



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

NOTICE OF 30-DAY PERIOD FOR PUBLIC COMMENT

Preliminary Findings Regarding a
Significant Modification to a
Part 70 Operating Permit

for Lehigh Cement Company LLC in Cass County

Significant Source Modification No.: 017-39447-00005
Significant Permit Modification No.: 017-39455-00005

The Indiana Department of Environmental Management (IDEM) has received an application from Lehigh Cement Company LLC, located at 3084 West CR 225 South, Logansport, Indiana 46947, for a significant modification of its Part 70 Operating Permit issued on November 15, 2016. If approved by IDEM's Office of Air Quality (OAQ), this proposed modification would allow Lehigh Cement Company LLC to make certain changes at its existing source. Lehigh Cement Company LLC has applied to incorporate in the permit the provisions of third modification to consent decree No. 2:11-cv-016520-DSC.

This draft Significant Source Modification and Significant Permit Modification do 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. 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:

Logansport Cass County Public Library
616 East Broadway
Logansport, IN 46947

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

A copy of the preliminary findings is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

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 SSM 017-39447-00005 and SPM 017-39455-00005 in all correspondence.

Comments should be sent to:

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(800) 451-6027, ask for extension (2 or 3-3838)
Or dial directly: (317) 233-6868
Fax: (317)-232-6749 attn: Mehul Sura
E-mail: msura@IDEM.IN.gov

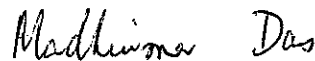
All comments will be considered by IDEM when we make a decision to issue or deny the permit. Comments that are most likely to affect final permit decisions are those based on the rules and laws governing this permitting process (326 IAC 2), air quality issues, and technical issues. IDEM does not have 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 Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.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, 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 Mehul Sura or my staff at the above address.



Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality



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Commissioner

DRAFT

Stephen Roosz
Lehigh Cement Company LLC
3084 W CR 225 South
Logansport, IN, 46947-8476

Re: 017-39455-00005
Significant Permit Modification

Dear Stephen Roosz:

Lehigh Cement Company LLC was issued a Part 70 Permit Renewal No. 017-35434-00005 on November 15, 2016, for a stationary portland cement manufacturing plant located at 3084 West County Road 225 South, Logansport, Indiana 46947. An application requesting changes to this permit was received on December 22, 2017. Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachment(s). Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A - 40 CFR 61, Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources)
- Attachment B - 40 CFR 61, Subpart FF, National Emission Standard for Benzene Waste Operations
- Attachment C - 40 CFR 63, Subpart DD, National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations
- Attachment D - 40 CFR 63, Subpart EEE, National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors
- Attachment E - 40 CFR 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry
- Attachment F - 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Previously issued approvals for this source are also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

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A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. A copy of the permit is also available via IDEM's Virtual File Cabinet (VFC.) Please go to: <http://www.in.gov/idem/> and enter VFC in the search box. You will then have the option to search for permit documents using a variety of criteria. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions regarding this matter, please contact Mehul Sura, 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) 233-6868 or (800) 451-6027, and ask for Mehul Sura or (317) 233-6868.

Sincerely,

Madhurima D. Moulik, Ph.D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Modified Permit and Technical Support Document

cc: File - Cass County
Cass County Health Department
U.S. EPA, Region 5
Compliance and Enforcement Branch



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Part 70 Operating Permit Renewal OFFICE OF AIR QUALITY

**Lehigh Cement Company LLC
3084 West CR 225 South
Logansport, Indiana 46947**

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

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

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

Operation Permit No. T017-35434-00005	
Issued by: Signed by: Nathan C. Bell, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 15, 2016 Expiration Date: November 15, 2021

Administrative Amendment No. 017-37759-00005, Issued on December 30, 2016

Administrative Amendment No. 017-38491-00005, Issued on May 16, 2017

Significant Permit Modification No. 017-38455-00005	
Issued by: Madhurima D. Moulik, Ph.D., Section Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date: November 15, 2021

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	6
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.4	Other Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]	
A.5	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	23
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7] [IC 13-17-12]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.16	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.17	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.18	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.19	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.20	Source Modification Requirement [326 IAC 2-7-10.5]	
B.21	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.22	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.23	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.24	Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	34
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	34
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Stack Height [326 IAC 1-7]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	34
C.8	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	35
C.9	Compliance Requirements [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	35
C.10	Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]	

