



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

Carol S. Comer
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding the Renewal of a
Federally Enforceable State Operating Permit (FESOP)

for RJR Drying, Inc. in Lake County

FESOP Renewal No.: F089-37514-00360

The Indiana Department of Environmental Management (IDEM) has received an application from RJR Drying, Inc. located at 3600 Canal Street, East Chicago, Indiana 46312 for a renewal of its FESOP issued on August 1, 2007. If approved by IDEM's Office of Air Quality (OAQ), this proposed renewal would allow RJR Drying, Inc. to continue to operate its existing source.

This draft FESOP Renewal does not contain any new equipment that would emit air pollutants; however, some conditions from previously issued permits/approvals have been corrected, changed, or removed. These corrections, changes, and removals may include Title I changes (e.g., changes that add or modify synthetic minor emission limits). This notice fulfills the public notice procedures to which those conditions are subject. IDEM has reviewed this application and has developed preliminary findings, consisting of a draft permit and several supporting documents, which would allow for these changes.

A copy of the permit application and IDEM's preliminary findings are available at:

Robert A. Pastrick Library
1008 West Chicago Ave.
East Chicago, IN 46312

and

IDEM Northwest Regional Office
330 W. US Highway 30, Suites E & F
Valparaiso, IN 46385

A copy of the preliminary findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

How can you participate in this process?

The date that this notice is published in a newspaper marks the beginning of a 30-day public comment period. If the 30th day of the comment period falls on a day when IDEM offices are closed for business, all comments must be postmarked or delivered in person on the next business day that IDEM is open.

You may request that IDEM hold a public hearing about this draft permit. If adverse comments concerning the **air pollution impact** of this draft permit are received, with a request for a public hearing, IDEM will decide whether or not to hold a public hearing. IDEM could also decide to hold a public meeting instead of, or in addition to, a public hearing. If a public hearing or meeting is held, IDEM will make a separate announcement of the date, time, and location of that hearing or meeting. At a hearing, you would have an opportunity to submit written comments and make verbal comments. At a meeting, you would have an opportunity to submit written comments, ask questions, and discuss any air pollution concerns with IDEM staff.

Comments and supporting documentation, or a request for a public hearing should be sent in writing to IDEM at the address below. If you comment via e-mail, please include your full U.S. mailing address so that you can be added to IDEM's mailing list to receive notice of future action related to this permit. If you do not want to comment at this time, but would like to receive notice of future action related to this permit application, please contact IDEM at the address below. Please refer to permit number F089-37514-00360 in all correspondence.

Comments should be sent to:

Kristen Willoughby
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension 3-3031
Or dial directly: (317) 233-3031
Fax: (317) 232-6749 attn: Kristen Willoughby
E-mail: kwilloug@idem.IN.gov

All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have legal authority to regulate zoning, odor, or noise. For such issues, please contact your local officials.

For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

What will happen after IDEM makes a decision?

Following the end of the public comment period, IDEM will issue a Notice of Decision stating whether the permit has been issued or denied. If the permit is issued, it may be different than the draft permit because of comments that were received during the public comment period. If comments are received during the public notice period, the final decision will include a document that summarizes the comments and IDEM's response to those comments. If you have submitted comments or have asked to be added to the mailing list, you will receive a Notice of the Decision. The notice will provide details on how you may appeal IDEM's decision, if you disagree with that decision. The final decision will also be available on the Internet at the address indicated above, at the local library indicated above, at the IDEM Regional Office indicated above, and the IDEM public file room on the 12th floor of the Indiana Government Center North, 100 N. Senate Avenue, Indianapolis, Indiana 46204-2251.

If you have any questions, please contact Kristen Willoughby of my staff at the above address.



Jenny Acker, Section Chief
Permits Branch
Office of Air Quality



Indiana Department of Environmental Management

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Michael R. Pence
Governor

DRAFT

Carol S. Comer
Commissioner

Federally Enforceable State Operating Permit
Renewal
OFFICE OF AIR QUALITY

RJR Drying, Inc.
3600 Canal Street
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. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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

Table with permit details: Operation Permit No.: F089-37514-00360, Issued by: Jenny Acker, Section Chief, Permits Branch, Office of Air Quality, Issuance Date, Expiration Date.

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary coke handling and drying plant.

Source Address:	3600 Canal Street, East Chicago, Indiana 46312
General Source Phone Number:	219-398-4300
SIC Code:	5025
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-8-1][326 IAC 2-7-1 (22)]

This coke handling facility consists of the following:

- (a) RJR Drying, Inc., the primary operation, owns and operates a stationary coke handling and drying plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00360);
- (b) Mid-Continent Coal and Coke Company, the supporting operation, owns and operates one (1) portable coke screening, sizing, and handling plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-05057); and
- (c) American Terminal owns RJR Drying, Inc., located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00357).

These three (3) plants are considered one single source because they have a support relationship and are located on the same property. IDEM made this determination in the review for FESOP #089-14838-00360, issued on January 13, 2003, and still applies to this permit renewal.

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

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

- (a) One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.
- (b) One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.

- (c) One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (d) Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (e) One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (f) One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:
 - (1) One (1) receiving hopper, identified as P-5.
 - (2) One (1) screen, identified as P-5.
 - (3) One (1) covered conveyor, identified as C-6.

A.4 Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities:

- (a) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower: For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.
 - (1) One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; with a maximum capacity of 21.6 tons per hour.
 - (2) One (1) wet coke conveyor, identified as C-0 with a maximum capacity of 21.6 tons per hour.
 - (3) One (1) wet coke storage pile.
 - (4) One (1) coke crushing and screening operation, approved for construction in 2008, with a maximum capacity of 10 tons of coke (dry or wet) per hour, with particulate emissions controlled by a dust collector (B-5), and exhausting to stack S-5, consisting of the following:
 - (A) One (1) feed hopper, identified as P-6.
 - (B) One (1) coke crusher, identified as P-7.
 - (C) One (1) Rotex screener, identified as P-8.
 - (D) Four (4) conveyors, identified as C-7, C-8, C-9, and C-10, respectively.
- (b) Unpaved roads and parking lots with public access.

A.5 FESOP Applicability [326 IAC 2-8-2]

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, F089-37514-00360, is issued for a fixed term of ten (10) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6][IC 13-17-12]

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

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

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

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

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

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

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

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

- (a) A certification required by this permit meets the requirements of 326 IAC 2-8-5(a)(1) if:

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

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

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. 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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or 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) 464-0233; fax: (219) 464-0553.

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

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

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

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

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

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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

- (a) All terms and conditions of permits established prior to F089-37514-00360 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised, or

(3) deleted.

(b) All previous registrations and permits are superseded by this permit.

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

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

**B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)][326 IAC 2-8-7(a)][326 IAC 2-8-8]**

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

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-8-3(g), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10][326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) and (c) without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

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

(4) The Permittee notifies the:

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

and

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

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

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b)(1) and (c). The Permittee shall make such records available, upon reasonable request, for public review.

