lbs SO<sub>2</sub> /lb slag, and  $0.0014$  lbs of SO<sub>2</sub>/lb of slag \* 2000 lbs/1ton = 2.80 lbs of SO<sub>2</sub>/ton of slag.

### Abbreviations

SO<sub>2</sub> = Sulfur Dioxide

**Appendix A.2: Limited Emissions Calculations  
Slag Processing, Handling, Drying, Crushing, Screening, and Conveying**

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

**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.

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

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 =	10.2	= worst case annual mean wind speed (Source: NOAA, 2006*)
M =	8.0	= material % moisture content of aggregate**
$E_f$ (PM) =	8.59E-04	lb PM/ton of material handled
$E_f$ (PM10) =	4.06E-04	lb PM10/ton of material handled
$E_f$ (PM2.5) =	6.15E-05	lb PM2.5/ton of material handled

Annual Boiler Slag Processing Limitation = 71,000 tons/yr

Type of Activity	Limited PTE of PM (tons/yr)	Limited PTE of PM10 (tons/yr)	Limited PTE of PM2.5 (tons/yr)
Truck unloading of raw materials into temporary storage piles	0.03	0.01	0.00
Front-end loader dumping of materials into raw material feeder hoppers	0.03	0.01	0.00
Truck Loading from finished product storage hoppers	0.03	0.01	0.00
Railcar Loading from conveyor	0.03	0.01	0.00
<b>Total (tons/yr)</b>	<b>0.12</b>	<b>0.06</b>	<b>0.01</b>

Methodology

The percent asphalt cement/binder provided by the source.

Maximum Material Handling Throughput (tons/yr) = [Annual Boiler Slag Processing Limitation (tons/yr)]

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

Raw materials include boiler slag.

\*Worst case annual mean wind speed (Indianapolis, IN) from "Comparative Climatic Data", National Climatic Data Center, NOAA, 2006

\*\* Moisture Content of Boiler Slag from: <http://www.tfhr.gov/hnr20/recycle/waste/cbabs1.htm>, Table 4-4: Typical mechanical properties of bottom ash and boiler slag, Lovell, C. W., T.-C. Ke, W.-H. Huang, and J. E. Lovell. "Bottom Ash As Highway Material," Presented at the 70th Annual Meeting of the Transportation Research Board, Washington, D.C., January, 1991.

**Slag Drying, Crushing, Screening and Conveying**

Operation	Uncontrolled Emission Factor for PM (lbs/ton)*	Uncontrolled Emission Factor for PM10 (lbs/ton)**	Limited PTE of PM (tons/yr)	Limited PTE of PM10/PM2.5 (tons/yr)***
Slag Drying, Crushing, Screening, and Conveying *	2.976	1.42	105.65	50.41
Conveyor transfer to railcar loading apparatus****	0.003	0.0011	0.11	0.04
<b>Limited Potential to Emit (tons/yr) =</b>			<b>105.75</b>	<b>50.45</b>

Methodology

Maximum Material Handling Throughput (tons/yr) = [Annual Boiler Slag Processing Limitation (tons/yr)]

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

Raw materials include boiler slag

\* The slag drying, crushing, and screening operations are all controlled by a single wet scrubber. 2001 stack test data was used to calculate the PM Emission factor, as follows:

3.72 lb PM/hr @ 25 tons/hr throughput = 0.1488 lb PM/ton AFTER the control.

Assuming a 95% control efficiency for the wet scrubber, the PM emission factor BEFORE the control is 2.976 lb PM/ton.

\*\*Using estimation from AP-42 11.19.2, PM10 = PM emission factor/2.1 = 1.42 lb PM10/ton

\*\*\*Assumes PM2.5 emissions are equal to PM10 emissions.

\*\*\*\*Emission Factors for Crushed Stone Processing Operations, Section 11.19.2 (dated 8/04), Table 11.19.2-2, are utilized.

Abbreviations

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

## Appendix A.2: Limited Emissions Calculations Material Storage Piles

**Company Name:** Gibbco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

Note: Since the emissions from the storage piles are minimal, the limited emissions are equal to the unlimited emissions.

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.

