



# 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: December 20, 2011

RE: Coke Energy LLC / 089-29547-00383

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, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

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

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

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



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## Part 70 Administrative Operating Permit Renewal OFFICE OF AIR QUALITY

**Cokenergy, LLC**  
**a contractor for ArcelorMittal USA, Inc.**  
**3210 Watling Street, MC 2-991**  
**East Chicago, Indiana 46312**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-29547-00383	
Issued by:  Chrystal A. Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 20, 2011  Expiration Date: December 20, 2016

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1, A.3, and A.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]

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The Permittee owns and operates a stationary heat recovery system for coal carbonization operation.

Source Address:	3210 Watling Street, MC 2-991, East Chicago, Indiana 46312
General Source Phone Number:	219-397-3942
SIC Code:	4911
County Location:	Lake
Source Location Status:	Nonattainment for PM <sub>2.5</sub> standard Attainment for all other criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD and Nonattainment NSR Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

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

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The source includes ArcelorMittal USA, Inc. Plant ID 089-00316, an integrated steel mill, collocated with the following on-site contractors:

- (a) ArcelorMittal USA, Inc. (Plant ID 089-00316), the primary operation, is located at, 3210 Watling Street, East Chicago, Indiana;
- (b) Fritz Enterprises Inc. (Plant ID 089-00465), an on-site contractor (an iron and steel recycling process and a coke screening plant), is located at 3210 Watling Street, East Chicago, Indiana;
- (c) Beemsterboer Slag and Ballast Corp. (Plant ID 089-00356), an on-site contractor (a slag crushing and sizing operation), is located at 3210 Watling Street, East Chicago, Indiana;
- (d) East Chicago Recovery (Plant ID 089-00358), an on-site contractor (a briquetting facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (e) Heckett MultiServ (Plant ID 089-00367), an on-site contractor (a scarfing operation), is located at 3236 Watling Street, East Chicago, Indiana;
- (f) Oil Technology (Plant ID 089-00369), an on-site contractor (a used oil recycling facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (g) Mid Continent Coal and Coke (Plant ID 089-00371), an on-site contractor (a metallurgical coke separation facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (h) Indiana Harbor Coke Company (IHCC) (Plant ID 089-00382), an on-site contractor (a heat recovery coal carbonization facility), is located at 3210 Watling Street, East Chicago, Indiana 46312;

- (i) Cokenergy LLC (Plant ID 089-00383), an on-site contractor (a heated gas steam from coal carbonization operation), is located at 3210 Watling Street, East Chicago, Indiana;
- (j) LAFARGE North America (Plant ID 089-00458), an on-site contractor (a slag granulator and pelletizer operation), is located at 3210 Watling Street, East Chicago, Indiana; and
- (k) Phoenix Services LLC, dba Metal Services LLC (Plant ID 089-00536), an on-site contractor (a slag and kish processing operation) is located at 3236 Watling Street, East Chicago, Indiana 46312.

Company Name	TV Permit Number
ArcelorMittal USA, Inc.	089-6577-00316
Fritz Enterprises Inc.	089-20315-00465
Beemsterboer Slag and Ballast Corp.	089-6580-00356
East Chicago Recovery	089-6583-00358
Heckett MultiServ	089-6581-00367
Oil Technology, Inc.	089-6579-00369
Mid Continent Coal and Coke	089-6582-00371
Indiana Harbor Coke Company (IHCC)	089-11311-00382
Cokenergy, LLC	089-11135-00383
LAFARGE North America	089-14766-00458
Phoenix Services LLC, dba Metal Services LLC	089-26806-00536

The source includes ArcelorMittal Indiana Harbor, LLC, an integrated steel mill, with the following on-site contractors:

- (a) ArcelorMittal Indiana Harbor, LLC (Plant ID 089-00318), the primary operation, is located at 3001 Dickey Road, East Chicago, Indiana;
- (b) Oil Tech, Inc (Plant ID 089-00375), an on-site contractor (a used oil recycling facility), is located at 3001 Dickey Road, East Chicago, Indiana;
- (c) International Mill Service (Plant ID 089-00353), an on-site contractor (a steel slab scarfer) is located at 3001 Dickey Road, East Chicago, Indiana;
- (d) Edward Levy (Plant ID 089-00339), an on-site contractor (a slag processing facility), is located at 3001 Dickey Road, East Chicago, Indiana;

- (e) Ironside Energy, LLC (Plant ID 089-00448), an on-site contractor (an industrial steam and electric power cogeneration plant), is located at 3001 Dickey Road, East Chicago, Indiana;
- (f) Phoenix Services, LLC (Plant ID 089-00538), an on-site contractor (a slag and kish processing plant), is located at 3001 Dickey Road, East Chicago, Indiana;
- (g) Beemsterboer Slag Corporation (Plant ID 089-00537), an on-site contractor (a metallurgical coke screening plant), is located at 3001 Dickey Road, East Chicago, Indiana; and
- (h) Mid-Continental Coal and Coke (Plant ID 089-00507), an on-site contractor (metallurgical coke screening plant), is located at 3001 Dickey Road, East Chicago, Indiana.

Company Name	TV Permit Number
ArcelorMittal Indiana Harbor, LLC	089-7099-00318
Oil Technology	089-7517-00375
International Mill Service	089-7562-00353
Edward Levy	089-6260-00339
Ironside Energy	089-11557-00448
Phoenix Services, LLC	089-27232-00538
Beemsterboer Slag Corporation	089-27146-00537
Mid-Continental Coal and Coke	089-21801-00507

Separate Part 70 permits have been issued to ArcelorMittal USA, Inc., ArcelorMittal Indiana Harbor, LLC, and each on-site contractor, solely for administrative purposes. The companies may maintain separate reporting and compliance certification.

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

Cokenergy, LLC consists of the following emission units and pollution control devices:

- (a) Two (2) lime storage silos, identified as ES220, each with a maximum capacity of 29,255 cubic feet, each controlled by dry filters, and exhausting through two (2) stacks Stack ID 220;
- (b) Two (2) Flue Gas Desulfurization (FGD) product storage silos, identified as ES221 and ES222, each with a maximum capacity of 16,775 cubic feet, each controlled by dry filters, and exhausting through Stack IDs 221 and 222, respectively; and
- (c) One (1) lime spray dryer Flue Gas Desulfurization unit and baghouse system, utilized as control for sulfur dioxide and particulate matter emissions from the heat recovery coal carbonization facility (HRCC) waste gas stream, operated by Indiana Harbor Coke Company (IHCC), which exhausts to Stack ID 201.

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

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

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. [326 IAC 8-9-1]
- (c) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

## SECTION B GENERAL CONDITIONS

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

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

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

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- (a) This permit, T089-29547-00383, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

### B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

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

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

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

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

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

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

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

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- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(34), 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) A "responsible official" is defined at 326 IAC 2-7-1(34).

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

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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- (a) A Preventive Maintenance Plan meets the requirements of 326 IAC 1-6-3 if it includes, at a minimum:
- (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.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

The Permittee shall implement the PMPs.

- (c) 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, or Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or  
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)  
Facsimile Number: 317-233-6865  
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

Indiana Department of Environmental Management  
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable

requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

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

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

- (a) All terms and conditions of permits established prior to T089-29547-00383 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised under 326 IAC 2-7-10.5, or
  - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

**B.17 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

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

Indiana Department of Environmental Management  
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]**

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

**B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
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 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

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

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.20 Source Modification Requirement [326 IAC 2-7-10.5]**

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

**B.21 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]**

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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

Indiana Department of Environmental Management  
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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. In the event that the source is a sub-contractor and is combined with a larger Part 70 source, the larger Part 70 source may pay the Permittees' annual fees as part of the larger source billing and subject to the fee cap of the larger source. If, however, the larger Part 70 source does not pay its annual Part 70 permit fee, IDEM, OAQ will assess a separate fee in accordance with 326 IAC 2-7-19(c) to be paid by the Permittee. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

#### C.1 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 twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.2 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.3 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.4 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). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.5 Fugitive Particulate Matter Emissions [326 IAC 6.8-10-3]

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

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The opacity of fugitive particulate emissions from exposed areas shall not exceed ten percent (10%) on a six (6) minute average.
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.

- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) Material processing facilities shall include the following:
  - (1) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
  - (2) The PM<sub>10</sub> emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
  - (3) The PM<sub>10</sub> stack emissions from a material processing facility shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
  - (4) The opacity of fugitive particulate emissions from the material processing facilities, except a crusher at which a capture system is not used, shall not exceed ten percent (10%) opacity.
  - (5) The opacity of fugitive particulate emissions from a crusher at which a capture system is not used shall not exceed fifteen percent (15%).
- (i) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (j) Material transfer limits shall be as follows:
  - (1) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
  - (2) Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%), three (3) minute average.
  - (3) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
    - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a six (6) minute average.
    - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

- (g) **Indiana Licensed Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Licensed Asbestos inspector is not federally enforceable.

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

#### **C.7 Performance Testing [326 IAC 3-6]**

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- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

### **Compliance Requirements [326 IAC 2-1.1-11]**

#### **C.8 Compliance Requirements [326 IAC 2-1.1-11]**

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

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

#### **C.9 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]**

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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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 Continuous Compliance Plan [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

- (a) Pursuant to 326 IAC 326 IAC 6.8-8-1, the Permittee shall submit to IDEM and maintain at source a copy of the Continuous Compliance Plan (CCP). The Permittee shall perform the inspections, monitoring and record keeping in accordance with the information in 326 IAC 6.8-8-5 through 326 IAC 6.8-8-7 or applicable procedures in the CCP.
- (b) Pursuant to 326 IAC 6.8-8-8, the Permittee shall update the CCP, as needed, retain a copy of any changes and updates to the CCP at the source and make the updated CCP available for inspection by the department. The Permittee shall submit the updated CCP, if required to IDEM, OAQ within thirty (30) days of the update.
- (c) Pursuant to 326 IAC 6.8-8, failure to submit a CCP, maintain all information required by the CCP at the source, or submit update to a CCP is a violation of 326 IAC 6.8-8.