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

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

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

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

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

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

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

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19][326 IAC 2-8-4(6)][326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ no later than thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

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

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

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

C.2 Opacity [326 IAC 5-1]

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

- (a) Opacity shall not exceed an average of 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.3 Open Burning [326 IAC 4-1][IC 13-17-9]

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

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

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

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

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

C.6 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 PM₁₀ 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 PM₁₀ 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.7 Stack Height [326 IAC 1-7]

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

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

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

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

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

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

-
- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.11 Compliance Monitoring [326 IAC 2-8-4(3)][326 IAC 2-8-5(a)(1)]

- (a) For new units:
Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units shall be implemented on and after the date of initial start-up.
- (b) For existing units:
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 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, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

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

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

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.12 Instrument Specifications [326 IAC 2-1.1-11][326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than

twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

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

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

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

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

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

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system);
or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

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

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.

- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.16 Emission Statement [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

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 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.
 - (CC) Copies of all reports required by the FESOP.Records of required monitoring information include the following, where applicable:
 - (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

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

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-8-5(a)(1) by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

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

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:	
(a)	One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.
(b)	One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.
(c)	One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
(d)	Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
(e)	One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

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

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

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

Emission Unit	Control	PM Emission Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/ Bucket Conveyor (P-4)	Baghouse B-4	2.06

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

D.1.2 FESOP Limit [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following:

Emission Unit	Control	PM10 Limit (lbs/hr)	PM2.5 Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/Bucket Conveyor (P-4)	Baghouse B-4	2.06	2.06

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

D.1.3 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, the particulate matter (PM) from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C1- C5), and loadout hopper/bucket conveyor (P-4) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

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

A Preventive Maintenance Plan is required for these facilities and any 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 [326 IAC 2-8-4(1)]

D.1.5 Particulate Control

In order to assure compliance with Conditions D.1.1, D.1.2 and D.1.3, the baghouses for particulate control shall be in operation and control emissions from the rotary dryer (P-1), coke storage bin (P-2), coke sizing screen (P-3), coke conveyors (C-1 through C-5), and loadout hopper/bucket conveyor (P-4) at all times these facilities are in operation.

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

D.1.6 Testing Requirements

- (a) In order to demonstrate compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall perform PM and PM10 testing for baghouse B-1 and baghouse B-4 utilizing methods as approved by the Commissioner at least once every ten (10) years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM10 includes filterable and condensable PM.
- (b) In order to demonstrate compliance with Condition D.1.2, the Permittee shall perform PM2.5 testing on baghouse B-1 and baghouse B-4 utilizing methods as approved by the Commissioner, and in accordance with the following schedule:

- (a) Not later than September 25, 2017 the source shall perform initial testing for PM2.5.
- (b) Subsequent testing shall be performed at least once every ten (10) years from the date of the most recent valid compliance demonstration.

Testing shall be conducted in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C – Performance Testing contains the Permittee's obligation with regard to the performance testing required by this condition. PM2.5 includes filterable and condensable PM.

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

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of baghouses B-1 and B-4 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. 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.

D.1.8 Broken or Failed Bag Detection

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

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

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

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.7, the Permittee shall maintain records of daily visible emission notations of the baghouse(s) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).

- (b) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (f) One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:
- (1) One (1) receiving hopper, identified as P-5.
 - (2) One (1) screen, identified as P-5.
 - (3) One (1) covered conveyor, identified as C-6.

Insignificant Activities

- (a) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower: For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.
- (1) One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; with a maximum capacity of 21.6 tons per hour.
 - (2) One (1) wet coke conveyor, identified as C-0 with a maximum capacity of 21.6 tons per hour.
 - (4) One (1) coke crushing and screening operation, approved for construction in 2008, with a maximum capacity of 10 tons of coke (dry or wet) per hour, with particulate emissions controlled by a dust collector (B-5), and exhausting to stack S-5, consisting of the following:
 - (A) One (1) feed hopper, identified as P-6.
 - (B) One (1) coke crusher, identified as P-7.
 - (C) One (1) Rotex screener, identified as P-8.
 - (D) Four (4) conveyors, identified as C-7, C-8, C-9, and C-10, respectively.

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

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

D.2.1 Particulate Matter [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, the particulate matter (PM) from the receiving hopper (P-5), the screen (P-5), the covered conveyor (C-6), wet coke receiving hopper (P-0), the wet coke conveyor (C-0), feed hopper (P-6), coke crusher (P-7), coke screener (P-8), and conveyors (C-7, C-8, C-9, and C-10) shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan is required for these facilities and any 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 [326 IAC 2-8-4(1)]

D.2.3 Particulate Control

In order to assure compliance with Conditions D.2.1, the Permittee shall use wet suppression to control emissions of PM from the receiving hopper (P-5), the screen (P-5), and the covered conveyor (C-6), at all times the receiving hopper (P-5) the screen (P-5), and the covered conveyor (C-6) are in operation.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F089-37514-00360

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Date:

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

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

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F089-37514-00360

This form consists of 2 pages

Page 1 of 2

- | |
|---|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">• The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime 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 2-8-12 |
|---|

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

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

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
FESOP Permit No.: F089-37514-00360

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B -Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. 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	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attachment A

FUGITIVE DUST CONTROL PLAN

Source Name: RJR Drying, Inc.
Source Address: 3600 Canal Street, East Chicago, Indiana 46312
Owner/Operator/Facility Contact: John Sabol, Vice President
Ron Sabol, President

Fugitive Particulate Matter Sources:

- 1) (P-5) Vehicle Traffic (unpaved dirt/gravel roads within facility)
- 2) (P-0) Wet Coke Receiving Hopper
- 3) (C-0) Wet Coke Conveyor
- 4) Wet Coke Storage Pile
- 5) Dry Coke Storage Tank Entry

Annotated Map: See Attached

Vehicular Activity:

- 1) 18-Wheel Semi Dump Trucks @ 3 Round Trips/Day
- 2) Payloaders Conveying Wet Coke Material

Material/Quantity Handled: Wet Coke Material (18% Moisture Content),
~ 43,000 lbs/hr

Aggregate Piles: Wet Coke Storage Pile (18% Moisture Content),
Maintained by Payloaders to Conveyors

To ensure proper maintenance of unpaved roads, dust handling during vehicle transfer, and control of any fugitive emissions from coke storage tank loadout entry and aggregate piles, and ultimately in order to prohibit any violation of limitation emissions or potential to emit, the Fugitive Particulate Matter Emission Dust Control Plan shall be implemented for RJR Drying, Inc.