C.11	Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]	
	Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]	36
C.12	Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]	
C.13	Risk Management Plan [326 IAC 2-7-5(11)] [40 CFR 68]	
C.14	Response to Excursions or Exceedances [40 CFR 64] [326 IAC 3-8] [326 IAC 2-7-5] [326 IAC 2-7-6]	
C.15	Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	39
C.16	Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]	
C.17	General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]	
C.18	General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64] [326 IAC 3-8]	
	Stratospheric Ozone Protection	42
C.19	Compliance with 40 CFR 82 and 326 IAC 22-1	
SECTION D.1	EMISSIONS UNIT OPERATION CONDITIONS.....	43
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	50
D.1.1	Particulate Emissions [326 IAC 6-3-2]	
D.1.2	PSD Minor Limits [326 IAC 2-2]	
D.1.3	Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
	Compliance Determination Requirements [326 IAC 2-7-5(1)]	53
D.1.4	Particulate Control	
D.1.5	Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	54
D.1.6	Visible Emissions Notations [40 CFR 64]	
D.1.7	Parametric Monitoring [40 CFR 64]	
D.1.8	Broken or Failed Bag Detection	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	56
D.1.9	Record Keeping Requirements	
SECTION D.2	EMISSIONS UNIT OPERATION CONDITIONS.....	58
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	58
D.2.1	Sulfur Dioxide (SO ₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]	
D.2.2	Sulfur Dioxide (SO ₂) Emission Limitation [U.S. EPA Consent Decree]	
D.2.3	Nitrogen Oxide (NO _x) Emission Limitation [U.S. EPA Consent Decree]	
D.2.4	Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
	Compliance Determination Requirements [326 IAC 2-7-5(1)]	59
D.2.5	Sulfur Dioxide (SO ₂) Control [U.S. EPA Consent Decree]	
D.2.6	Nitrogen Oxide (NO _x) Control [U.S. EPA Consent Decree]	
	Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	60
D.2.7	Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [U.S. EPA Consent Decree]	
D.2.8	Visible Emissions Notations	
D.2.9	Continuous Emissions Monitoring System (CEMS) Downtime [U.S. EPA Consent Decree]	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	62
D.2.10	Record Keeping Requirements	
D.2.11	Reporting Requirements	

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS.....	64
Emission Limitations and Standards [326 IAC 2-7-5(1)]	64
D.3.1 Preventive Maintenance Plan [326 IAC 2-7-5(12)]	
Compliance Determination Requirements [326 IAC 2-7-5(1)]	64
D.3.2 Continuous Opacity Monitoring [326 IAC 3-5]	
Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	64
D.3.3 Visible Emissions Notations	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	65
D.3.4 Record Keeping Requirements	
D.3.5 Reporting Requirements	
SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS.....	66
Emission Limitations and Standards [326 IAC 2-7-5(1)]	66
D.4.1 PSD Minor Limit [326 IAC 2-2]	
D.4.2 Particulate Matter [326 IAC 6-2-4]	
D.4.3 Particulate Matter [326 IAC 6-3-2]	
D.4.4 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(12)]	
Compliance Determination Requirements [326 IAC 2-7-5(1)]	67
D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]	
Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]	67
D.4.6 Parametric Monitoring	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	68
D.4.7 Record Keeping Requirements	
SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS.....	69
Emission Limitations and Standards [326 IAC 2-7-5(1)]	69
D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]	
D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]	
Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	70
D.5.3 Record Keeping Requirements	
SECTION E.1 NESHAP - 40 CFR 61, Subpart V.....	71
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements	
[326 IAC 2-7-5(1)]	72
E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 [326 IAC 14-1] [40 CFR Part 61, Subpart A]	
E.1.2 National Emission Standard for Equipment Leaks (Fugitive Emission Sources) NESHAP [40 CFR Part 61, Subpart V] [326 IAC 14-8]	
SECTION E.2 NESHAP - 40 CFR 61, Subpart FF.....	74
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements	
[326 IAC 2-7-5(1)]	76
E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 [40 CFR Part 63, Subpart A]	
E.2.2 National Emission Standards for Benzene Waste Operations NESHAP [40 CFR Part 61, Subpart FF]	
SECTION E.3 NESHAP - 40 CFR 63, Subpart DD.....	77
National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements	
[326 IAC 2-7-5(1)]	78
E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]	

- E.3.2 National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations NESHAP [40 CFR Part 63, Subpart DD] [326 IAC 20-23]

SECTION E.4 NESHAP - 40 CFR 63, Subpart EEE 80

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)] 80**

- E.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
E.4.2 National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors NESHAP [40 CFR Part 63, Subpart EEE] [326 IAC 20-28]

SECTION E.5 NESHAP - 40 CFR 63, Subpart LLL 82

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)] 91**

- E.5.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]
E.5.2 National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry NESHAP [40 CFR Part 63, Subpart LLL] [326 IAC 20-27]

SECTION E.6 NESHAP - 40 CFR 63, Subpart ZZZZ 92

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements
[326 IAC 2-7-5(1)] 92**

- E.6.1 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

CERTIFICATION 94

EMERGENCY OCCURRENCE REPORT 95

PART 70 QUARTERLY REPORT - CKD Throughput - EU902, EU903, and EU904 97

QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT 98

Attachment A - 40 CFR 61, Subpart V - National Emission Standard for Equipment Leaks (Fugitive Emission Sources)

Attachment B - 40 CFR 61, Subpart FF - National Emission Standard for Benzene Waste Operations

Attachment C - 40 CFR 63, Subpart DD - National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations

Attachment D - 40 CFR 63, Subpart EEE - National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors

Attachment E - 40 CFR 63, Subpart LLL - National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

Attachment F - 40 CFR 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

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.4 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary portland cement manufacturing plant.