C.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. For a boiler, the COMS shall be in operation at all times that the induced draft fan is in operation.
- (b) All COMS shall meet the performance specifications of 40 CFR 60, Appendix B, Performance Specification No. 1, and are subject to monitor system certification requirements pursuant to 326 IAC 3-5.
- (c) In the event that a breakdown of a COMS occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.
- (d) Whenever a COMS is malfunctioning or is down for maintenance or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online within twenty-four (24) hours of shutdown or malfunction of the primary COMS, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.
  - (1) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
  - (2) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during

daylight operations and if weather allows, with at least four (4) hours between each set of readings, until a COMS is online.

- (3) Method 9 readings may be discontinued once a COMS is online.
- (4) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.
- (e) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5, and 40 CFR 60.

**C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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

**Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]**

**C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]**

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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.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

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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 distributed 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.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall 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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

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

**C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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

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

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]  
[326 IAC 2-2][326 IAC 2-3]

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- (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) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A), 40 CFR 51.165(a)(6)(vi)(B), 40 CFR 51.166(r)(6)(vi)(a), and/or 40 CFR 51.166(r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
    - (A) A description of the project.
    - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
    - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
      - (i) Baseline actual emissions;
      - (ii) Projected actual emissions;
      - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii); and

- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 40 CFR 51.165(a)(6)(vi)(A) and/or 40 CFR 51.166(r)(6)(vi)(a)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with following:
  - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
  - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]  
[326 IAC 2-2][326 IAC 2-3]

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- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(34). 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) 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.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1

(qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:

- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted no later than sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (d)(1) and (2) in Section C - General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
  - (4) Any other information that the Permittee wishes to include in this report such as an explanation as to why the emissions differ from the preconstruction projection.

Reports required in this part 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

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

### **Stratospheric Ozone Protection**

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

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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 FACILITY OPERATION CONDITIONS

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

- (a) Two (2) lime storage silos, identified as ES220, each with a maximum capacity of 29,255 cubic feet, each controlled by dry filters, and exhausting through two (2) stacks Stack ID 220;
- (b) Two (2) Flue Gas Desulfurization (FGD) product storage silos, identified as ES221 and ES222, each with a maximum capacity of 16,775 cubic feet, each controlled by dry filters, and exhausting through Stack IDs 221 and 222, respectively; and
- (c) One (1) lime spray dryer Flue Gas Desulfurization unit and baghouse system, utilized as control for sulfur dioxide and particulate matter emissions from the heat recovery coal carbonization facility (HRCC) waste gas stream, operated by Indiana Harbor Coke Company (IHCC), which exhausts to Stack ID 201.

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

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

#### D.1.1 Particulate Matter Emission Offset Minor Modification Limit [326 IAC 2-3]

Pursuant to Significant Permit Modification No. 089-14243-00383, issued on November 30, 2001, in order to make the requirements of 326 IAC 2-3 (Emission Offsets) not applicable, particulate matter (filterable and condensable) emissions from the HRCC waste gas stack (Stack ID 201) shall be limited to less than 50.0 lbs/hr, averaged over a 24-hour period.

#### D.1.2 Sulfur Dioxide Emission Limit [326 IAC 7-4.1-7]

Pursuant to 326 IAC 7-4.1-7, Cokenergy, LLC (Source Identification number 00383), shall comply with the sulfur dioxide emission limit in pounds per hour for the heat recovery coke carbonization waste gas stack, identified as Stack ID 201, combined with the sixteen (16) vents from Indiana Harbor Coke Company (IHCC) of a twenty-four (24) hour average emission rate of one thousand six hundred fifty-six (1,656) pounds per hour.

#### D.1.3 Particulate Matter Limitations Lake County [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, (Particulate emission limitations; fuel combustion steam generators, asphalt concrete plant, grain elevators, foundries, mineral aggregate operations; modification by commissioner), the particulate matter emissions from lime silos identified as ES220, FGD product storage silos ES221 and ES222 and lime spray dryer FGD unit and baghouse system shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

#### D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan is required for these facilities and their control devices. 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 Control and Sulfur Dioxide [326 IAC 2-7-6(6)]

- (a) The baghouse system for lime spray dryer FGD unit (201) shall be in operation at all times the Heat Recovery Coal Carbonization facility is in operation, except during times of required facility maintenance in accordance with the Preventive Maintenance Plan as long as SO<sub>2</sub> emission limits found in Condition D.1.2 are not exceeded.

- (b) The dry filters shall be in operation at all times the lime silos (220) and FGD product storage silo-vents (221 and 222) are in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired, replaced, blanked or isolated, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

**D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]**

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- (a) In order to demonstrate compliance with Condition D.1.1, the Permittee shall perform PM and PM<sub>10</sub> testing on the HRCC waste gas main stack (stack ID 201) utilizing methods as 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 regards to the performance testing required by this condition.
- (b) The Permittee shall grant access and otherwise cooperate with Indiana Harbor Coke Company (IHCC), who shall perform NO<sub>x</sub> testing on the HRCC waste gas main stack (stack ID 201) using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.1.8 (found in INDIANA HARBOR COKE COMPANY (IHCC) Part 70 permit 089-11311-00382). INDIANA HARBOR COKE COMPANY (IHCC) shall repeat these tests at least once every five (5) years from the date of this valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regards to the performance testing required by this condition.

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

**D.1.7 Sulfur Dioxide Monitoring [326 IAC 3-5] [40 CFR Part 64]**

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- (a) Pursuant to Significant Permit Modification No. 089-14243-00383 issued November 30, 2001, and 326 IAC 3-5 (Continuous Monitoring of Emissions), the Permittee shall calibrate, maintain and operate a continuous emissions monitoring systems (CEMS) for measuring SO<sub>2</sub> and O<sub>2</sub> concentrations and pound per hour emission rate on a 24-hour average basis downstream of the lime spray dryer and the baghouse on Stack ID 201 and shall record the output of the systems. The Permittee shall provide record keeping and reporting pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7. The output from CEMS shall be available to Indiana Harbor Coke Company (IHCC) for utilization in the emission tracking program that calculates the combined emissions of SO<sub>2</sub>.
- (b) Cokenergy, LLC, shall maintain the lime feed rate to the FGD at the same or higher rate it was operating at the time of a CEMS breakdown until such time as the CEM is returned to service.

**D.1.8 Opacity Monitoring [326 IAC 3-5] [40 CFR Part 64]**

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Pursuant to Significant Permit Modification No. 089-14243-00383 issued November 30, 2001, and 326 IAC 3-5 (Continuous Monitoring of Emissions), the Permittee shall calibrate, maintain and operate a continuous opacity monitoring systems (COMS) for measuring opacity at the outlet of the baghouse on Stack ID 201 and shall record the output of the systems. The Permittee shall provide record keeping and reporting pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.

**D.1.9 Parametric Monitoring [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)] [40 CFR Part 64]**

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The Permittee shall record the pressure drop across each baghouse used in conjunction with the lime spray dryer FGD unit (201) at least once per day when the heat recovery coal carbonization facility (HRCC) is in operation. When for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 13.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions and 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.

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.1.10 Broken or Failed Bag Detection**

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In the event that bag failure has been observed:

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

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

These monitoring conditions are necessary because the baghouses for the lime spray dryer Flue Gas Desulfurization unit must operate properly to ensure compliance with 326 IAC 6.8-1-2, and 326 IAC 2-3 (Emission Offset).

**D.1.11 Baghouse Inspections [40 CFR Part 64]**

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An inspection shall be performed each calendar quarter of all bags controlling the lime spray dryer Flue Gas Desulfurization unit operation when venting to the atmosphere. A baghouse inspection shall be performed every three (3) months. Inspections required by this condition shall not be performed in consecutive months. All defective bags shall be replaced.

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

**D.1.12 Record Keeping Requirements**

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- (a) To document the compliance status with Conditions D.1.7 and D.1.8, the Permittee shall maintain records required under 326 IAC 3-5-6 at the source in a manner so that they may be inspected by the IDEM, OAQ, or the U.S. EPA., if so requested or required.
- (b) In order to document the compliance status with Condition D.1.9, the Permittee shall maintain records of the pressure drop across the baghouse during normal operation when venting to the atmosphere.
- (c) To document the compliance status with Condition D.1.12, the Permittee shall maintain records of the results of the inspections required under Condition D.1.12.
- (d) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

#### D.1.13 Reporting Requirements

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- (a) The Permittee shall submit a quarterly excess emissions report, if applicable, based on the continuous emissions monitor (CEM) data for SO<sub>2</sub> and O<sub>2</sub> concentrations and pound per hour emission rate on 24-hour average basis, pursuant to 326 IAC 3-5-7. These reports shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by a "responsible official" as defined by 326 IAC 2-7-1(34).
  