A) Responsibilities:

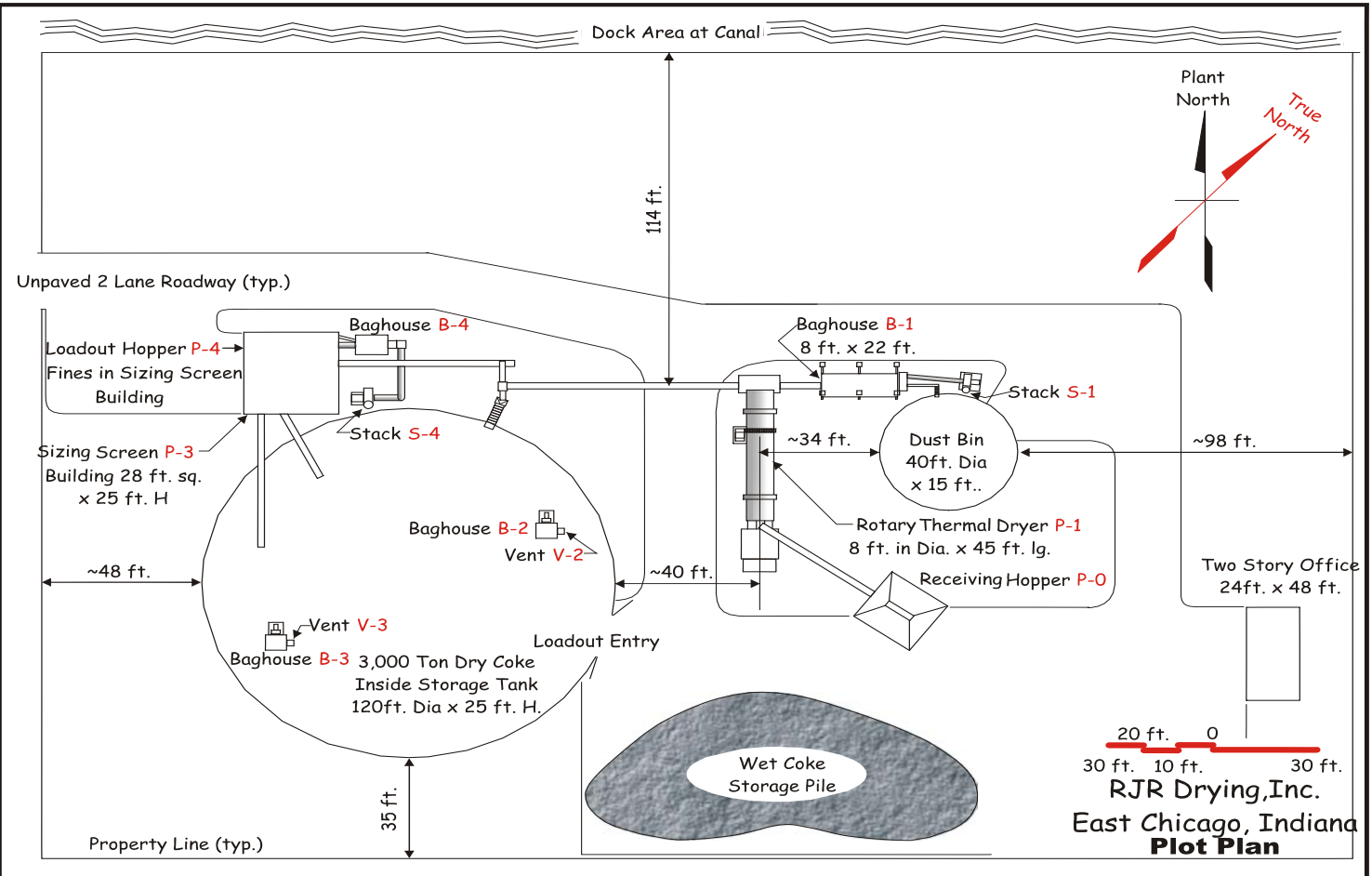
- 1) The Plant Manager will oversee the responsibility for inspecting roads, vehicles, coke storage tank entry and piles, maintaining their proper conditions, and implementing the Fugitive Dust Control Plan as needed and/or required.
- 2) Monitoring for visible emissions will be performed by employees who have worked at the facility for at least one (1) month and have been trained in the appearance/characteristics of normal visible emissions for a particular process.

B) Description of Control Measures:

- 1) Unpaved Roads - A 2,500 gallon tanker truck with a spray manifold applying a mixture of water and Nalco dust suppressant* will be applied to the roadway surfaces four (4) times per day. Dust suppression will be maintained on a regular basis except upon the event of precipitation. See Attachment 1. Visible emissions will be noted once per shift or upon use by traffic, and limitations will be maintained at <10% at all times. See Attachment 2.
- 2) Vehicle Transfer -
 - a) Semi-trucks conveying/transferring dry coke will be monitored once per shift or upon conveyance for visible emissions during handling and transfer at all times. Visible emission limitations will be maintained at 0%. See Attachment 2.
 - b) Payloaders transfer wet coke to the Receiving Hopper (P-0) which travels to the Wet Coke Conveyor (C-0). The wet coke has a natural suppressant of 18% moisture content. Visible emissions will be noted once per shift or upon conveyance and limitations will be maintained at <10% at all times. See Attachment 2.

- 3) Dry Coke Storage Tank - The dry coke storage tank is equipped with two (2) baghouses and two (2) vents. The baghouses will be maintained in order to control related emissions to the vents; the loadout entry will be monitored once per shift for emissions. Visible emission limitations from loadout entry will be maintained at 0%. See Attachment 2.
 - 4) Aggregate Piles - The wet coke storage pile has a natural suppressant in that it maintains at least an 18% moisture content. Visible emissions will be noted once per shift and limitations will be maintained at <10% at all times. See Attachment 2.
- C) Alternative Control Practices:
- 1) Certain conditions preventing control measures, such as a precipitation event and immediately following, would negate the use of chemical dust suppressant for roadways. Upon change in the weather, the dust suppression program would resume.
 - 2) Aside from facility shut-down, process-related shut-downs, lack of vehicle traffic, or inclement weather, monitoring for visible emissions will be performed on a regular basis.
 - 3) At any time that an abnormal emission-related incident occurs, the Agency will be notified within the required timely period.
- D) Schedule for Achievable Compliance:
Many aspects of the Fugitive Dust Control Plan, such as roadway dust suppression, are already in place. Monitoring in specific areas will be initiated in the immediate future, upon issuance of the pending FESOP permit; no schedule of compliance will be needed in order to implement this plan.
- E) Recordkeeping:
Records which document all control measures and activities to be implemented in accordance with the approved control plan shall be maintained at the facility.

RJR Drying, Inc. Plot Plan



Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	RJR Drying, Inc.
Source Location:	3600 Canal Street, East Chicago, Indiana 46312
County:	Lake
SIC Code:	5025 (Coal and Other Minerals and Ores)
Permit Renewal No.:	F089-37514-00360
Permit Reviewer:	Kristen Willoughby

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from RJR Drying, Inc. relating to the operation of a coke handling and drying plant. On August 15, 2016, RJR Drying, Inc. submitted an application to the OAQ requesting to renew its operating permit. RJR Drying, Inc. was issued its first FESOP Renewal F089-24599-000360 on August 1, 2017.

Source Definition

This Source Definition from the FESOP Renewal was incorporated into this permit as follows:

This coke handling facility consists of the following:

- (a) RJR Drying, Inc., the primary operation, owns and operates a stationary coke handling and drying plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00360);
- (b) Mid-Continent Coal and Coke Company, the supporting operation, owns and operates one (1) portable coke screening, sizing, and handling plant, located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-05057); and
- (c) American Terminal owns RJR Drying, Inc., located at 3600 Canal Street, East Chicago, Indiana 46312 (Plant ID # 089-00357).