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

where  $E_f$  = emission factor (lb/acre/day)  
 $s$  = silt content (wt %)  
 $p$  = 125 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 %)*	Emission Factor (lb/acre/day)	Maximum Anticipated Pile Size (acres)**	PTE of PM (tons/yr)	PTE of PM10/PM2.5 (tons/yr)***
Slag	4.0	4.63	0.75	0.634	0.222
<b>Totals</b>				<b>0.63</b>	<b>0.22</b>

### Methodology

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

PTE of PM10/PM2.5 (tons/yr) = (Potential PM Emissions (tons/yr)) \* 35%

\*Silt content values obtained from AP-42 Table 13.2.4-1 (dated 1/95)

\*\*Maximum anticipated pile size (acres) provided by the source.

\*\*\*Assumes PM2.5 emissions are equal to PM10 emissions.

### Abbreviations

PM = Particulate Matter

PM10 = Particulate Matter (<10 um)

PM2.5 = Particulate Matter (<2.5 um)

PTE = Potential to Emit

RAP = recycled asphalt pavement

**Appendix A.2: Limited Emissions Calculations**  
**Unpaved Roads**

**Company Name:** Gibco, Inc.  
**Source Address:** 901 AEP Drive, Lawrenceburg, Indiana, 47025  
**Permit Number:** F029-29391-00014  
**Reviewer:** Hannah L. Desrosiers  
**Date Received:** 6/24/2010

**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).

Annual Boiler Slag Processing Limitation =  tons/yr  
Natural Gas Limitation =  MMCF/yr

Process	Vehicle Type	Maximum Weight of Vehicle (tons)	Maximum Weight of Load (tons)	Maximum Weight of Vehicle and Load (tons/trip)	Maximum trips per year (trip/yr)	Total Weight driven per year (ton/yr)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/yr)
Aggregate (Slag) Truck Enter Full	Dump truck (16 CY)	15.0	26.0	41	2.7E+03	1.1E+05	520	0.098	268.9
Aggregate (Slag) Truck Leave Empty	Dump truck (16 CY)	15.0	0	15.0	2.7E+03	4.1E+04	520	0.098	268.9
Aggregate (Slag) Loader Full	Front-end loader (3 CY)	15.0	4.2	19.2	1.7E+04	3.2E+05	250	0.047	800.4
Aggregate (Slag) Loader Empty	Front-end loader (3 CY)	15.0	0	15.0	1.7E+04	2.5E+05	250	0.047	800.4
Fuel (NG) Truck Enter Full	Tanker truck (6000 gal)	12.0	32.0	44.00	6.5E+03	2.8E+01	520	0.098	6.4E-04
Fuel (NG) Truck Leave Empty	Tanker truck (6000 gal)	12.0	0	12.00	6.5E+03	7.8E-02	520	0.098	6.4E-04
<b>Total</b>					<b>3.9E+04</b>	<b>7.3E+05</b>			<b>2.1E+03</b>

Average Vehicle Weight Per Trip =  tons/trip  
Average Miles Per Trip =  miles/trip

Unmitigated Emission Factor,  $E_f = k \cdot [(s/12)^a] \cdot [(W/3)^b]$  (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	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	0.9	= constant (AP-42 Table 13.2.2-2)
W =	18.6	18.6	18.6	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor,  $E_{ext} = E_f \cdot [(365 - P)/365]$

Mitigated Emission Factor,  $E_{ext} = E_f \cdot [(365 - P)/365]$   
where P =  days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f$ =	5.87	1.50	0.15	lb/mile
Mitigated Emission Factor, $E_{ext}$ =	3.86	0.98	0.10	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Vehicle Type	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Aggregate (Slag) Truck Enter Full	Dump truck (16 CY)	0.79	0.20	0.02	0.52	0.13	0.01	0.26	0.07	0.01
Aggregate (Slag) Truck Leave Empty	Dump truck (16 CY)	0.79	0.20	0.02	0.52	0.13	0.01	0.26	0.07	0.01
Aggregate (Slag) Loader Full	Front-end loader (3 CY)	2.35	0.60	0.06	1.54	0.39	3.9E-02	0.77	0.20	2.0E-02
Aggregate (Slag) Loader Empty	Front-end loader (3 CY)	2.35	0.60	0.06	1.54	0.39	3.9E-02	0.77	0.20	2.0E-02
Fuel (NG) Truck Enter Full	Tanker truck (6000 gal)	1.87E-06	4.77E-07	4.77E-08	1.23E-06	3.14E-07	3.14E-08	6.15E-07	1.57E-07	1.57E-08
Fuel (NG) Truck Leave Empty	Tanker truck (6000 gal)	1.87E-06	4.77E-07	4.77E-08	1.23E-06	3.14E-07	3.14E-08	6.15E-07	1.57E-07	1.57E-08
<b>Totals</b>		<b>6.27</b>	<b>1.60</b>	<b>0.16</b>	<b>4.12</b>	<b>1.05</b>	<b>0.11</b>	<b>2.06</b>	<b>0.53</b>	<b>0.05</b>