- (b) The Permittee shall submit a quarterly excess emissions report, based on the continuous opacity monitor (COM) data for opacity, pursuant to 326 IAC 3-5-7. These reports shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require the certification by a "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.2 FACILITY OPERATION CONDITIONS

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

### Insignificant Activities:

- (a) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]
- (b) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons. [326 IAC 8-9-1]
- (c) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 6.8-1-2]

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

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

#### D.2.1 Particulate Matter Limitations for Lake County [326 IAC 6.8-1]

Pursuant to 326 IAC 6.8-1-2, (Particulate emission limitations; fuel combustion steam generators, asphalt concrete plant, grain elevators, foundries, mineral aggregate operations; modification by commissioner), the particulate matter emissions from the brazing equipment, cutting torches, soldering equipment and welding equipment shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

#### D.2.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all storage vessels.

#### D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations built after January 1, 1980, located in Lake County and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs built after July 1, 1990, and located in Lake County, the Permittee shall ensure that the following requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (2) The solvent is agitated; or
  - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

#### D.2.5 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

- (a) On and after November 1, 1999, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).

- (b) On and after May 1, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).

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

#### **D.2.6 Record Keeping Requirements**

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Pursuant to 326 IAC 8-9, for all storage vessels, the Permittee must keep records of the following:

- (a) The vessel identification number;
- (b) The vessel dimensions; and
- (c) The vessel capacity.

Records shall be maintained for the life of the vessel.

#### **D.2.7 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers)**

---

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), the users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Lake County, except for solvents intended to be used to clean electronic components shall do the following:

- (a) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- (b) All records required by 326 IAC 8-3-8(d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE AND ENFORCEMENT BRANCH  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Cokenergy, LLC  
Source Address: 3210 Watling Street, East Chicago, Indiana 46312  
Part 70 Permit No.: T089-29547-00383

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 OPERATING PERMIT**  
**EMERGENCY OCCURRENCE REPORT**

Source Name: Cokenergy, LLC  
Source Address: 3210 Watling Street, East Chicago, Indiana 46312  
Part 70 Permit No.: T089-29547-00383

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
  - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N
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 AND ENFORCEMENT BRANCH  
 PART 70 OPERATING PERMIT  
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Cokenergy, LLC  
 Source Address: 3210 Watling Street, East Chicago, Indiana 46312  
 Part 70 Permit No.: T089-29547-00383

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

<p>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".</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement (specify permit condition #)</b>	
<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 (specify permit condition #)</b>	
<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>	
<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: \_\_\_\_\_

# **Cokenergy LLC**

3210 Watling Street  
Mail Code 2-991  
East Chicago, IN 46312

## **FUGITIVE DUST CONTROL PLAN**

*326 IAC 6.8-10-4*

**Revision 2**  
**August 31, 2010**



**Fugitive Dust Control Plan**  
Cokenergy LLC

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**APPENDICES**

- Appendix A Site Map
- Appendix B Process Flow Diagrams
- Appendix C Sample Forms and Reports

# Fugitive Dust Control Plan

## Cokenergy LLC

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### **Section 1.0 Facility Description [326 IAC 6.8-10-4(3)(A)]**

Cokenergy LLC. (Cokenergy), a contractor of ArcelorMittal-Indiana Harbor East, owns and operates a facility that treats coke oven flue gas and generates energy located within the ArcelorMittal-Indiana Harbor East Works in East Chicago. The coke oven gas is received from the Indiana Harbor Coke Company (IHCC). IHCC and Cokenergy are two separately owned facilities and have separate operating permits which make reference to one another's facility operations. Both of these facilities are located within ArcelorMittal which is a fully integrated steelmaking and finishing facility. Even though the three facilities are considered to be one source due to contractual control, each of the three operates under its own Part 70 permit for state administrative purposes. Cokenergy is fully responsible for development, implementation and compliance with this plan.

### **Section 2.0 Identification of Facilities [326 IAC 6.8-10-4(3)(B)]**

#### Roadways and Parking Lots

All designated roadways and parking areas at this facility are paved. Roadways are wetted for dust control on an as-needed basis. There are a few designated parking areas that are unpaved. Daily plant surveillance will determine if wet suppression or cleaning is required on roadways and parking areas (paved and unpaved).

#### Storage Piles

Feed materials and byproduct materials are not stored in stock piles at this location.

#### Material Handling Systems

Material handling systems consist of the following units which are point sources with control equipment. Additional fugitive dust control requirements are not applied to these units.

- Two lime storage silos controlled by dry filters for each silo and exhausting through a stacks on each unit (point source emissions)

## **Fugitive Dust Control Plan**

Cokenergy LLC

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- Two Flue Gas Desulfurization (FGD) byproduct storage silos each controlled by dry filters on each unit and exhausting through stacks on each unit (point source emissions)
- One lime spray dryer Flue Gas Desulfurization unit and baghouse system, utilized as control for sulfur dioxide and particulate matter emissions from the heat recovery coal carbonization facility (HRCC) waste gas stream, operated by Indiana Harbor Coke Company (IHCC), which exhausts through a single stack.

Lime is loaded into the lime silo by the pressure pneumatic conveying system of the delivery truck. The truck driver monitors the loading operation for fugitive dust and makes adjustments to the operation as needed to prevent dusting.

Lime flows from the silo to the lime slaker system located within its skirted enclosure below the silo. Dust from silo draw operations is controlled by sealed connecting equipment from the silo to the lime slaker. Dust from the slakers is controlled by water sprays at the dry lime feed into the slaker and by the enclosure of the slaking system within the skirt of the lime silo. An additional wet scrubber system cleans exhaust gases and discharges the scrubber waste into the lime slurry.

FGD byproduct is loaded into a byproduct silo by a vacuum pneumatic system. FGD byproduct is separated from the air stream by the filter-receiver that discharges into its silo. FGD byproduct from the draw of the material from the silo is controlled by the use of a telescoping discharge chute that connects to fully enclosed pneumatic trailers. Dust from the truck loading operation is controlled by a silo bin vent filter and chute transport fan. The dust collected during the loading operation is discharged back into the silo.

### **Section 3.0 Site Map [326 IAC 6.8-10-4(3)(C)]**

A map showing the locations of roads, parking areas, material processing facilities, dust handling equipment, and material transfer points are provided in Appendix A. Raw

**Fugitive Dust Control Plan**  
Cokenergy LLC

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materials and byproduct materials are not stored outdoors in stockpiles. There are no outdoor exposed waste disposal, storage or treatment facilities at this site.

**Section 4.0 Description of Facilities [326 IAC 6.8-10-4(3)(D)]**

Paved roadways consist of one perimeter road and two internal roads with approximate specifications as follows:

- Approximate total length of paved roadways is 3,500 feet
- Average paved roadway width is 20 feet
- Approximate number cars visiting the site per day is less than 100
- Approximate number of large trucks visiting the site per day is less than 15
- Approximate area of paved parking spaces is 2,522 ft<sup>2</sup>

Material processing and handling equipment is described in Section 2.0. The material processing and handling equipment are controlled point sources and are not subject to additional fugitive dust control requirements.

**Section 5.0 Control Measures and Practices [326 IAC 6.8-10-4(3)(E)&(F)]**

Daily plant surveillance is conducted to determine if fugitive dust controls are required on paved roadways or other areas observed. Water application will be the control measure utilized most often with application suspended based on weather events as follows:

- during periods of precipitation
- when temperatures are at or below freezing
- when ice or snow cover is present.

The phrase “weather permitting” used in the following paragraphs herein designates the suspension of control application during the weather events listed above. Process operations and material handling are controlled point sources. Fugitive emissions may be possible during loading and unloading of materials into and out of storage silos, however, this is controlled by utilizing enclosed pneumatic trucks.

**Fugitive Dust Control Plan**  
Cokenergy LLC

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**Section 6.0 Compliance Schedule [326 IAC 6.8-10-4(3)(G)]**

Cokenergy has implemented the provisions of this control plan. This plan will be revised when warranted by an operational change which impacts fugitive dust emissions. Any revision to this plan requires an administrative amendment to the Part 70 Permit.

**Section 7.0 Documentation and Record Keeping [326 IAC 6.8-10-4(4)(A)-(F)]**

Records will be maintained to document control measures and activities in accordance with this plan. These records may be kept as part of the facility's daily maintenance logs. These records will be available upon the request of the state or federal agencies and must be retained for five (5) years. Three years of records must be made readily available for inspection and the remaining two years of records may be stored at a remote location, if necessary, but must be retrievable within a reasonable time frame. All records are generally kept onsite in the administration office.

Records are maintained for:

- Daily plant surveillance and corrective actions, if any
- Roadway wet suppression application
- Incident documentation for occasions where fugitive dust control measures or corrective actions were **not** implemented when it was determined to be necessary based on daily plant surveillance with a statement of explanation.