These three (3) plants are considered one single source because they have a support relationship and are located on the same property, therefore they are considered one (1) major source, as defined by 326 IAC 2-7-1(22).

Separate FESOP will be issued to RJR Drying, Inc. and Mid-Continent Coal and Coke Company (American Terminal does not have an air permit) solely for administrative purposes. This conclusion was initially determined under FESOP F089-14838-00360 on January 13, 2003.

Mittal Steel (Plant ID 089-00316, formerly Ispat Inland, Inc.) is a steel mill which is located in the adjacent property. However, less than 50% of the coke received at this source is from Mittal Steel. Therefore, this source and Mittal Steel do not have a supporting relationship and are considered two (2) separate sources. This conclusion was initially determined under SSM 089-14296-05057, issued on November 10, 2003.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units:

- (a) One (1) natural gas-fired rotary dryer, identified as P-1, constructed in 1994, and modified in 2006, with a capacity of 18 MMBtu/hr and 43,200 pounds per hour, emissions controlled by a baghouse B-1, exhausting to stack S-1.
- (b) One (1) dry coke storage bin, identified as P-2, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (c) One (1) sizing screen, identified as P-3, constructed in 1994, with a maximum capacity of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (d) Five (5) coke conveyors, identified as C-1 through C-5, constructed in 1994, with maximum conveying capacities of 189,216 tons coke per year, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (e) One (1) loadout hopper/bucket conveyor, identified as P-4, constructed in 1994, with a maximum storage capacity of 3,000 tons, emissions controlled by a baghouse B-4, exhausting to vent V-4.
- (f) One (1) coke screening station, constructed in 1994, with a maximum capacity of 24 tons of coke (dry or wet) per hour, exhausting inside the building, consisting of the following:
 - (1) One (1) receiving hopper, identified as P-5.
 - (2) One (1) screen, identified as P-5.
 - (3) One (1) covered conveyor, identified as C-6.

Insignificant Activities

The source also consists of the following insignificant activities:

- (a) An emission unit or activity whose potential uncontrolled emissions meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in the following, whichever is lower: For PM10 or direct PM2.5, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.
 - (1) One (1) wet coke (coke with 18% moisture) receiving hopper, identified as P-0; with a maximum capacity of 21.6 tons per hour.
 - (2) One (1) wet coke conveyor, identified as C-0 with a maximum capacity of 21.6 tons per hour.
 - (3) One (1) wet coke storage pile.
 - (4) One (1) coke crushing and screening operation, approved for construction in 2008, with a maximum capacity of 10 tons of coke (dry or wet) per hour, with particulate emissions controlled by a dust collector (B-5), and exhausting to stack S-5, consisting of the following:
 - (A) One (1) feed hopper, identified as P-6.
 - (B) One (1) coke crusher, identified as P-7.

- (C) One (1) Rotex screener, identified as P-8.
 - (D) Four (4) conveyors, identified as C-7, C-8, C-9, and C-10, respectively.
- (b) Unpaved roads and parking lots with public access.

Existing Approvals

Since the issuance of the FESOP F089-24599-00360 on August 1, 2007, the source has constructed or has been operating under the following additional approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	089-25721-00360	January 22, 2008
Administrative Amendment	089-26030-00360	February 25, 2008
Minor Permit Revision	089-28119-00360	July 21, 2009
Administrative Amendment	089-28580-00360	October 30, 2009

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.

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	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 th 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 ₃	On June 11, 2012, the U.S. EPA designated Lake County nonattainment, for the 8-hour ozone standard. ¹²
PM _{2.5}	Unclassifiable or attainment effective February 6, 2012, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	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 ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.

Pollutant	Designation
	¹ 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 for the 1-hour standard.
	² The department has filed a legal challenge to U.S. EPA's designation in 77 FR 34228.

- (a) **Ozone Standards**
 U.S. EPA, in the Federal Register Notice 77 FR 112 dated June 11, 2012, has designated Lake County as nonattainment for ozone. On August 1, 2012, the air pollution control board issued an emergency rule adopting the U.S. EPA's designation. This rule became effective August 9, 2012. IDEM does not agree with U.S. EPA's designation of nonattainment. IDEM filed a suit against U.S. EPA in the U.S. Court of Appeals for the DC Circuit on July 19, 2012. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's designation. Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Therefore, VOC and NO_x emissions were evaluated pursuant to the requirements of Emission Offset, 326 IAC 2-3.
- (b) **PM_{2.5}**
 Lake County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

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

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Unrestricted Potential Emissions	
Pollutant	Tons/year
PM	>250
PM ₁₀	>250
PM _{2.5}	>250
SO ₂	<100

Unrestricted Potential Emissions	
Pollutant	Tons/year
NO _x	<100
VOC	<100
CO	<100
Single HAP	<10
Total HAP	<25

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

On June 23, 2014, in the case of *Utility Air Regulatory Group v. EPA*, cause no. 12-1146, (available at http://www.supremecourt.gov/opinions/13pdf/12-1146_4g18.pdf) the United States Supreme Court ruled that the U.S. EPA does not have the authority to treat greenhouse gases (GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(30)) of PM10 and PM2.5 is equal to or greater than 100 tons per year. However, the Permittee has agreed to limit the source's PM10 and PM2.5 emissions to less than Title V levels, therefore the Permittee will be issued a FESOP Renewal.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(30)) of all other criteria pollutants are less than 100 tons per year.
- (c) The potential to emit (as defined in 326 IAC 2-7-1(30)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(30)) of a combination of HAPs is less than twenty-five (25) tons per year.

Actual Emissions

The following table shows the actual emissions as reported by the source. This information reflects the 2014 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM ₁₀	2
PM _{2.5}	1
SO ₂	0
NO _x	7
VOC	1
CO	1

Potential to Emit After Issuance

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

Process/ Emission Unit	Potential To Emit of the Entire Source After Issuance of Renewal (tons/year)								
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP (Hexane)
Rotary Dryer (P-1)	13.53	13.53	13.53	0.05	7.73	0.43	6.49	0.15	0.14
Storage, Screening, Conveying, & Loadout (P-2 through P-4, C-1 through C-5)	9.02	9.02	9.02	-	-	-	-	-	-
Screening, Conveying, Crushing (P-5 through P-8, C-6 through C-10)	35.02	9.00	8.60	-	-	-	-	-	-
Total Mid-Continent Coal and Coke Company (089-05057)	2.41	2.41	2.41	2.24	33.95	2.75	7.31	0.03	-
Total PTE of Entire Source	59.99	33.97	33.57	2.29	41.68	3.18	13.80	0.18	0.14
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset Major Source Thresholds	NA	NA	NA	NA	100	100	NA	NA	NA
negl. = negligible * Under the Part 70 Permit program (40 CFR 70), PM10 and PM2.5, not particulate matter (PM), are each considered as a "regulated air pollutant". **PM _{2.5} listed is direct PM _{2.5} .									