Source Address:	3084 West CR 225 South, Logansport, Indiana 46947
General Source Phone Number:	(574) 739-6132
SIC Code:	3241 (Hydraulic Cement)
County Location:	Cass County, Clinton Township
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

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

Quarry Activities

- (1) Drilling (EU101) and blasting (EU102), operations commenced in 1961, with an estimated nominal production capacity of 1,305,400 tons per year, emissions are fugitive.

Raw Material / Clinker Stockpile Operations

- (2) One (1) limestone stockpile, operations commenced in 1961, identified as EU103, with an estimated nominal throughput capacity of 1,305,400 tons per year, particulate emissions are uncontrolled.
- (3) Two (2) reclaimed clay stockpiles, operations commenced in 1961, identified as EU104 and EU105, with an estimated nominal throughput capacity of 116,600 tons per year, each, particulate emissions are uncontrolled.
- (4) Two (2) wet fly ash stockpiles, operations commenced in 1967, identified as EU106 and EU107, with an estimated nominal throughput capacity of 69,900 tons per year, each, particulate emissions are uncontrolled.
- (5) Carhoe Missouri clay unloading, operations commenced in 1962, identified as EU108, with an estimated nominal throughput capacity of 49,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (6) Clay transfer, truck to quarry stockpile, operations commenced in 1961, identified as EU109, with an estimated nominal throughput capacity of 49,500 tons per year, particulate emissions are uncontrolled.
- (7) One (1) Missouri clay stockpile, operations commenced in 1962, identified as EU110, with an estimated nominal throughput capacity of 49,500 tons per year, particulate emissions are uncontrolled.

- (8) One (1) alternate materials stockpile, operations commenced in 1967, identified as EU111, with an estimated nominal throughput capacity of 49,500 tons per year, particulate emissions are uncontrolled.
- (9) One (1) overburden clay stockpile, operations commenced in 1962, identified as EU128, with an estimated nominal throughput capacity of 191,400 tons per year, particulate emissions are uncontrolled.
- (10) One (1) iron ore stockpile, operations commenced in 1967, identified as EU301, with an estimated nominal throughput capacity of 18,900 tons per year, particulate emissions are uncontrolled.
- (11) Iron ore unloading, operations commenced in 1967, identified as EU302, with an estimated nominal throughput capacity of 18,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (12) One (1) gypsum stockpile, operations commenced in 1962, identified as EU303, with an estimated nominal throughput capacity of 54,500 tons per year, particulate emissions are uncontrolled.
- (13) Gypsum unloading, operations commenced in 1962, identified as EU304, with an estimated nominal throughput capacity of 54,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (14) One (1) coal/coke stockpile, operations commenced in 1962, identified as EU305, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled.
- (15) Coal/coke unloading, operations commenced in 1962, identified as EU306, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (16) One (1) outside coal/coke crane storage stockpile, operations commenced in 1962, identified as EU312, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled.
- (17) Coal/coke unloading, operations commenced in 1962, identified as EU313, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (18) West clinker stockpiles, operations commenced in 1962, identified as EU512, with an estimated nominal throughput capacity of 735,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (19) Special clinker stockpile, operations commenced in 1962, identified as EU513, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (20) Clinker loading, operations commenced in 1962, identified as EU514, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (21) Special clinker stockpile (crushed), operations commenced in 1962, identified as EU515, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Raw Material Sizing Operations

- (22) Raw material loading, operations commenced in 1962, identified as EU112, with an estimated nominal throughput capacity of 1,846,100 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (23) Raw material unloading, operations commenced in 1962, identified as EU114, with an estimated nominal throughput capacity of 1,660,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (24) One (1) apron feeder transfer to primary crusher, constructed in 1961, identified as EU115, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a water spray. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (25) One (1) primary crusher, constructed in 1961, identified as EU116, with an estimated nominal throughput capacity of 550 tons per hour, with particulate emissions controlled by one (1) baghouse, identified as baghouse 101 (CE101), and exhausting to one (1) stack, identified as EP101.
- (26) One (1) clean-up screw, constructed in 1961, identified as EU117, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (27) One (1) impact apron feeder, constructed in 1961, identified as EU118, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 101 (CE101), and exhausting to one (1) stack, identified as EP101. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (28) Belt 1 covered conveyor, constructed in 1962, identified as EU119, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouse 101 (CE101) and baghouse 102 (CE102) (replaced in 2008), and exhausting to two (2) stacks, identified as EP101 and EP102, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (29) Screen transfers, constructed in 1962, identified as EU120, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (30) Belt 2 covered conveyor, constructed in 1962, identified as EU121, with an estimated nominal throughput capacity of 300 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (31) One (1) secondary crusher, constructed in 1969, identified as EU122, with an estimated nominal throughput capacity of 300 tons per hour, with particulate emissions controlled by one (1) baghouse, identified as baghouse 102 (CE102) (replaced in 2008), and exhausting to one (1) stack identified as EP102.
- (32) Belt 3 covered conveyor, constructed in 1962, identified as EU201, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Recycled CKD Operations