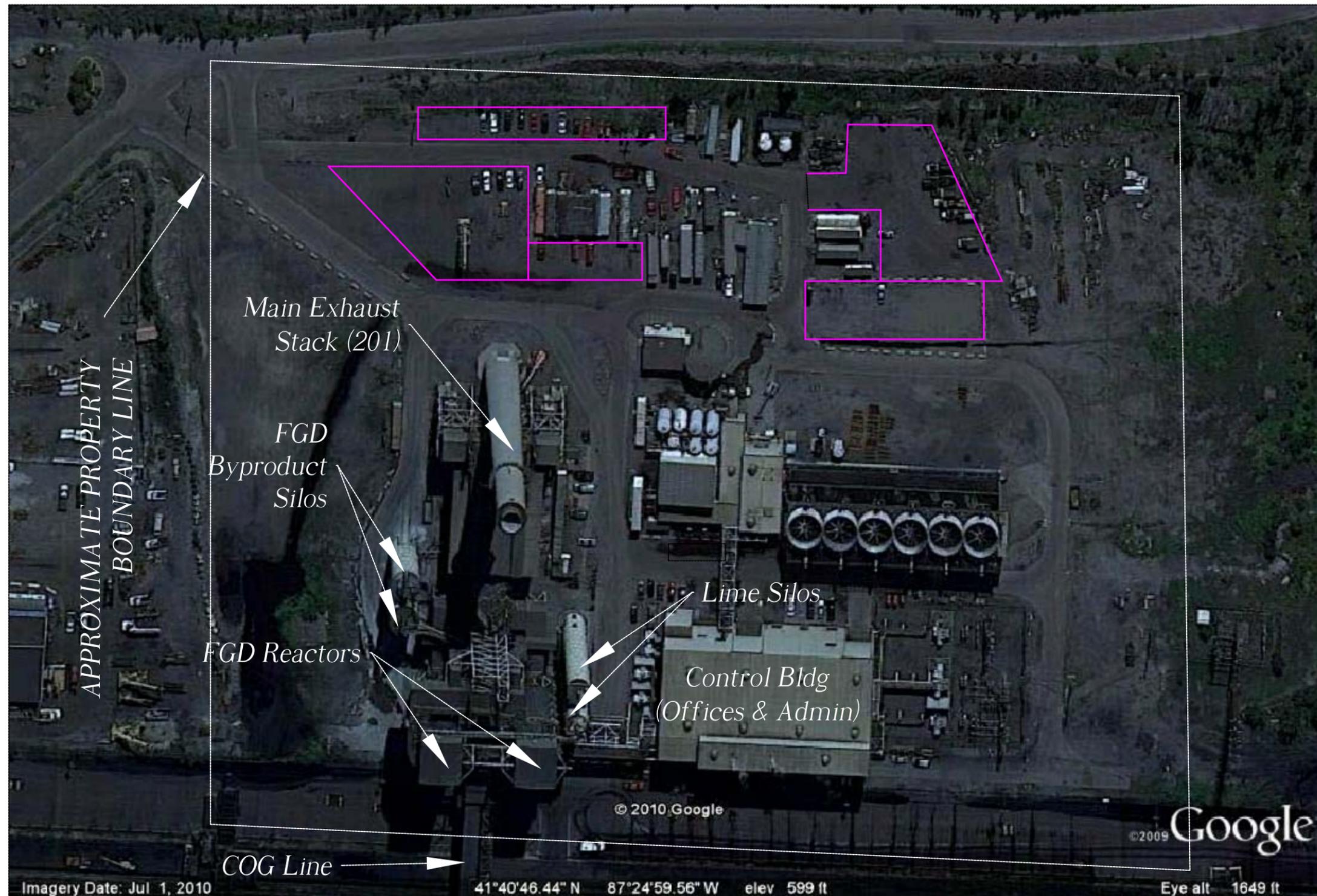
**Section 8.0 Reporting [326 IAC 6.8-10-4(4)(G)]**

Quarterly reports are filed within 30 days after the end of quarter with the following information:

- (i) The dates any required control measures were not implemented.
- (ii) A listing of those control measures.
- (iii) The reasons that the control measures were not implemented.
- (iv) Any corrective action taken.

# **APPENDIX A**

## **SITE MAPS**



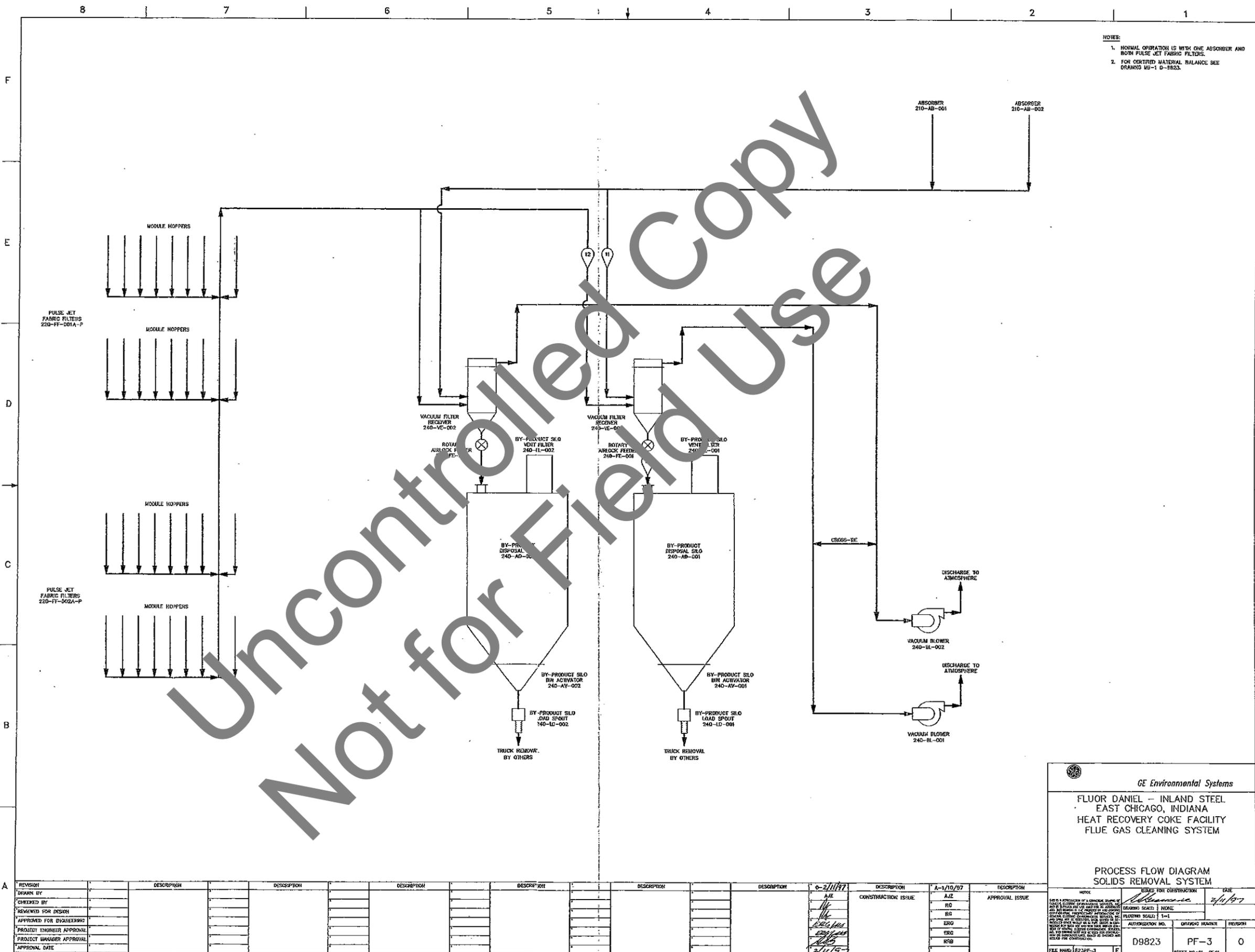

 Indicates Unpaved Parking  
 and Vehicle Movement Areas

Designated paved roadways and parking  
 areas are visible on the map.

 <b>OCS Environmental, Inc.</b>		130 Lincoln Street, Suite 1 Porter, Indiana 46304 Phone- (219) 983-1400 Fax - (219) 983-1414	
Fugitive Dust Control Plan Map Cokenergy LLC (At ArcelorMittal Indiana Harbor East)			
DRAWN:	SSG	SCALE:	NOT TO SCALE
CHECKED:	Review	DATE:	08/30/2010
PROJ:	CPO10002	<b>FDCP MAP</b>	

**APPENDIX B**

**PROCESS FLOW DIAGRAMS**



- NOTES:
1. NORMAL OPERATION IS WITH ONE ABSORBER AND BOTH PULSE JET FABRIC FILTERS.
  2. FOR CERTIFIED MATERIAL BALANCE SEE DRAWING MS-1 D-8823.

Uncontrolled Copy  
Not for Field Use

REVISION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION
1	DESIGNED BY																
2	CHECKED BY																
3	REVIEWED FOR DESIGN																
4	APPROVED FOR ENGINEERING																
5	PROJECT ENGINEER APPROVAL																
6	PROJECT MANAGER APPROVAL																
7	APPROVAL DATE																