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(GHGs) as an air pollutant for the purpose of determining operating permit applicability or PSD Major source status. On July 24, 2014, the U.S. EPA issued a memorandum to the Regional Administrators outlining next steps in permitting decisions in light of the Supreme Court's decision. U.S. EPA's guidance states that U.S. EPA will no longer require PSD or Title V permits for sources "previously classified as 'Major' based solely on greenhouse gas emissions."

The Indiana Environmental Rules Board adopted the GHG regulations required by U.S. EPA at 326 IAC 2-2-1(zz), pursuant to Ind. Code § 13-14-9-8(h) (Section 8 rulemaking). A rule, or part of a rule, adopted under Section 8 is automatically invalidated when the corresponding federal rule, or part of the rule, is invalidated. Due to the United States Supreme Court Ruling, IDEM, OAQ cannot consider GHGs emissions to determine operating permit applicability or PSD applicability to a source or modification.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is not a major stationary source under Emission Offset (326 IAC 2-3) because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or more.
- (c) These emissions are based upon Appendix A of this Technical Support Document.
- (d) This existing source is not a major source of HAPs, as defined in 40 CFR 63.2, because HAPs emissions are less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA).

Federal Rule Applicability

CAM:

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

NSPS:

40 CFR 60, Subpart OOO - of Performance for Nonmetallic Mineral Processing Plants

The requirements of the New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR 60, Subpart OOO (326 IAC 12), are not included in the permit, since the definition of a nonmetallic mineral in 40 CFR 60.671 does not include metallurgical coke.

NESHAP:

There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

326 IAC 2-8-4 (FESOP)

Pursuant to 326 IAC 2-8-4 (FESOP) and in order to render the requirements of 326 IAC 2-2 (PSD) not applicable, the Permittee shall comply with the following:

Emission Unit	Control	PM ₁₀ Limit (lbs/hr)	PM _{2.5} Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/Bucket Conveyor (P-4)	Baghouse B-4	2.06	2.06

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

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

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

Emission Unit	Control	PM Emission Limit (lbs/hr)
Rotary Dryer (P-1)	Baghouse B-1	3.09
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/ Bucket Conveyor (P-4)	Baghouse B-4	2.06

Compliance with this limit, in conjunction with the potential to emit PM from all other emission units, shall limit the PM emissions from the entire source to less than two-hundred fifty (250) tons per twelve (12) consecutive month period and will render the requirements of 326 IAC 2-2 (PSD) not applicable.

326 IAC 2-3 (Emission Offset)

The uncontrolled VOC and NO_x emissions are less than 100 tons per year each. Therefore, the source is not a major source for Emission Offset for ozone.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

This source is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs from the source is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because while it is located in Lake County, its emissions of VOC and NO_x are less than 25 tons per year. Therefore, this rule does not apply.

326 IAC 5-1 (Opacity Limitations)

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

326 IAC 6-4 (Fugitive Dust Emissions Limitations)

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the attached plan as in Attachment A. The provisions of 326 IAC 6-5 are not federally enforceable.

326 IAC 6.5 PM Limitations Except Lake County

This source is not subject to 326 IAC 6.5 because it is not located in one of the following counties: Clark, Dearborn, Dubois, Howard, Marion, St. Joseph, Vanderburgh, Vigo or Wayne.

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 (or limited PM PTE) is equal to or greater than 100 tons/year or actual emissions are greater than 10 tons/year. However, this source is not one of the sources specifically listed in 326 IAC 6.8-2. Therefore, 326 IAC 6.8-1-2(a) applies.

326 IAC 6.8-10-3 (Fugitive Particulate Matter Emissions)

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 PM₁₀ 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 PM₁₀ 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.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

This rule applies to all emission units with a potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide. None of the emission units located at this source have a potential to emit 25 tons per year or more of sulfur dioxide. Therefore, this rule does not apply.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 8-4. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet

Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

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

- (a) The Rotary Dryer (P-1), Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), and Loadout Hopper/ Bucket Conveyor (P-4) have applicable compliance determination conditions as specified below:

Emission Unit	Control Device	Timeframe for Testing	Pollutant	Frequency of Testing
Rotary Dryer (P-1)	Baghouse B-1	10 years from last valid test	PM, PM10	Once every 10 years
		Not later than September 25, 2017	PM2.5	Once every 10 years
Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), Loadout Hopper/ Bucket Conveyor (P-4)	Baghouse B-4	10 years from last valid test	PM, PM10	Once every 10 years
		Not later than September 25, 2017	PM2.5	Once every 10 years

*The testing time frame was originally established as part of F089-24599-00360.

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

Control	Parameter	Frequency	Range	Excursions and Exceedances
Baghouse B-1	Visible Emissions	Daily	Normal-Abnormal	Response Steps
Baghouse B-4	Visible Emissions	Daily	Normal-Abnormal	Response Steps

These monitoring conditions are necessary because the baghouses for the Rotary Dryer (P-1), Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Coke Conveyors (C1-C5), and Loadout Hopper/ Bucket Conveyor (P-4) must operate properly to ensure compliance with 326 IAC 6.8 (Particulate Matter), 326 IAC 2-2 (PSD), and 326 IAC 2-8 (FESOP).

- (b) The receiving hopper (P-5), the screen (P-5), and the covered conveyor (C-6) have applicable compliance determination conditions as specified below:

The Permittee shall use wet suppression to control emissions of PM from the receiving hopper (P-5), the screen (P-5), and the covered conveyor (C-6), at all times the receiving hopper (P-5) the screen (P-5), and the covered conveyor (C-6) are in operation.

Recommendation

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

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

An application for the purposes of this review was received on August 15, 2016.

Conclusion

The operation of this coke handling and drying plant shall be subject to the conditions of the attached FESOP Renewal No. F089-37514-00360.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Kristen Willoughby 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) 233-3031 or toll free at 1-800-451-6027 extension 3-3031.
- (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 Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emission Calculations
PTE Summary**

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: Kristen Willoughby

Emission Unit	Uncontrolled Potential to Emit (tons/yr)							Total HAPs
	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	
Rotary Dryer (P-1)	315.36	315.36	315.36	0.05	7.73	0.43	6.49	0.15
Storage, Screening, Conveying, & Loadout (P-2 through P-4, C-1 through C-5)	210.24	210.24	210.24	-	-	-	-	-
Screening, Conveying, Crushing (P-5 through P-8, C-6 through C-10)	35.02	9.00	8.60	-	-	-	-	-
Total RJR Drying, Inc.	560.62	534.60	534.20	0.05	7.73	0.43	6.49	0.15
Total Mid-Continent Coal and Coke Company (F089-31072-05057) **	2.41	2.41	2.41	2.24	33.95	2.75	7.31	0.03
Total Source	563.03	537.01	536.61	2.29	41.68	3.18	13.80	0.18
<i>Fugitive Emissions</i>								
Feed Hopper and Conveyor (P-0, C-0)	1.12	0.51	0.26	-	-	-	-	-
Storage and Handling	0.36	0.31	0.27	-	-	-	-	-
Unpaved Roads	10.51	2.80	0.28	-	-	-	-	-
Total Fugitives RJR Drying, Inc.	11.99	3.62	0.80	-	-	-	-	-
Total Mid-Continent Coal and Coke Company (089-05057)	44.18	14.43	3.31	-	-	-	-	-
Total Source	56.17	18.05	4.11	-	-	-	-	-