- (33) #1 recycled dust elevator, constructed in 1965, identified as EU408, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (34) One (1) recycled dust holding tank, constructed in 1965, identified as EU409, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions vent to EU410 (feeder screw and F-K pump) and are controlled by baghouse 106 (CE402). [40 CFR 63, Subpart LLL]
- (35) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU410, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Waste CKD Operations

- (36) Five (5) enclosed discharge hopper screws, transferring kiln dust collected in Baghouse #1 (CE401), constructed in 1965, identified as EU402, each with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (37) One (1) covered 16" cross screw, constructed in 1965, identified as EU403, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are controlled with a screw cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (38) One (1) #1 waste dust elevator, constructed in 1965, identified as EU404, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (39) One (1) 9" cross screw, constructed in 1965, identified as EU405, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Recycled CKD Operations

- (40) #2 recycled dust elevator, constructed in 1965, identified as EU417, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (41) One (1) recycled dust holding tank, constructed in 1965, identified as EU418, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402.
- (42) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU419, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Waste CKD Operations

- (43) Five (5) enclosed discharge hopper screws, constructed in 1965, identified as EU414, with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (44) 16" covered cross screws, constructed in 1965, identified as EU415, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (45) #2 waste dust elevator, constructed in 1965, identified as EU416, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

Waste CKD Disposal Operations

- (46) Truck loading, operations commenced in 1962, identified as EU407, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (47) One (1) cement kiln dust pile, operations commenced in 1962, identified as EU423, with an estimated nominal throughput capacity of 183,950 tons per year, particulate emissions are uncontrolled.

Clay Processing Operations

- (48) Clay unloading to hopper, operations commenced in 1962, identified as EU123, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (49) One (1) wobbler feeder for transferring clay to the log washer system, constructed in 1962, identified as EU124, with an estimated nominal throughput capacity of 30 tons per hour, emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (50) One (1) log washer system, constructed in 1962, identified as EU125, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (51) One (1) waste gravel pile, operations commenced in 1962, identified as EU126, with an estimated nominal throughput capacity of 8,000 tons per year, particulate emissions are uncontrolled.
- (52) Loading waste gravel into trucks, operations commenced in 1962, identified as EU127, with an estimated nominal throughput capacity of 8,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Crane Storage Facilities

- (53) Three (3) limestone storage bins, constructed in 1962, identified as EU202, with an estimated combined nominal throughput capacity of 1,587,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (54) One (1) Missouri clay storage bin, constructed in 1962, identified as EU203, with an estimated nominal throughput capacity of 8,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (55) One (1) iron ore storage bin, constructed in 1962, identified as EU204, with an estimated nominal throughput capacity of 18,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (56) West fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU210, including tank 9, with a nominal storage capacity of 100 tons, tank 10 with a nominal storage capacity of 100 tons, tank 11 with a nominal storage capacity of 125 tons, and tank 12 with a nominal storage capacity of 125 tons, with an estimated throughput of 15 tons per hour for each tank, with emissions controlled by one (1) baghouse, identified as baghouse 138 (CE202) (replaced in 2008), and exhausting to one (1) stack, identified as EP202. [40 CFR 63, Subpart LLL]
- (57) One (1) inside west fly ash holding tank, constructed in 1962, identified as EU211, with a nominal storage capacity of 130 tons, with emissions controlled by one (1) baghouse, identified as baghouse 104 (CE203), and exhausting to one (1) stack, identified as EP203. [40 CFR 63, Subpart LLL]
- (58) East fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU213, with an estimated nominal throughput capacity of 21,900 tons per year,

with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]

- (59) One (1) east fly ash storage bin, constructed in 1962, identified as EU214, with an estimated nominal throughput capacity of 21,900 tons per year, with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]
- (60) One (1) spare coal/coke storage bin, constructed in 1962, identified as EU314, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled.
- (61) One (1) coal/coke storage bin, constructed in 1962, identified as EU315, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled.
- (62) Two (2) gypsum storage bins, constructed in 1962, identified as EU316, with an estimated combined nominal throughput capacity of 54,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (63) Clinker bin 1 finish mill #1, constructed in 1962, identified as EU505, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (64) Stone/clinker bin 2 finish mill #1, constructed in 1962, identified as EU506, with an estimated nominal throughput capacity of 390,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (65) Clinker bin 3 finish mill #1, constructed in 1962, identified as EU507, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (66) Crane unloading, operations commenced in 1962, identified as EU510, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (67) Clinker bin 1 #2 finish mill, constructed in 1962, identified as EU520, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (68) Clinker bin 2 #2 finish mill, constructed in 1962, identified as EU521, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (69) Bin 1 clinker spill pile, constructed in 1962, identified as EU522, with an estimated nominal throughput capacity of 367,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Raw Mill Facilities