GE Environmental Systems

FLUOR DANIEL - INLAND STEEL  
EAST CHICAGO, INDIANA  
HEAT RECOVERY COKE FACILITY  
FLUE GAS CLEANING SYSTEM

PROCESS FLOW DIAGRAM  
SOLIDS REMOVAL SYSTEM

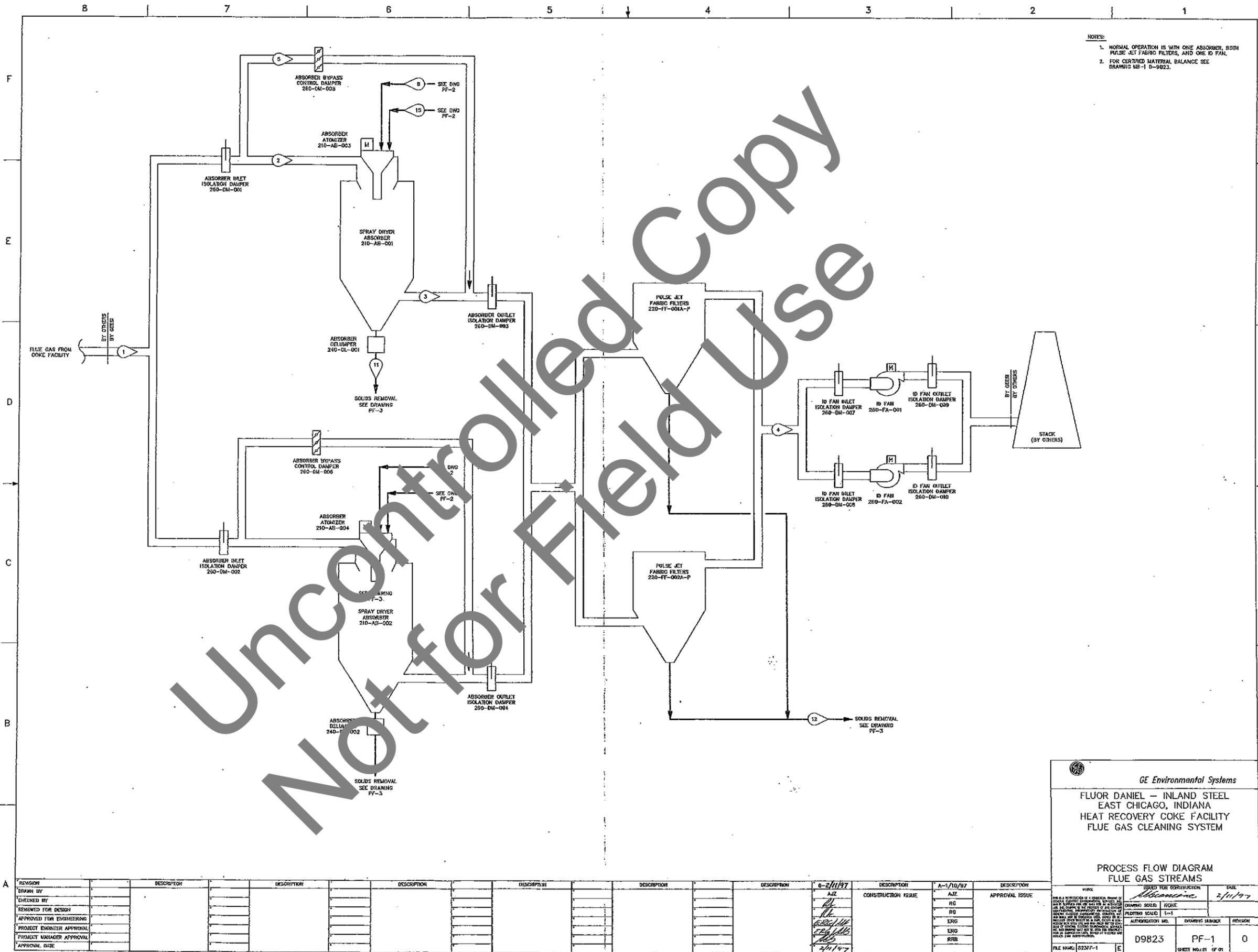
DATE	2/11/97
ISSUED FOR CONSTRUCTION	
DESIGNED BY	
CHECKED BY	
REVIEWED FOR DESIGN	
APPROVED FOR ENGINEERING	
PROJECT ENGINEER APPROVAL	
PROJECT MANAGER APPROVAL	
APPROVAL DATE	

SCALE: 1=1

FILE NAME: E23PF-3

APR 24 1997





- NOTES:
1. NORMAL OPERATION IS WITH ONE ABSORBER, BOTH PULSE JET FABRIC FILTERS, AND ONE ID FAN.
  2. FOR CERTIFIED MATERIAL BALANCE SEE DRAWING MS-1 D-9823.

Not for Field Use

**GE Environmental Systems**

FLUOR DANIEL - INLAND STEEL  
EAST CHICAGO, INDIANA  
HEAT RECOVERY COKE FACILITY  
FLUE GAS CLEANING SYSTEM

PROCESS FLOW DIAGRAM  
FLUE GAS STREAMS

REVISION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION	DESCRIPTION

DATE	DESCRIPTION	DATE	DESCRIPTION
0-2/11/97	CONSTRUCTION ISSUE	A-1/10/97	APPROVAL ISSUE
AJZ		AJZ	
		RC	
		RC	
		ERC	
		ERC	
		RRB	

FILE NAME: 02307-1

D9823 PF-1 0

APR 24 1997 MF

## **APPENDIX C**

### **SAMPLE FORMS AND REPORTS**

Cokenergy LLC  
FUGITIVE DUST CONTROL PLAN

FUGITIVE DUST SURVEILLANCE/INCIDENT REPORT			
<b>ROUTINE ROUNDS</b> <input type="checkbox"/>	<b>INCIDENT REPORT</b> <input type="checkbox"/>		
EQUIPMENT / AREA	Visible emission?		COMMENTS
	no	yes	
<b>Lime Storage Silo No. 1</b>			
<b>Lime Storage Silo No. 2</b>			
<b>Lime Truck Loading Area</b>			
<b>Lime Discharge System</b>			
<b>FGD By-Product Silo No. 1</b>			
<b>FGD By-Product Silo No. 2</b>			
<b>FGD By-Product Truck Loading Area</b>			
<b>By-Product Vacuum Blower Area</b>			
<b>Spray Dryer Absorber Hoppers</b>			
<b>Spray Dryer Absorber Area</b>			
<b>Fabric Filter</b>			
<b>Stack</b>			
<b>Paving</b>			
<b>Grounds</b>			
<b>Other:</b>			
CORRECTIVE ACTION TAKEN			
CONTROL MEASURES NOT IMPLEMENTED			
EXPLANATION AS TO WHY CONTROL MEASURES WERE NOT USED			
OTHER			
<b>SURVEILLANCE / INCIDENT REPORTED BY:</b>			
Name: _____ Date: ___/___/___ Time: _____			



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

Technical Support Document (TSD) for a Part 70 Administrative Operating Permit  
Renewal

**Source Background and Description**

Source Name:	Cokenergy, LLC, a contractor of ArcelorMittal USA, Inc.
Source Location:	3210 Watling Street, MC 2-991, East Chicago, Indiana 46312
County:	Lake
SIC Code:	4911
Operation Permit No.:	T089-29547-00383
Permit Reviewer:	Roger Osburn

The Office of Air Quality (OAQ) has reviewed the administrative operating permit renewal application from Cokenergy, LLC, relating to the operation of a waste heat recovery system for coal carbonization to produce steam and electricity for use at ArcelorMittal USA, Inc. On August 11, 2010, Cokenergy, LLC, submitted an application to the OAQ requesting to renew its operating permit. Cokenergy, LLC, was issued its initial Part 70 Operating Permit on June 29, 2006.

**Source Definition**

The source includes ArcelorMittal USA, Inc. Plant ID 089-00316, an integrated steel mill, collocated with the following on-site contractors:

- (a) ArcelorMittal USA, Inc. (Plant ID 089-00316), the primary operation, is located at, 3210 Watling Street, East Chicago, Indiana;
- (b) Fritz Enterprises Inc. (Plant ID 089-00465), an on-site contractor (an iron and steel recycling process and a coke screening plant), is located at 3210 Watling Street, East Chicago, Indiana;
- (c) Beemsterboer Slag and Ballast Corp. (Plant ID 089-00356), an on-site contractor (a slag crushing and sizing operation), is located at 3210 Watling Street, East Chicago, Indiana;
- (d) East Chicago Recovery (Plant ID 089-00358), an on-site contractor (a briquetting facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (e) Heckett MultiServ (Plant ID 089-00367), an on-site contractor (a scarfing operation), is located at 3236 Watling Street, East Chicago, Indiana;
- (f) Oil Technology (Plant ID 089-00369), an on-site contractor (a used oil recycling facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (g) Mid Continent Coal and Coke (Plant ID 089-00371), an on-site contractor (a metallurgical coke separation facility), is located at 3236 Watling Street, East Chicago, Indiana;
- (h) Indiana Harbor Coke Company (IHCC) (Plant ID 089-00382), an on-site contractor (a heat recovery coal carbonization facility), is located at 3210 Watling Street, East Chicago, Indiana 46312;
- (i) Cokenergy, Inc. (Plant ID 089-00383), an on-site contractor (a waste heat recovery and steam generation facility), is located at 3210 Watling Street, East Chicago, Indiana;

- (j) LAFARGE North America (Plant ID 089-00458), an on-site contractor (a slag granulator and pelletizer operation), is located at 3210 Watling Street, East Chicago, Indiana; and
- (k) Phoenix Services LLC, dba Metal Services LLC (Plant ID 089-00536), an on-site contractor (a slag and kish processing operation) is located at 3236 Watling Street, East Chicago, Indiana 46312.

Company Name	TV Permit Number
ArcelorMittal USA, Inc.	089-6577-00316
Fritz Enterprises Inc.	089-20315-00465
Beemsterboer Slag and Ballast Corp.	089-6580-00356
East Chicago Recovery	089-6583-00358
Heckett MultiServ	089-6581-00367
Oil Technology, Inc.	089-6579-00369
Mid Continent Coal and Coke	089-6582-00371
Indiana Harbor Coke Company (IHCC)	089-11311-00382
Cokenergy LLC	089-11135-00383
LAFARGE North America	089-14766-00458
Phoenix Services LLC, dba Metal Services LLC	089-26806-00536

The source includes ArcelorMittal Indiana Harbor, LLC, an integrated steel mill, with the following on-site contractors:

- (a) ArcelorMittal Indiana Harbor, LLC (Plant ID 089-00318), the primary operation, is located at 3001 Dickey Road, East Chicago, Indiana;
- (b) Oil Tech, Inc (Plant ID 089-00375), an on-site contractor (a used oil recycling facility), is located at 3001 Dickey Road, East Chicago, Indiana;
- (c) International Mill Service (Plant ID 089-00353), an on-site contractor (a steel slab scarfer) is located at 3001 Dickey Road, East Chicago, Indiana;
- (d) Edward Levy (Plant ID 089-00339), an on-site contractor (a slag processing facility), is located at 3001 Dickey Road, East Chicago, Indiana;
- (e) Ironside Energy, LLC (Plant ID 089-00448), an on-site contractor (an industrial steam and electric power cogeneration plant), is located at 3001 Dickey Road, East Chicago, Indiana;
- (f) Phoenix Services, LLC (Plant ID 089-00538), an on-site contractor (a slag and kish processing plant), is located at 3001 Dickey Road, East Chicago, Indiana;

- (g) Beemsterboer Slag Corporation (Plant ID 089-00537), an on-site contractor (a metallurgical coke screening plant), is located at 3001 Dickey Road, East Chicago, Indiana; and
- (h) Mid-Continental Coal and Coke (Plant ID 089-00507), an on-site contractor (metallurgical coke screening plant), is located at 3001 Dickey Road, East Chicago, Indiana.