* PM2.5 listed is direct PM2.5

Emission Unit	Potential to Emit after Control (tons/yr)							Total HAPs
	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	
Rotary Dryer (P-1)	3.15	3.15	3.15	0.05	7.73	0.43	6.49	0.15
Storage, Screening, Conveying, & Loadout (P-2 through P-4, C-1 through C-5)	2.10	2.10	2.10	-	-	-	-	-
Screening, Conveying, Crushing (P-5 through P-8, C-6 through C-10)	34.74	9.90	9.50	-	-	-	-	-
Total RJR Drying, Inc.	39.99	15.16	14.76	0.05	7.73	0.43	6.49	0.15
Total Mid-Continent Coal and Coke Company (F089-31072-05057) **	2.41	2.41	2.41	2.24	33.95	2.75	7.31	0.03
Total Source	42.40	17.57	17.17	2.29	41.68	3.18	13.80	0.18

* PM2.5 listed is direct PM2.5

Emission Unit	Potential to Emit after Issuance (tons/yr)							Total HAPs
	PM	PM10	PM2.5 *	SO ₂	NOx	VOC	CO	
Rotary Dryer (P-1)	13.53	13.53	13.53	0.05	7.73	0.43	6.49	0.15
Storage, Screening, Conveying, & Loadout (P-2 through P-4, C-1 through C-5)	9.02	9.02	9.02	-	-	-	-	-
Screening, Conveying, Crushing (P-5 through P-8, C-6 through C-10)	35.02	9.00	8.60	-	-	-	-	-
Total RJR Drying, Inc.	57.58	31.56	31.16	0.05	7.73	0.43	6.49	0.15
Total Mid-Continent Coal and Coke Company (F089-31072-05057) **	2.41	2.41	2.41	2.24	33.95	2.75	7.31	0.03
Total Source	59.99	33.97	33.57	2.29	41.68	3.18	13.80	0.18

* PM2.5 listed is direct PM2.5

Note: The shaded cells indicate where limits are included.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
Rotary Dryer P-1**

**Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: Kristen Willoughby**

Heat Input Capacity MMBtu/hr	HHV mmBtu mmscf	Potential Throughput MMCF/yr
18.0	1020	154.6

Emission Factor in lb/MMCF	Pollutant			
	SO ₂	NO _x	VOC	CO
	0.6	100 **see below	5.5	84
Potential Emission in tons/yr	0.05	7.73	0.43	6.49

*PM/PM10/PM2.5 emissions included in the process emission calculations on the next page.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Hazardous Air Pollutants (HAPs)

	HAPs - Organics					Total - Organics
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene	
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03	
Potential Emission in tons/yr	1.6E-04	9.3E-05	5.8E-03	0.14	2.6E-04	0.15

	HAPs - Metals					Total - Metals
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	
Potential Emission in tons/yr	3.9E-05	8.5E-05	1.1E-04	2.9E-05	1.6E-04	4.2E-04
					Total HAPs	0.15
					Worst HAP	0.14

Methodology is the same as above.

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculation
For Dry Coke Storage Bin (P-2), Sizing Screen (P-3), Conveyors (C1-C5), and Loadout
Hopper/ Bucket Conveyor (P-4)**

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: Kristen Willoughby

Unit ID	Control Device ID	Grain Loading (gr/acf)	Air Flow (acfm)	Control Efficiency (%)	Potential to Emit PM/PM10/PM2.5		Controlled PM/PM10/PM2.5		Limited Emissions (tpy)		
					(lb/hr)	(tpy)	(lb/hr)	(tpy)	PM	PM10	PM2.5
P-1	B-1	0.007	12000	99%	72.00	315.36	0.72	3.15	13.53	13.53	13.53
P-2, P-3, P-4, C-1 through C-5	B-4	0.007	8000	99%	48.00	210.24	0.48	2.10	9.02	9.02	9.02
Total					525.60		5.26		22.56	22.56	22.56

Methodology:

Controlled Emissions (lbs/hr) = Grain Loading (gr/acf) X 1lb/7000gr X Air Flow (acfm) X 60 (min/hr)

Controlled Emissions (tons/yr) = Controlled Emissions (lbs/hr) X 8760 (hr/yr) X 1 ton/ 2000 lbs.

Uncontrolled Emissions (lbs/hr) = Controlled Emissions (lbs/hr) / (1 - Control Efficiency (%))

Uncontrolled Emissions (tpy) = Controlled Emissions (tpy) / (1 - Control Efficiency (%))

Limited Emissions (tpy) = Limited Emissions from Permit (lb/hr) X 8760 (hr/yr) X 1 ton/ 2000 lbs.

Appendix A: Emission Calculations
Emissions From the Crushing, Conveying, and Screening Operations

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: ERG/ST

Emission Unit Description [ID #] (SCC Code)	Number of Units	Max Throughput (ton/hr)	Emission Factor (lbs/ton)			PTE Before Controls (tpy)			Grain Loading (gr/acf)	Air Flow (acfm)	PTE After Controls (tpy)		
			PM	PM10	PM2.5	PM	PM10	PM2.5			PM	PM10	PM2.5
Feed Hopper [P-5] (SCC 3-03-008-05) *	1	24	0.0088	0.0043	0.0016	0.93	0.45	0.17	NA	NA	0.93	0.45	0.17
Screen [P-5] (SCC 3-05-020-21) **	1	24	0.3	0.0720	0.0720	31.54	7.57	7.57	NA	NA	31.54	7.57	7.57
Conveyor [C-6] (SCC 3-05-020-06) **	1	24	0.003	0.0011	0.0011	0.32	0.12	0.12	NA	NA	0.32	0.12	0.12
Feed Hopper [P-6] (SCC 3-03-008-05) *	1	10	0.0088	0.0043	0.0016	0.39	0.19	0.07	NA	NA	0.39	0.19	0.07
Coke Crusher [P-7] (SCC 3-05-030-03) **	1	10	0.0054	0.0024	0.0024	0.24	0.11	0.11	0.007	6000	1.58	1.58	1.58
Screen [P-8] (SCC 3-05-020-02) **	1	10	0.025	0.0087	0.0087	1.10	0.38	0.38					
Conveyors [C-7, C-8, C-9, C-10] (SCC 3-05-020-06) **	4	10	0.003	0.0011	0.0011	0.53	0.19	0.19					
Total						35.02	9.00	8.60			34.74	9.90	9.50

* The emission factors for the feed hopper are the emission factors for low silt batch drop in AP-42, Chapter 12.5, Table 12.5-4 for iron and steel mill 10/96.