- (70) Three (3) belt feeders, constructed in 1962, identified as EU205, with an estimated nominal throughput capacity of 45 tons per hour, combined, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (71) One (1) Missouri clay belt feeder, constructed in 1962, identified as EU206, with a nominal capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (72) One (1) iron ore feeder, constructed in 1962, identified as EU207, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (73) One (1) covered cross belt, constructed in 1962, identified as EU208, with a nominal capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (74) One (1) covered raw mill feed belt, constructed in 1962, identified as EU209, with a nominal capacity of 175 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (75) Transfer screw to raw mill, constructed in 1962, identified as EU212, with a nominal capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (76) One (1) east short covered screw, constructed in 1962, identified as EU215, with a nominal capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (77) One (1) E-W long covered screw, constructed in 1962, identified as EU216, with a nominal capacity of 15 tons per hour, with particulate matter emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Unloading Station Facilities

- (78) Railroad unloading, operations commenced in 1962, identified as EU307, with an estimated nominal throughput of 212,800 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]
- (79) Two (2) unloading station hoppers, constructed in 1962, identified as EU308a and EU308b, each with an estimated nominal throughput of 50 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (80) One (1) belt feeder, constructed in 1962, identified as EU309, with an estimated nominal throughput capacity of 50 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (81) Belt 7 covered conveyor, constructed in 1962, identified as EU310, with an estimated nominal throughput capacity of 200 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (82) Conveyor transfer to outside storage, constructed in 1962, identified as EU311, with an estimated nominal throughput capacity of 200 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (83) Crane unloading of coal/coke from the spare storage bin (EU314) to the coal/coke storage bin (EU315), constructed in 1962, identified as EU325, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled.

Fossil Fuel Facilities

- (84) One (1) coal/coke spare belt feeder to belt 8, constructed in 1962, identified as EU317, with an estimated nominal throughput of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (85) One (1) coal/coke belt feeder to belt 8, constructed in 1962, identified as EU318, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (86) Belt 8 to coal/coke tanks, constructed in 1962, identified as EU319, with an estimated nominal throughput capacity of 200 tons per hour, particulate emissions are uncontrolled.
- (87) One (1) coal/coke tank #1, constructed in 1962, identified as EU320, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
- (88) Belt feed to coal mill #1, constructed in 1962, identified as EU321, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (89) Coal/Coke cross belt, constructed in 1962, identified as EU322, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (90) One (1) coal/coke tank #2, constructed in 1962, identified as EU323, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
- (91) Belt feed to coal mill #2, constructed in 1962, identified as EU324, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.

Kiln #1 Clinker Handling Facilities

- (92) One (1) #1 clinker drag conveyor, constructed in 1962, identified as EU501, with an estimated nominal throughput capacity of 42 tons of clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (93) Two (2) #1 CCDC screw conveyors, constructed in 1962, identified as EU502, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE 404), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (94) #1 clinker elevator, constructed in 1962, identified as EU503, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (95) Clinker conveyor transfer system, constructed in 1962 and modified in 1975, identified as EU504, with an estimated throughput of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 110 (CE502) and 140 (CE804), and exhausting to two (2) stacks, identified as EP502 and EP804, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Clinker Handling Facilities

- (96) #2 clinker drag conveyor, constructed in 1964, identified as EU516, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouse 112 (CE503) and baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (97) Two (2) #2 CCDC screw conveyors, constructed in 1964, identified as EU517, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP407. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (98) #2 clinker elevator, constructed in 1964, identified as EU518, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouse 112 (CE503) and as baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (99) Clinker conveyor transfer system circuit, constructed in 1964, identified as EU519, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 113 (CE504) and 141 (CE805), and exhausting to two (2) stacks, identified as EP504 and EP805, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #1 Facilities

- (100) Clinker bin #1 feeder, constructed in 1962, identified as EU508, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (101) Stone/clinker bin 2 feeder, constructed in 1962, identified as EU509, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (102) One (1) gypsum feed belt, constructed in 1962, identified as EU511, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (103) One (1) finish mill #1 feed belt, constructed in 1962, identified as EU601, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (104) One (1) finish mill #1 circuit, constructed in 1962, identified as EU602, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 116 (CE602), and exhausting to one (1) stack, identified as EP602. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (105) One (1) separator, cooler #1 and transfer, constructed in 1962, identified as EU603, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 115 (CE603), and exhausting to one (1) stack, identified as EP603. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #2 Facilities

- (106) Clinker bin 1 feeder, constructed in 1964, identified as EU523, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117a (CE604a), and exhausting to one (1) stack, identified as EP604a.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (107) Clinker bin 2 feeder, constructed in 1964, identified as EU524, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117b (CE604b), and exhausting to one (1) stack, identified as EP604b.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (108) FM #2 gypsum feeder, constructed in 1964, identified as EU525, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (109) One (1) finish mill #2 feed belt, constructed in 1964, identified as EU604, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by two (2)

baghouses, identified as baghouses 117a (CE604a) and 117b (CE604b), respectively, and exhausting to two (2) stacks, identified as EP604a and EP604b, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (110) One (1) finish mill #2 circuit, constructed in 1964, identified as EU605, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 119 (CE605), and exhausting to one (1) stack, identified as EP605. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (111) One (1) separator, cooler #2 and transfer, constructed in 1964, identified as EU606, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 118 (CE606), and exhausting to one (1) stack, identified as EP606. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Product Silo Storage Facilities