Company Name	TV Permit Number
ArcelorMittal Indiana Harbor, LLC	089-7099-00318
Oil Technology	089-7517-00375
International Mill Service	089-7562-00353
Edward Levy	089-6260-00339
Ironside Energy	089-11557-00448
Phoenix Services, LLC	089-27232-00538
Beemsterboer Slag Corporation	089-27146-00537
Mid-Continental Coal and Coke	089-21801-00507

Separate Part 70 permits have been issued to ArcelorMittal USA, Inc., ArcelorMittal Indiana Harbor, LLC, and each on-site contractor, solely for administrative purposes. The companies may maintain separate reporting and compliance certification.

**Permitted Emission Units and Pollution Control Equipment**

Cokenergy, LLC consists of the following permitted emission units:

- (a) Two (2) lime storage silos, identified as ES220, each with a maximum capacity of 29,255 cubic feet, each controlled by dry filters, and exhausting through two (2) stacks at Stack ID 220;
- (b) Two (2) Flue Gas Desulfurization (FGD) product storage silos, identified as ES221 and ES222, each with a maximum capacity of 16,775 cubic feet, each controlled by dry filters, and exhausting through Stack IDs 221 and 222, respectively; and
- (c) One (1) lime spray dryer Flue Gas Desulfurization unit and baghouse system, utilized as control for sulfur dioxide and particulate matter emissions from the heat recovery coal carbonization facility (HRCC) waste gas stream, operated by Indiana Harbor Coke Company (IHCC), which exhausts to Stack ID 201.

**Insignificant Activities**

Cokenergy, LLC, also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Space heaters, process heaters, or boilers using the following fuels:  
 Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

- (2) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacities of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (4) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (5) The following VOC and HAP storage containers:
  - (A) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.
  - (B) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (6) Refractory storage not requiring air pollution control equipment.
- (7) Equipment used exclusively for the following:
  - (A) Packaging lubricants or greases.
  - (B) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (8) Application of oils, greases, lubricants, or other nonvolatile materials applied as temporary protective coatings.
- (9) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as follows:
  - (A) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
  - (B) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Any of the following structural steel and bridge fabrication activities:
  - (A) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
  - (B) Using 80 tons or less of welding consumables.
- (14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

- (15) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.
- (16) Noncontact cooling tower systems with either of the following:
  - (A) Natural draft cooling towers not regulated under a NESHAP.
  - (B) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (17) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (18) Heat exchanger cleaning and repair.
- (19) Process vessel degreasing and cleaning to prepare for internal repairs.
- (20) Paved and unpaved roads and parking lots with public access.
- (21) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (22) Flue gas conditioning systems and associated chemicals such as the following: sodium sulfate, ammonia, and sulfur trioxide.
- (23) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (24) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (25) On-site fire and emergency response training approved by the department.
- (26) Emergency generators as follows:
  - (A) Gasoline generators not exceeding 110 horsepower.
  - (B) Diesel generators not exceeding 1600 horsepower.
  - (C) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- (27) Other emergency equipment as follows:
  - (A) Stationary fire pumps.
- (28) Purge double block and bleed valves.
- (29) Filter or coalescer media changeout.
- (30) Vents from ash transport systems not operated at positive pressure.
- (31) A laboratory as defined in 326 IAC 2-7-1(21)(H).

<b>Existing Approvals</b>
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Since the issuance of Part 70 Operating Permit No. 089-11135-00383 on June 29, 2006, Cokenergy, LLC has constructed or has been operating under the following additional approvals:

- (a) Administrative Amendment No. 089-24122-00383, issued on February 14, 2007.

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.

<b>Enforcement Issue</b>
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There are no enforcement actions pending.

<b>Emission Calculations</b>
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The Permittee has agreed that this source is major for 326 IAC 2-7 (Part 70 Permits) and 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) for all criteria pollutants. No calculations of Potential to Emit have been completed for the criteria pollutants.

<b>County Attainment Status</b>
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Cokenergy, LLC is located in Lake County.

Pollutant	Designation
SO <sub>2</sub>	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 <sup>th</sup> Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O <sub>3</sub>	Attainment effective June 4, 2010. <sup>1</sup>
PM <sub>10</sub>	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO <sub>2</sub>	Cannot be classified or better than national standards.
Pb	Not designated.
<sup>1</sup> The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3.  Basic nonattainment designation effective federally April 5, 2005, for PM <sub>2.5</sub> .	

- (a) **Ozone Standards**  
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Lake County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM<sub>2.5</sub>**  
 Lake County has been classified as nonattainment for PM<sub>2.5</sub> in 70 FR 943 dated January 5, 2005. On May 8, 2008, U.S. EPA promulgated specific New Source Review rules for PM<sub>2.5</sub> emissions. 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**  
 Lake County has been classified as attainment or unclassifiable 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 source is classified as an integrated steel mill, it is considered one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7. Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

**Unrestricted Potential Emissions - ArcelorMittal USA, Inc., and Cokenergy, LLC**

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	Greater than 100
PM <sub>10</sub>	Greater than 100
PM <sub>2.5</sub> (1)	Greater than 100
SO <sub>2</sub>	Greater than 100
VOC	Greater than 100
CO	Greater than 100
NO <sub>x</sub>	Greater than 100
GHG(2)	Greater than 100,000
Single HAP	Greater than 10
Total HAP	Greater than 25

(1) PM<sub>2.5</sub> equal to PM<sub>10</sub> for purposes of this determination.

(2) The source has stated that Greenhouse Gases (GHG) are emitted at a level greater than 100,000 tons per year.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants is equal to or greater than 100 tons per year and the potential to emit of GHG is equal to or greater than one hundred thousand (100,000) tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e) emissions per year. Therefore, the source is subject to the provisions of 326 IAC 2-7 and will be issued a Part 70 Administrative Operating Permit Renewal.

**Actual Emissions – Cokenergy, LLC, only**

The following table shows the actual emissions as reported by Cokenergy, LLC. This information reflects the 2009 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
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Pollutant	Actual Emissions (tons/year)
PM	--
PM <sub>10</sub>	190
PM <sub>2.5</sub>	85
SO <sub>2</sub>	5,475
VOC	--
CO	--
NO <sub>x</sub>	--
GHG	--
HAP (specify)	--

**Part 70 Permit Conditions**

Cokenergy, LLC is subject to the requirements of 326 IAC 2-7, because the source met the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

**Potential to Emit After Issuance**

- (a) This existing stationary source is major for PSD because the emissions of at least one regulated pollutant, not including GHG, are greater than one hundred (>100) tons per year, and it is in one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is major for Nonattainment NSR because the emissions of the nonattainment pollutant, (PM<sub>2.5</sub>) are greater than one hundred (>100) tons per year.

**Federal Rule Applicability**

- (a) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to each existing pollutant-specific emission unit that meets the following criteria:
  - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
  - (2) is subject to an emission limitation or standard for that pollutant; and
  - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
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Emission Unit / Pollutant	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
ES220/PM	Y	Y	<100	<100	100	N	N
ES221/PM	Y	Y	<100	<100	100	N	N
ES222/PM	Y	Y	<100	<100	100	N	N
HRCC/PM	Y	Y	>100	>100	100	Y	Y
HRCC/SO <sub>2</sub>	Y	Y	>100	>100	100	Y	Y

Based on this evaluation, the requirements of 40 CFR Part 64, CAM, are applicable to HRCC for PM/PM<sub>10</sub> as a large unit. A CAM plan has been submitted and the Compliance Determination and Monitoring Requirements section includes a detailed description of the CAM requirements.

Based on this evaluation, the requirements of 40 CFR 64, CAM, are applicable to HRCC for SO<sub>2</sub> as a large unit. The compliance monitoring and determination requirements applicable to the HRCC are sufficient to satisfy the requirements of CAM for SO<sub>2</sub>. See the Compliance Determination and Monitoring Requirements section of this document for additional detail.

- (b) The insignificant space heaters, process heaters, or boilers are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR Part 60, Subpart HHHH (Emission Guidelines and Compliance Times for Coal-Fired Electric Steam Generating Units) because they burn propane or liquefied petroleum gas, or butane.
- (c) The insignificant equipment powered by internal combustion engines are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR Part 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) because construction commenced prior to July 11, 2005.
- (d) The insignificant equipment powered by internal combustion engines are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR Part 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines) because construction commenced prior to June 12, 2006.
- (e) The insignificant equipment powered by internal combustion engines are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR Part 60, Subpart KKKK (Standards of Performance for Stationary Combustion Turbines) because they are not combustion turbines.
- (f) The insignificant equipment powered by internal combustion engines are not subject to the National Emissions Standards for Hazardous Air Pollutants, 326 IAC 20 and 40 CFR Part 63, Subpart ZZZZ (National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) because the engines are less than 500 horsepower.
- (g) The insignificant equipment powered by internal combustion engines are not subject to the National Emissions Standards for Hazardous Air Pollutants, 326 IAC 20 and 40 CFR Part 63, Subpart YYYYY (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines) because the engines are not combustion turbines.