** The emission factors for the crusher, screen, and conveyor are from AP-42, Chapter 11.19.2, Table 11.19.2-2 for crushed stone processing operations (08/04).

Coke is quenched in water after removal from coke ovens. The coke is then delivered directly to RJR Drying's crushing and screening facility. Although the raw coke is high moisture (10 % or greater) when it arrives onsite, the processing in the crusher will expose dry surfaces on the coke. Therefore, the uncontrolled emission factors in AP 42, Chapter 11.19.2, Table 11.19.2-2 are used here because the material, after processing in the crusher, may be considered dry material.

Methodology

PTE of PM/PM10 Before Controls (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x Number of Units x 8,760 hrs/yr x 1 ton/2000 lbs

Controlled Emissions (tpy) = Grain Loading (gr/acf) X 1lb/7000gr X Air Flow (acfm) X 60 (min/hr) X 8760 (hr/yr) X 1 ton/ 2000 lbs.

Appendix A: Emission Calculations
Emissions From the Feed Hopper and Conveyor Operations

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: ERG/ST

Emission Unit Description [ID #] (SCC Code)	Number of Units	Max Throughput (ton/hr)	Emission Factor (lbs/ton)			PTE Before Controls (tpy)		
			PM	PM10	PM2.5	PM	PM10	PM2.5
Feed Hopper [P-0] (SCC 3-03-008-05) *	1	21.6	0.0088	0.0043	0.0016	0.83	0.41	0.15
Conveyor [C-0] (SCC 3-05-020-06) **	1	21.6	0.003	0.0011	0.0011	0.28	0.10	0.10
Total						1.12	0.51	0.26

* The emission factors for the feed hopper are the emission factors for low silt batch drop in AP-42, Chapter 12.5, Table 12.5-4 for iron and steel mill 10/96.

** The emission factors for the crusher, screen, and conveyor are from AP-42, Chapter 11.19.2, Table 11.19.2-2 for crushed stone processing operations (08/04).

Methodology

PTE of PM/PM10 Before Controls (tons/yr) = Maximum Throughput Rate (tons/hr) x Emission Factor (lbs/ton) x Number of Units x 8,760 hrs/yr x 1 ton/2000 lbs

**Appendix A: Emission Calculations
Emissions from Storage Piles and Coke Handling**

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: Kristen Willoughby

1. Fugitive Emissions from Coke Storage Piles

Storage pile emissions, which result from wind erosion, are determined by the following calculations:

$$\text{Emission Factor} = 1.7 (s/1.5) ((365-p) / 235) (f/15)$$

$$= 5.67 \text{ lb/ac/day}$$

where:	s =	4.9	% silt content of material
	p =	125	days of rain greater than or equal to 0.01 inches
	f =	15	% of wind greater than or equal to 12 mph

$$\text{Storage capacity (SC) of site (tons)} = 0.25 \text{ acres} \times 43,560 \text{ sqft/acre} \times 25 \text{ ft high} \times 1 \text{ ton}/40 \text{ cubic ft}$$

$$\text{Storage capacity (SC) of site (tons)} = 6,806$$

$$\text{PTE of PM/PM}_{10}/\text{PM}_{2.5} \text{ (tons/year)} = \text{Emission Factor (lb/acre/day)} \times \text{Storage Capacity (tons)} \times \text{Density (40 cuft/ton)} \times 365 \text{ days/year} \times 1 \text{ ton}/2,000 \text{ lbs} \times 43,560 \text{ sqft/acre} \times \text{Height 25 ft}$$

Controlled PTE of PM/PM₁₀/PM_{2.5} (tons/year) = 0.26 **Controlled PTE of PM/PM₁₀/PM_{2.5} * (tons/year) = 0.13**

* The permittee plans to control fugitive emissions by watering the storage piles. This control is estimated to reduce particulate emissions by 50%.

2. Storage Pile (Material) Handling

Emissions are generated each time the material is handled. Exclusive of conveying operations, coke is handled three (3) times: when it is dumped from trucks, when it is loaded into the feed hopper of the screening machine, and when the finished coke is loaded into trucks. According to AP 42, Chapter 13.2.4, emissions from material handling are calculated as follows:

$$\text{Emission Factor (lb/ton)} = k (0.0032) (U/5)^{1.3} / (M/2)^{1.4}$$

where:

k value for PM =	0.74	
k value for PM _{2.5} =	0.35	
k value for PM ₁₀ =	0.053	
U value =	12	mph
M value =	10	%
Material Throughput =	87,600	tons/yr

Annual Throughput (tons/yr)	87,600
------------------------------------	---------------

PM EF =	7.76E-04	lb/ton
PM ₁₀ EF =	3.67E-04	lb/ton
PM _{2.5} EF =	5.56E-05	lb/ton

Uncontrolled PTE of PM (tons/year) =	0.10
Uncontrolled PTE of PM₁₀ (tons/year) =	0.05
Uncontrolled PTE of PM_{2.5} (tons/year) =	0.01

The permittee plans to control fugitive emissions by watering the storage piles. This control is estimated to reduce particulate emissions by 50%.

Controlled PTE of PM * (tons/year) =	0.05
Controlled PTE of PM₁₀ * (tons/year) =	0.02
Controlled PTE of PM_{2.5} * (tons/year) =	3.65E-03

Methodology

$$\text{Uncontrolled PTE of PM/PM}_{10} \text{ (tons/year)} = \text{Emission Factor (lb/ton)} \times \text{Limited Annual Throughput (tons/yr)} \times 1 \text{ ton}/2,000 \text{ lbs} \times 3$$

$$\text{Controlled PTE of PM/PM}_{10} \text{ (tons/year)} = \text{Emission Factor (lb/ton)} \times \text{Limited Annual Throughput (tons/yr)} \times 1 \text{ ton}/2,000 \text{ lbs} \times 3 \times 50\% \text{ Control Efficiency}$$

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads

Company Name: RJR Drying, Inc.
Address City IN Zip: 3600 Canal Street, East Chicago, IN 46312
FESOP Renewal No.: F089-37514-00360
Reviewer: Kristen Willoughby

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Truck (entering plant) (one-way trip)	24.0	1.0	24.0	15.0	360.0	500	0.095	2.3	829.5
Truck (leaving plant) (one-way trip)	24.0	1.0	24.0	15.0	360.0	500	0.095	2.3	829.5
Truck (entering or leaving plant) (one-way trip)	24.0	1.0	24.0	26.25	630.0	1800	0.341	8.2	2987.2
Totals			72.0		1350.0			12.7	4646.3

Average Vehicle Weight Per Trip = 18.8 tons/trip
Average Miles Per Trip = 0.18 miles/trip

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

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	6.0	6.0	6.0	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Iron and Steel Production)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	18.8	18.8	18.8	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, $E_{ext} = E_f \cdot [(365 - P)/365]$
where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, $E_f =$	6.88	1.83	0.18	lb/mile
Mitigated Emission Factor, $E_{ext} =$	4.52	1.21	0.12	lb/mile
Dust Control Efficiency =	50%	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10 (tons/yr)	Controlled PTE of PM2.5 (tons/yr)
Truck (entering plant) (one-way trip)	2.85	0.76	0.08	1.88	0.50	0.05	0.94	0.25	0.03
Truck (leaving plant) (one-way trip)	2.85	0.76	0.08	1.88	0.50	0.05	0.94	0.25	0.03
Truck (entering or leaving plant) (one-way trip)	10.28	2.74	0.27	6.76	1.80	0.18	3.38	0.90	0.09
Totals	15.98	4.26	0.43	10.51	2.80	0.28	5.26	1.40	0.14

Methodology

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

Abbreviations

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



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 13, 2016

John Sabol
RJR Drying, Inc.
3600 Canal St
East Chicago, IN 46312

Re: Public Notice
RJR Drying, Inc.
Permit Level: FESOP - Renewal
Permit Number: 089 - 37514 - 00360

Dear John Sabol:

Enclosed is a copy of your draft FESOP - Renewal, Technical Support Document, emission calculations, and the Public Notice which will be printed in your local newspaper.