**Methodology**

Maximum Material Handling Throughput = [Annual Boiler Slag Processing Rate Limitation (tons/yr)] \* [1 - Percent Asphalt Cement/Binder (weight %)]  
Maximum Weight of Vehicle and Load (tons/trip) = [Maximum Weight of Vehicle (tons/trip)] + [Maximum Weight of Load (tons/trip)]  
Maximum trips per year (trip/yr) = [Throughput (tons/yr)] / [Maximum Weight of Load (tons/trip)]  
Total Weight driven per year (ton/yr) = [Maximum Weight of Vehicle and Load (tons/trip)] \* [Maximum trips per year (trip/yr)]  
Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]  
Maximum one-way miles (miles/yr) = [Maximum trips per year (trip/yr)] \* [Maximum one-way distance (mi/trip)]  
Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per year (ton/yr)] / SUM[Maximum trips per year (trip/yr)]  
Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/yr)] / SUM[Maximum trips per year (trip/yr)]  
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)

**Abbreviations**

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



# 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](http://www.idem.IN.gov)

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

TO: Brian Keplinger  
Ops Mgr  
Gibbco, Inc.  
PO Box 3453  
Lawrenceburg IN 47025

DATE: Mar. 30, 2011

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

SUBJECT: Final Decision  
FESOP  
029-29391-00014

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](mailto: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](http://www.idem.IN.gov)

Mar. 30, 2011

TO: Lawrenceburg Public Library

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

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

**Applicant Name: Gibbco, Inc.**  
**Permit Number: 029-29391-00014**

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	BMILLER 3/30/2011 Gibbco, Inc 029-29391-00014 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Brian Keplinger Ops Mgr Gibbco, Inc PO Box 3453 Lawrenceburg IN 47025 (Source CAATS) <i>Via Confirm Delivery</i>										
2		Michael & Monica Ramsey 9931 Old SR 56 Aurora IN 47001 (Affected Party)										
3		Dearborn County Commissioner 215 B West High Street Lawrenceburg IN 47025 (Local Official)										
4		Lawrenceburg City Council and Mayors Office 212 Walnut St. Lawrenceburg IN 47025 (Local Official)										
5		Dearborn County Health Department 215-b W. Hight St, County Admin Building Lawrenceburg IN 47025-1910 (Health Department)										
6		Lawrenceburg Public Library 123 W High St Lawrenceburg IN 47025-1995 (Library)										
7		Mr. John Teaney P.O. Box 494 10837 Aurora IN 47001 (Affected Party)										
8		Robin & Vic Willoughby 311 Broadway Street Aurora IN 47001 (Affected Party)										
9		James & Mary Hassett 7199 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										
10		Nancy & William McDaniel 4600 Hartford PK # 98 Aurora IN 47001 (Affected Party)										
11		Ken & Jackie Greive 4685 E. Laughery Creek Road Aurora IN 47001 (Affected Party)										
12		Marlin M. Guss, Jr. 10400 Millstone Dr, P.O. Box 272 Aurora IN 47001 (Affected Party)										
13		Mrs. Shirley Greive 4412 E. Laughery Aurora IN 47001 (Affected Party)										
14		Ms. Patricia Huff 10095 Old SR 56 Aurora IN 47001 (Affected Party)										
15		Sam & Nancy Valone 3826 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)										

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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--

# Mail Code 61-53

IDEM Staff	BMILLER 3/30/2011 Gibbco, Inc 029-29391-00014 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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	Handling 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		Peter & Jody 9212 Hawksridge Dr. Covington KY 41017-9136 (Affected Party)									
2		Mrs. Melanie Bushorn 4172 E. Laughery Creek Rd Aurora IN 47001 (Affected Party)									
3											
4											
5											
6											
7											
8											
9											
10											
11											
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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
---	--	--	--