- (112) Silos 1/2/3/4/5/6/7, constructed in 1961, identified as EU709, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 122 (CE709), each exhausting to stack EP709, with following storage capacities:
 - (a) Silo 1 and Silo 3, each with 5,806 tons of storage, and an estimated annual throughput of 84,100 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (b) Silo 2 and Silo 4, each with 6,686 tons of storage, and an estimated annual throughput of 86,500 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (c) Silo 5 and Silo 7, each with 6,577 tons of storage, and an estimated annual throughput of 81,300 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (d) Silo 6, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
- (113) Silos 8/9/10, constructed in 1961, identified as EU711, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 124 (CE711), each exhausting to stack EP711, with the following storage capacities:
 - (a) Silo 8, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
 - (b) Silo 9 and Silo 10, each with 5,930 tons of storage, and an estimated annual throughput of 78,700 tons of cement per year, each. [40 CFR 63, Subpart LLL]
- (114) Silos 11/12/13/14/15/16/17/18, identified as EU704, constructed in 1965 and approved in 2012 to be operated two ways. First scenario, silos 11/12/13/14/15/16/17/18 emissions will be controlled by both baghouses, identified as baghouse 126 (CE704), and exhausting to one (1) stack, identified as EP704 and baghouse, identified as baghouse 144 (CE905), and exhausting to one (1) stack, identified as EP905. Second operating scenario, is to isolate the connecting vent for silos 15/18 from the remaining silos, 11/12/13/14/16/17. Silos 15/18 emissions will be controlled by baghouse, identified as baghouse 144 (CE905) and silos 11/12/13/14/16/17 will be controlled by baghouse 126 (CE704). [40 CFR 63, Subpart LLL]

Finish Product Silo Transfer Operations

- (115) Truck/Railroad car unloading and internal transfers to silos, operations commenced in 1962, identified as EU701 and EU702, with an estimated nominal throughput capacity of each unit of 8,000 tons per year, and 100 tons per hour, with emissions from EU701 controlled by one (1) baghouse, identified as baghouse 132 (CE701), and emissions from EU702 controlled by one (1) baghouse, identified as baghouse 133 (CE702), and exhausting to two (2) stacks, identified as EP701 and EP702, respectively. [40 CFR 63, Subpart LLL]

Finish Product Loadout Old Silos (West) Operation

- (116) West bulk truck loadout, constructed in 1962, identified as EU712, with an estimated nominal throughput of 335,300 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 129 (CE712), and exhausting to one (1) stack, identified as EP712. [40 CFR 63, Subpart LLL]
- (117) Bulk railroad loadout, constructed in 1962, identified as EU713, with an estimated nominal throughput of 335,300 tons per year, and 100 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 130 (CE713), and exhausting to one (1) stack, identified as EP713. [40 CFR 63, Subpart LLL]

Finish Product Loadout New Silos (East) Operation

- (118) East bulk truck loadout, constructed in 1965, identified as EU706, with an estimated nominal throughput capacity of 390,200 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 131 (CE706), and exhausting to one (1) stack, identified as EP706. [40 CFR 63, Subpart LLL]

Finish Product Masonry Packing

- (119) Transfer to masonry packer, constructed in 1965, identified as EU801, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 128 (CE801) and 139 (CE802), and exhausting to two (2) stacks, identified as EP801 and EP802, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (120) One (1) masonry packer, constructed in 1965, identified as EU802, with an estimated nominal throughput capacity of 118, 300 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 128 (CE801), and exhausting to one (1) stack, identified as EP801. [40 CFR 63, Subpart LLL]
- (121) Transfer to pallets/storage (masonry), constructed in 1965, identified as EU803, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, particulate emissions are uncontrolled.

Finish Product Portland Packing

- (122) Transfer to portland packer, constructed in 1962, identified as EU804, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (123) One (1) portland packer, constructed in 1962, identified as EU805, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL]
- (124) Transfer to pallets/storage (portland), constructed in 1962, identified as EU806, with an estimated nominal throughput of 78,800 tons per year, and 44 tons per hour, particulate emissions are uncontrolled.