<b>State Rule Applicability - Entire Source</b>
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326 IAC 1-6-3 (Preventive Maintenance Plan)

The source submitted a Preventive Maintenance Plan (PMP) on July 6, 1999. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (Prevention of Significant Deterioration), 326 IAC 2-3 (Emission Offset) and 326 IAC 2-1.1-5 (Nonattainment NSR)

Lake County has been designated as non-attainment for PM<sub>2.5</sub> in 70 FR 943 dated April 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM<sub>2.5</sub> Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM<sub>2.5</sub> major NSR regulations, states should assume that a major stationary source's PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions. IDEM will use the PM<sub>10</sub> nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM<sub>2.5</sub> NAAQS. A major source in a nonattainment area as a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Cokenergy, LLC, has a limited potential to emit of PM<sub>10</sub> greater than 100 tpy. Therefore, assuming that PM<sub>10</sub> emissions represent PM<sub>2.5</sub> emissions, this source is a major source for the PM<sub>2.5</sub> standard under Nonattainment NSR because it has the potential to emit greater than 100 tons of PM<sub>10</sub> per year. Any future modifications that increase PM<sub>10</sub> or PM<sub>2.5</sub> emissions must be reviewed in accordance with 326 IAC 2-1.1-5. In addition, Cokenergy, LLC, is a contractor for ArcelorMittal USA, Inc. and is considered one (1) source due to contractual control. Since this source is in one (1) of the 28 listed source categories, it is a major source under 326 IAC 2-2 (PSD), 326 IAC 2-3 (Emission Offset), and Nonattainment NSR.

- (a) Pursuant to Significant Permit Modification No. 089-14243-00383, issued on November 30, 2001, in order to make the requirements of 326 IAC 2-3 (Emission Offsets) not applicable, particulate matter (PM) (filterable and condensable) emissions from the HRCC waste gas stack (Stack ID 201) shall be limited to less than 50.0 lbs/hr, averaged over a 24-hour period.
- (b) Pursuant to CP 089-9237-00383, issued on February 26, 1998, in order to make the requirements of 326 IAC 2-3 (Emission Offsets) not applicable, particulate matter emissions exiting the HRCC waste gas stack (Stack ID 201) shall not exceed an opacity of ten percent (10%) in a six-minute average.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is located in Lake County and its emissions of VOC and NO<sub>x</sub> are greater than twenty-five (25) tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(1), annual reporting is required. An emission statement shall be submitted by July 1, 2011 and every year thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

This source is subject to the opacity limitations specified in 326 IAC 5-1-2.

326 IAC 6.8 (PM Limitations for Lake County)

This source is subject to 326 IAC 6.8 because it is located in Lake County, its PM PTE is equal to or greater than 100 tons/year or actual emissions are greater than ten (10) tons/year. However, this source is not one (1) of the sources specifically listed in 326 IAC 6.8-2-3 through 326 IAC 6.8-2-38. Therefore, 326 IAC 6.8-1-2 applies.

326 IAC 6.8-1-2 (Particulate emission limitations; fuel combustion steam generators, asphalt concrete plant, grain elevators, foundries, mineral aggregate operations; modification by commissioner)

Pursuant to 326 IAC 6.8-1-2, the particulate matter emissions from the lime silos (220), FGD product storage silos (221 and 222) and lime spray dryer FGD unit and baghouse system (201) shall not exceed 0.03 grains per dry standard cubic foot (gr/dscf).

326 IAC 6.8-8 (Continuous Compliance Plan)

Pursuant to 326 IAC 6.8-8, the Permittee shall submit to IDEM, OAQ and maintain at the source a copy of a Continuous Compliance Plan (CCP).

- (a) Pursuant to 326 IAC 6.8-8, a CCP shall also be submitted by any source in Lake County for facilities that perform manufacturing operations in a building or structure such that the total uncontrolled PM<sub>10</sub> emissions from all such operations amount to ten (10) tons per year or more and that could potentially escape into the atmosphere through roof vents and other openings. The uncontrolled PM<sub>10</sub> emissions shall be estimated with AP-42, "Compilation of Air Pollutant Emission Factors, Volume I, (Stationary Point and Area Sources)", 4th Edition, September 1985, (and succeeding amendments) emission factors or other document-able emission factors acceptable to the commissioner.
- (b) Pursuant to 326 IAC 6.8-8, the Permittee shall include the following information or applicable procedures, or commit to the following actions:
  - (1) Pursuant to 326 IAC 6.8-8, the plans for the particulate matter control equipment shall provide that the following control equipment related information will be maintained at the source's property and will be available for inspection by department personnel:
    - (A) Startup, shutdown, and emergency shutdown procedures.
    - (B) Sources shall notify the department fifteen (15) days in advance of startup of either new control equipment or control equipment to which major modifications have been made.
    - (C) Manufacturer's recommended inspection procedures, preventive and corrective maintenance procedures, and safety devices and procedures, such as sensors, alarm systems, and bypass systems. If manufacturer's recommendations are not available, procedures shall be developed by the source.
    - (D) Contents of the operator's training program and the frequency with which the training is held.
    - (E) A list of spare parts available at the facility.
    - (F) A list of control equipment safety devices, for example, high temperature sensors and alarm systems, exhaust gas stream bypass system, or safety interlock system.
    - (G) Monitoring and recording devices and/or instruments to monitor and record control equipment operating parameters specified in subsection (n)(4).
  - (2) Pursuant to 326 IAC 6.8-8, the plans for a facility controlled with a baghouse shall include the recording, inspection, and maintenance procedures to be consistent with the requirements of subsection 326 IAC 6.8-8, such as the following:
    - (A) Operating parameters, such as the following:
      - (i) Pressure drop across the baghouse.
      - (ii) Gas flow rate at baghouse inlet.
      - (iii) Gas temperatures at inlet.

A CCP shall identify the monitors and instrumentation, and their location, accuracy, precision, and calibration frequency. A CCP shall also include a description of any visible emission evaluation program.

- (B) Baghouse cleaning system. A complete description of the cleaning system, including such information as intensity, duration, frequency, and method of activation.
- (C) Baghouse inspection and maintenance schedule. The inspection schedule logs or records shall be available for inspection by the department for up to one (1) year after the date of inspection. The inspection shall include the activities and frequency of the activities. A source may request an alternative schedule based on manufacturer's recommendations or alternatives documented by the company. The revised schedule must be approved by the department. Inspections shall include the following:
  - (i) Daily inspections shall include the following:
    - (AA) Pressure drop.
    - (BB) Fan amperage.
    - (CC) Cleaning cycle.
    - (DD) Compressed air on pulse jet baghouses for values outside of the operating ranges.
    - (EE) Dust discharge equipment for proper operation.
    - (FF) General check for abnormal audible and visual conditions.
  - (ii) Weekly inspections of the following:
    - (AA) Moving parts on discharge system.
    - (BB) Bypass and isolation damper operation.
    - (CC) Bag tension.
    - (DD) Compressed air lines, oilers, and filters.
    - (EE) Manometer lines.
    - (FF) Temperature indicating equipment.
    - (GG) Bag cleaning sequence.
    - (HH) Drive components on fans.
  - (iii) Monthly inspections of the following:
    - (AA) Bag seating condition.
    - (BB) Moving parts on shaker baghouses.

- (CC) Fan corrosion and blade wear.
- (DD) Hoses and clamps.
- (EE) Bags for leaks and holes.
- (FF) Bag housing for corrosion.
- (iv) Quarterly inspections of the following:
  - (AA) Bags.
  - (BB) Ducts for dust build-up.
  - (CC) Damper valves for proper setting.
  - (DD) Door gaskets.
  - (EE) Baffle plate for wear.
- (v) Annual inspection of the following:
  - (AA) Welds and bolts.
  - (BB) Hoppers for wear.
  - (CC) Cleaning parts for wear.

326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter)

- (a) Pursuant to 326 IAC 6.8-10-3 (Lake County: Fugitive Particulate Matter), the particulate matter emissions from source wide activities shall meet the following requirements:
- (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
  - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
  - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
  - (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
  - (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
  - (6) There shall be a zero percent (0%) frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
  - (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
  - (8) There shall be a zero percent (0%) frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.

- (9) The PM<sub>10</sub> emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
  - (10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
  - (11) Any facility or operation not specified in 326 IAC 6.8-11(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.
  - (12) PM<sub>10</sub> emissions from each material processing stack shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
  - (13) Fugitive particulate matter from the material processing facilities shall not exceed ten percent (10%) opacity.
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan.

326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures)

The source is subject to 326 IAC 6.8-11 because it is subject to the requirements of 326 IAC 6.8-10(a) and 326 IAC 6.8-2. Pursuant to this rule, the source shall comply with 6.8-11-1 through 6.8-11-6 of this rule.

326 IAC 6-4 (Fugitive Dust Emissions)

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).

<b>State Rule Applicability – Individual Facilities</b>
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326 IAC 6-3-2 (Particulate Emissions Limitations for Manufacturing Sources)

The source is not subject to the requirements of 326 IAC 6-3 because the plant is subject to the requirements of 326 IAC 6.8 (Particulate Matter Limitations for Lake County). Pursuant to the applicability requirements (326 IAC 6-3-1(b)), if any limitation established by this rule is inconsistent with applicable limitations contained in 326 IAC 6.8 (Particulate Matter Limitations for Lake County) or 326 IAC 12 (New Source Performance Standards), then the limitations contained in 326 IAC 6.8 or 326 IAC 12 prevail.

326 IAC 7-4.1-7 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-4.1-7, Cokenergy, LLC, shall comply with the sulfur dioxide emission limit in pounds per hour for the heat recovery coke carbonization waste gas stack, identified as Stack ID 201, combined with the sixteen (16) vents from Indiana Harbor Coke Company (IHCC) of a twenty-four (24) hour average emission rate of one thousand six hundred fifty-six (1,656) pounds per hour.