The Office of Air Quality (OAQ) has prepared two versions of the Public Notice Document. The abbreviated version will be published in the newspaper, and the more detailed version will be made available on the IDEM's website and provided to interested parties. Both versions are included for your reference. The OAQ has requested that the Post Tribune in Merrillville, IN, and The Times in Munster, IN publish the abbreviated version of the public notice no later than September 16, 2016. You will not be responsible for collecting any comments, nor are you responsible for having the notice published in the newspaper.

OAQ has submitted the draft permit package to the East Chicago Public Library, 1008 W. Chicago Ave. in East Chicago IN. As a reminder, you are obligated by 326 IAC 2-1.1-6(c) to place a copy of the complete permit application at this library no later than ten (10) days after submittal of the application or additional information to our department. We highly recommend that even if you have already placed these materials at the library, that you confirm with the library that these materials are available for review and request that the library keep the materials available for review during the entire permitting process.

Please review the enclosed documents carefully. This is your opportunity to comment on the draft permit and notify the OAQ of any corrections that are needed before the final decision. Questions or comments about the enclosed documents should be directed to Kristen (Layton) Willoughby, Indiana Department of Environmental Management, Office of Air Quality, 100 N. Senate Avenue, Indianapolis, Indiana, 46204 or call (800) 451-6027, and ask for extension 3-3031 or dial (317) 233-3031.

Sincerely,
Len Pogost

Len Pogost
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover letter 2/17/2016



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Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

September 12, 2016

The Post Tribune
Attn: Classifieds
1433 E 83rd Avenue
Merrillville, IN 46410

and

The Times
Attn: Classifieds
601 W 45th Avenue
Munster, IN 46321

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for RJR Drying, Inc., Lake County, Indiana.

Since our agency must comply with requirements which call for a Notice of Public Comment, we request that you print this notice one time, no later than September 16, 2016.

Please send a notarized form, clippings showing the date of publication, and the billing to the Indiana Department of Environmental Management, Accounting, Room N1345, 100 North Senate Avenue, Indianapolis, Indiana, 46204.

To ensure proper payment, please reference account # 100174737.

We are required by the Auditor's Office to request that you place the Federal ID Number on all claims. If you have any conflicts, questions, or problems with the publishing of this notice or if you do not receive complete public notice information for this notice, please call Len Pogost at 800-451-6027 and ask for extension 3-2803 or dial 317-233-2803.

Sincerely,

Len Pogost

Len Pogost
Permit Branch
Office of Air Quality

Permit Level: FESOP - Renewal
Permit Number: 089 - 37514 - 00360

Enclosure



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

September 13, 2016

To: East Chicago Public Library 1008 W. Chicago Ave. East Chicago IN

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

Subject: **Important Information to Display Regarding a Public Notice for an Air Permit**

Applicant Name: RJR Drying, Inc.
Permit Number: 089 - 37514 - 00360

Enclosed is a copy of important information to make available to the public. This proposed project is regarding a source that may have the potential to significantly impact air quality. Librarians are encouraged to educate the public to make them aware of the availability of this information. The following information is enclosed for public reference at your library:

- Notice of a 30-day Period for Public Comment
- Request to publish the Notice of 30-day Period for Public Comment
- Draft Permit and Technical Support Document

You will not be responsible for collecting any comments from the citizens. Please refer all questions and request for the copies of any pertinent information to the person named below.

Members of your community could be very concerned in how these projects might affect them and their families. **Please make this information readily available until you receive a copy of the final package.**

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. Questions pertaining to the permit itself should be directed to the contact listed on the notice.

Enclosures
PN Library.dot 2/16/2016



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Michael R. Pence
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Carol S. Comer
Commissioner

Notice of Public Comment

September 13, 2016
RJR Drying, Inc.
089 - 37514 - 00360

Dear Concerned Citizen(s):

You have been identified as someone who could potentially be affected by this proposed air permit. The Indiana Department of Environmental Management, in our ongoing efforts to better communicate with concerned citizens, invites your comment on the draft permit.

Enclosed is a Notice of Public Comment, which has been placed in the Legal Advertising section of your local newspaper. The application and supporting documentation for this proposed permit have been placed at the library indicated in the Notice. These documents more fully describe the project, the applicable air pollution control requirements and how the applicant will comply with these requirements.

If you would like to comment on this draft permit, please contact the person named in the enclosed Public Notice. Thank you for your interest in the Indiana's Air Permitting Program.

Please Note: *If you feel you have received this Notice in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV. If you have recently moved and this Notice has been forwarded to you, please notify us of your new address and if you wish to remain on the mailing list. Mail that is returned to IDEM by the Post Office with a forwarding address in a different county will be removed from our list unless otherwise requested.*

Enclosure
PN AAA Cover.dot 2/17/2016


Mail Code 61-53

IDEM Staff	LPOGOST 9/13/2016 R J R Drying, Inc. 089 - 37514 - 00360 draft/		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		John Sabol R J R Drying, Inc. 3600 Canal St East Chicago IN 46312 (Source CAATS)										
2		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
3		East Chicago Public Library 1008 W. Chicago Ave. East Chicago IN 46312 (Library)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Lowell Town Council and Town Manager PO Box 157, 501 East Main Street Lowell IN 46356 (Local Official)										
7		Shawn Sobocinski 1814 Laporte Street Portage IN 46368-1217 (Affected Party)										
8		Mr. Dennis Hahney Pipefitters Association, Local Union 597 1461 East Summit St Crown Point IN 46307 (Affected Party)										
9		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
10		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
11		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
12		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										
13		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
14		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
15		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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Mail Code 61-53

IDEM Staff	LPOGOST 9/12/2016 R J R Drving, Inc. 37514 (draft/final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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											Remarks
1		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
2		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)									
3		Ryan Dave 939 Cornwallis Munster IN 46321 (Affected Party)									
4		Gerald & Donna Roessing GADabout LTD., Inc. 4953 Cleveland Street Gary IN 46408-4363 (Consultant)									
5		Mark Coleman PO Box 85 Beverly Shores IN 46301-0085 (Affected Party)									
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