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NO_x emissions controlled with a selective non-catalytic reduction (SNCR) system and water injection system, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing

system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a water injection system for NOx emissions control, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

Clinker Cooler #1 Facilities

- (127) One (1) clinker cooler #1, identified as EU412, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE404), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL]

Clinker Cooler #2 Facilities

- (128) One (1) clinker cooler #2, identified as EU421, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL]

CKD –To-Finish Mill (CKD2FM) Recycling Operations

- (129) One (1) waste dust tank, constructed in 1962, modified in 2006 with the addition of one (1) CKD2FM surge system consisting of a screw conveyor, surge bin, piping and connectors and a double tipping valve, collectively identified as EU406, with emissions controlled by baghouse 142 (CE901), and exhausting to stack EP901.
- (130) One (1) CKD2FM recycling storage tank system, approved for construction in 2006, identified as EU902, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a storage tank, rotary airlock feeder, an air blower, and ancillary piping and connectors, emissions are controlled by baghouse 143 (CE 902), exhausting to stack EP902. [40 CFR 63, Subpart LLL]
- (131) One (1) CKD2FM #1 FM recycling system, approved in 2006 for construction, identified as EU903, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a sealed system with a weigh bin, a rotary airlock feeder, ancillary piping and connector, and a screw conveyor, emissions vent to EU602 (Finish Mill #1 Circuit).
- (132) One (1) CKD2FM #2 FM recycling system, approved in 2006 for construction, identified as EU904, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a sealed system with a weigh bin, a rotary airlock feeder, ancillary piping and connector, and a screw conveyor, emissions vent to EU605 (Finish Mill #2 Circuit).

Hazardous Waste Derived Fuel System Operations

- (133) Four (4) liquid hazardous waste-derived fuel storage tanks, approved for construction in 2010, identified collectively as EU906, with maximum capacities of 39,800 gallons each, vented to one (1) activated carbon canister system or a kiln/cooler for VOC control. [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (134) One (1) bulk solids management system, approved for construction in 2010, producing 58,400,000 gallons of blended fuel per year, consisting of: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]

- (i) One (1) feed hopper and two (2) augers contained inside the solids management building and two (2) screw conveyors, collectively identified as EU908, and all associated equipment with HAP and VOC emissions routed to a kiln/cooler for control; and
- (ii) One (1) hydropulper tank with a maximum capacity of 3,750 gallons and one (1) level control tank with a maximum capacity of 3,500 gallons, collectively identified as EU907 with all associated equipment, vented to one (1) activated carbon canister system or a kiln/cooler for HAP and VOC control.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

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

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one parts washer constructed in 1991. [326 IAC 8-3-2] [326 IAC 8-3-8]
- (b) Hazardous Waste Fuel Facility: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
 - (1) Waste Management Units
 - (i) Ten (10) hazardous waste-derived fuel storage tanks, installed in 1987 and 1994, with capacities ranging from 22,000-39,000 gallons. All tanks are connected to an integrated emission control system.
 - (ii) Carbon Steel Piping System
 - (iii) Tank Rail Cars and Trucks
 - (2) Equipment components
 - (i) Valves
 - (ii) Pumps
 - (iii) AWFCO Valves
 - (3) Caps (hose end covers)
 - (4) Flanges
 - (5) Manways
 - (6) Flame Arrestors
 - (7) Filter Pots
 - (8) Micro-motion Flow Meters
 - (9) Level Transmitters
 - (10) Pressure Indicators
 - (11) Pressure Transmitters

- (12) Emergency Conservation Vent
- (13) Carbon Canister VOC Monitor
- (14) Tank Emergency Relief Ports
- (15) High Level Probes
- (16) Activated Carbon Canister System
- (c) Three (3) natural gas-fired boilers, collectively identified as EU909, utilizing low-NO_x burners, approved for construction in 2010, with a total maximum heat input capacity of 1.8 MMBtu/hr (0.6 MMBtu/hr, each). [326 IAC 6-2-4]
- (d) Paved and unpaved roads and parking lots with public access, constructed on and after August 7, 1977, collectively identified as EU900. [326 IAC 6-4]
- (e) Activities associated with emergencies, including the following:
 - (1) One (1) four-stroke diesel-fired emergency engine, engine manufactured on April 27, 1983, identified as Kiln #1 backup, with a rated output of 100 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]
 - (2) One (1) four-stroke diesel-fired emergency engine, engine manufactured on April 27, 1983, identified as Kiln #2 backup, with a rated output of 100 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]
 - (3) One (1) four-stroke diesel-fired emergency generator, engine manufactured prior to 2000, identified as Control Room backup, with a rated output of 587 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]

A.4 Other Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities which are not specifically regulated, as defined in 326 IAC 2-7-1(21):

- (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:
 - (1) For lead or lead compounds measured as elemental lead, the exemption level is six-tenths (0.6) ton per year or three and twenty-nine hundredths (3.29) pounds per day.
 - (2) For carbon monoxide (CO), the exemption limit is twenty-five (25) pounds per day.
 - (3) For sulfur dioxide, the exemption level is five (5) pounds per hour or twenty-five (25) pounds per day.
 - (4) For VOC, the exemption limit is three (3) pounds per hour or fifteen (15) pounds per day.
 - (5) For nitrogen oxides (NO_x), the exemption limit is five (5) pounds per hour or twenty-five (25) pounds per day.
 - (6) For PM₁₀ or direct PM_{2.5}, the exemption level is either five (5) pounds per hour or twenty-five (25) pounds per day.