326 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations built after January 1, 1980, located in Clark, Elkhart, Floyd, Lake, Marion, Porter and St. Joseph Counties, and which have potential emissions of one hundred (100) tons per year or greater of VOC, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;

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

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs built after July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:

- (a) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
  - (1) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
  - (2) The solvent is agitated; or
  - (3) The solvent is heated.
- (b) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (c) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (d) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (e) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
  - (1) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
  - (2) A water cover when solvent is used is insoluble in, and heavier than, water.
  - (3) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

326 IAC 8-3-8 (Material requirements for cold cleaning degreasers)

Pursuant to 326 IAC 8-3-8 (Material requirements for cold cleaning degreasers), the users, providers, and manufacturers of solvents for use in cold cleaning degreasers in Lake County, except for solvents intended to be used to clean electronic components shall do the following:

- (a) On and after November 1, 1999, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- (b) On and after May 1, 2001, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- (c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:
  - (1) The name and address of the solvent supplier.
  - (2) The date of purchase.
  - (3) The type of solvent.
  - (4) The volume of each unit of solvent.
  - (5) The total volume of the solvent.
  - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).
- (d) All records required by 326 IAC 8-3-8(d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-1, the Permittee is required to keep records on the information in 326 IAC 8-9-6(a)-(b) for all storage vessels.

<b>Compliance Determination and Monitoring Requirements</b>
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Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) Pursuant to Construction Permit No. 089-9237-00383, issued on February 26, 1998, the baghouse for lime spray dryer FGD unit (201) shall be in operation at all times the Heat Recovery Coal Carbonization facility is in operation, except during times of required facility maintenance in accordance with the Preventive Maintenance Plan as long as SO<sub>2</sub> emission limits found in Condition D.1.2 are not exceeded.
- (b) The dry filters shall be in operation at all times the lime silos (220) and FGD product storage silo-vents (221 and 222) are in operation.
- (c) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired, replaced, blanked or isolated, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.
- (d) The Permittee shall perform PM and PM<sub>10</sub> testing on the HRCC waste gas main stack (stack ID 201) utilizing methods as 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 regards to the performance testing required by this condition.
- (e) The Permittee shall grant access and otherwise cooperate with Indiana Harbor Coke Company (IHCC), who shall perform NO<sub>x</sub> testing on the HRCC waste gas main stack (stack ID 201) using methods as approved by the Commissioner, in order to demonstrate compliance with condition D.1.8 (found in Indiana Harbor Coke Company (IHCC) Part 70 permit 089-11311-00382). Indiana Harbor Coke Company (IHCC) shall repeat these tests at least once every five (5) years from the date of this valid compliance demonstration. Section C - Performance Testing contains the Permittee's obligation with regards to the performance testing required by this condition.

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

- (a) Pursuant to 326 IAC 6.8-8, the Permittee shall submit to IDEM, OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6.8-8, the Permittee shall perform the inspections, monitoring and recordkeeping requirements as specified or in accordance to the Permittee's CCP.
- (b) The lime spray dryer Flue Gas Desulfurization unit which exhausts to stack ID 201, has applicable compliance monitoring conditions as specified below:
  - (1) Pursuant to Significant Permit Modification No. 089-14243-00383, issued November 30, 2001 and 326 IAC 3-5 (Continuous Monitoring of Emissions), the Permittee shall calibrate, maintain and operate a continuous emissions monitoring systems (CEMS) for measuring SO<sub>2</sub> and O<sub>2</sub> concentrations and pound per hour emission rate on a 24-hour average basis downstream of the lime spray dryer of the baghouse on Stack ID 201 and shall record the output of the systems. The Permittee shall comply with record keeping and reporting pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7. The output from CEMS shall be made available to Indiana Harbor Coke Company (IHCC) for utilization in the emission tracking program that calculates the combined emissions of SO<sub>2</sub> from

main stack 201 and 16 vent stacks.

- (2) Pursuant to Significant Permit Modification No. 089-14243-00383, issued November 30, 2001 and 326 IAC 3-5 (Continuous Monitoring of Emissions), the Permittee shall calibrate, maintain and operate a continuous opacity monitoring systems (COMS) for measuring opacity at the outlet of the baghouse on Stack ID 201 and shall record the output of the systems. The Permittee shall comply with record keeping and reporting pursuant to 326 IAC 3-5-6 and 326 IAC 3-5-7.
- (3) The Permittee shall record the pressure drop across the baghouse used in conjunction with the lime spray dryer Flue Gas Desulfurization unit which exhausts to stack ID 201, at least once per day when heat recovery coal carbonization facility (HRCC) is in operation when venting to the atmosphere. When for any one (1) reading, the pressure drop across the baghouse is outside the normal range of 4.0 and 13.0 inches of water or a range established during the latest valid stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursion 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 violation of this permit.
- (4) Visible emission notations of the baghouse stack exhaust from stack 201 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (5) 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.
- (6) 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.
- (7) 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.
- (8) If abnormal emissions are observed, 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. Failure to take response steps shall be considered a deviation from this permit.
- (9) Cokenergy, LLC, shall maintain the lime feed rate to the FGD at the same rate or higher that it was operating at the time of a CEMS breakdown until such time as the CEM is returned to service.

These monitoring conditions are necessary to determine compliance with 326 IAC 6.8-8 (Continuous Compliance Plan), 326 IAC 2-2 (PSD), and 326 IAC 2-3 (Emission Offset). The continuous emissions monitoring systems (CEMS) measuring SO<sub>2</sub> and O<sub>2</sub> concentrations satisfy the requirements of 40 CFR 64 (CAM).

<b>Recommendation</b>
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The staff recommends to the Commissioner that the Part 70 Administrative Operating Permit Renewal be approved. This recommendation is based on the following facts and conditions:

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

<b>Conclusion</b>
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The operation of this heat recovery system for coal carbonization operation shall be subject to the conditions of the attached Part 70 Administrative Operating Permit Renewal No. 089-29547-00383.

<b>IDEM Contact</b>
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- (a) Questions regarding this proposed permit can be directed to Roger Osburn 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) 233-0242 or toll free at 1-800-451-6027 extension 3-0242.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: [www.idem.in.gov](http://www.idem.in.gov).

**Appendix A: Emissions Summary**

**Company Name:** Cokenergy LLC - contractor of ArcelorMittal  
**Address City IN Zip:** 3210 Watling Street, East Chicago, Indiana  
**Permit Number:** T089-29547-00383  
**Reviewer:** Roger Osburn  
**Date:** February 14, 2011

**Uncontrolled Potential To Emit (PTE)**

Pollutant	Process	Emission Unit	System Design Product Handling [tons]	Emission Factor [lb/ton]	Uncontrolled PTE [lbs/year]	Uncontrolled PTE [tons/year]
PM	Limestone Storage Bin Vent Filter	ES220	26,280	0.72	18,922	9.5
PM	FGD Byproduct Unloading	ES221	29,565	0.72	21,287	10.6
PM	FGD Byproduct Unloading	ES222	29,565	0.72	21,287	10.6
PM10	Limestone Storage Bin Vent Filter	ES220	26,280	0.46	12,089	6.0
PM10	FGD Byproduct Unloading	ES221	29,565	0.46	13,600	6.8
PM10	FGD Byproduct Unloading	ES222	29,565	0.46	13,600	6.8

Methodology: Uncontrolled PTE = Throughput x Emission factor / 2000

Note: The AP-42 emission factor taken from 11.12-2 represents worst-case conditions since cement is a much finer material than limestone or FGD byproduct.



# 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:** James Schaddel  
Cokenergy LLC - contractor of ArcelorMittal (316)  
3210 Watling St, MC 2-991  
East Chicago, IN 46312

**DATE:** December 20, 2011

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

**SUBJECT:** Final Decision  
Title V Renewal  
089-29547-00383

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:  
James Schaddel General Manager Cokenergy LLC  
Responsible Official Mittal Steel  
Matthew Speer Capital Power Operations (USA) Inc.  
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

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**Governor**

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Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

December 20, 2011

TO: East Chicago Public Library

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

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

**Applicant Name: Coke Energy LLC**  
**Permit Number: 089-29547-00383**

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	CDENNY 12/20/2011 Cokenergy LLC - contractor of ArcelorMittal 089- 29547-00383 (final)			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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		James Schaddel Cokenergy LLC - contractor of ArcelorMittal (316) 3210 Watling St, MC 2-991 East Chicago IN 46312 (Source CAATS)										
2		James Schaddel General Manager Cokenergy LLC - contractor of ArcelorMittal (316) 3210 Watling St, MC 2-991 East Chicago IN 46312 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Indiana State Representative 2nd District 4114 Butternut St East Chicago IN 46312 (Legislator)										
5		East Chicago Public Library 2401 E Columbus Dr East Chicago IN 46312-2998 (Library)										
6		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
7		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
8		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
9		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
10		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
11		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
12		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
13		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
14		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
15		Responsible Official Mittal Steel 3210 Watling St. East Chicago IN 46312-1610 (source - addl contact)										

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.
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# Mail Code 61-53

IDEM Staff	CDENNY 12/20/2011 Cokenergy LLC - contractor of ArcelorMittal 089- 29547-00383 (final)		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	Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	

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		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
2		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
3		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
4		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
5		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
6		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
7		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
8		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
9		Matthew Speer Capital Power Operations (USA) Inc. 2000 York Road, Suite 129 Oak Brook IL 60522 (Consultant)										
10		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
11		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
12		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
13												
14												
15												

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