Including the following emission units or activities:

- (1) One (1) 15,600 gallon diesel fuel storage tank;
- (2) Five (5) grinding aid storage tanks
- (3) Baghouse 134 Mill Building
- (5) Clay Screening Station
- (6) Doorclone Separator
- (7) DSM Classifier
- (8) Eight (8) Slurry Tanks
- (9) Two (2) coal mills, identified as Coal Mill #1 and Coal Mill #2, constructed prior to October 27, 1974.
- (10) Three (3) 15,600 gallon alternative fuel and oil storage tanks
- (b) A petroleum fuel other than gasoline dispensing facility, having a storage tank capacity less than or equal to ten thousand five hundred (10,500) gallons, and dispensing three thousand five hundred (3,500) gallons per day or less.
- (c) Combustion related activities including space heaters, process heaters, heat treat furnaces, or boilers using propane or liquefied petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) British thermal units per hour.
- (d) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to one thousand (1,000) gallons and annual throughputs equal to or less than twelve thousand (12,000) gallons.
 - (2) Vessels storing the following:
 - (i) Lubricating oils;
 - (ii) Hydraulic oils;
 - (iii) Machining oils; and
 - (iv) Machining fluids.
- (e) Refractory storage not requiring air pollution control equipment.
- (f) Production related activities, including the
 - (1) Application of nonvolatile materials as a temporary protective coating;
 - (2) The following equipment related to manufacturing activities not resulting in the emission of HAPs:
 - (i) Brazing;
 - (ii) Cutting torches;
 - (iii) Soldering; and

- (iv) Welding; and
- (3) Closed loop heating and cooling systems.
- (g) Water based activities, including the following:
 - (1) Water run-off ponds for petroleum coke-cutting and coke storage piles;
 - (2) Any operation using aqueous solutions containing less than or equal to one percent (1%) by weight of VOCs excluding HAPs; and
 - (3) Noncontact cooling tower systems with a forced or induced draft cooling tower systems not regulated under a NESHAP.
- (h) Repair activities, including the following:
 - (1) Replacement or repair of electrostatic precipitators, bags in baghouses, and filters in other air filtration equipment; and
 - (2) Process vessel degassing and cleaning to prepare for internal repairs.
- (i) Conveyors as follows:
 - (1) Covered conveyors for solid raw material, including the following:
 - (i) Coal or coke conveying of less than or equal to three hundred sixty (360) tons per day; and
 - (ii) Limestone conveying of less than or equal to seven thousand two hundred (7,200) tons per day for sources other than mineral processing plants constructed after August 31, 1983;
 - (2) Uncovered coal or coke conveying of less than or equal to one hundred twenty (120) tons per day; and
 - (3) Underground conveyors.
- (j) Routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process, including the following:
 - (1) Purging of gas lines; and
 - (2) Purging of vessels.
- (k) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including the following:
 - (1) Tanks; and
 - (2) Fluid handling equipment.
- (l) Blowdown for compressors.
- (m) Purge double block and bleed valves.
- (n) Filter or coalescer media changeout.

- (o) Emissions from a laboratory as defined in 326 IAC 2-7-1(21)(D).
- (p) Other emission units or activities with potential uncontrolled emissions below the insignificant threshold levels, including: Raw Mill #1 and Raw Mill #2, using a wet process to grind slurries of calcium, silica, iron or alumina containing raw materials, with no particulate matter emissions.
- (q) A gasoline fuel transfer dispensing operation handling less than or equal to one thousand three hundred (1,300) gallons per day and filling storage tanks having a capacity equal to or less than ten thousand five hundred (10,500) gallons. Such storage tanks may be in a fixed location or on mobile equipment.

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

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

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

SECTION B GENERAL CONDITIONS

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

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

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

- (a) This permit, T017-35434-00005, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

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

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

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

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

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

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

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

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

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

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

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

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:
 - (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and

- (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

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

- (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 July 1 of each year to:

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

and

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

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

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

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

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing

emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

- (b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

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

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

- (c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

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

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

defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

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

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

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

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

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

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

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

- (b) In addition to the nonapplicability determinations set forth in Section D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
 - (1) None of the storage tanks listed in Section A.3 - Specifically Regulated Insignificant Activities of this permit are subject to the NSPS 326 IAC 12, 40 CFR 60.110b (Subpart Kb) because the tanks have capacities less than 19,815 gallons, or do not contain a substance categorized as volatile organic liquid (VOL), or have capacities between 19,815 gallons and 39,900 gallons storing a liquid with a maximum true vapor pressure less than 15.0 kPa.
 - (2) The quarry activities and the raw material sizing facilities listed in Section A.2 of this permit are not subject to the requirements of the NSPS 326 IAC 12, 40 CFR 60.670 (Subpart OOO) because they were constructed prior to the applicability date of August 31, 1983.
 - (3) None of the facilities listed in Sections A.2, A.3, and A.4 of this permit are subject to the requirements of the NSPS 326 IAC 12, 40 CFR 60.670 (Subpart OOO) because this rule specifically exempts facilities that are subject to the requirements of the NSPS, 40 CFR 60.60 (Subpart F), and facilities which follow in the plant process any facility which is subject to the requirements of the NSPS, 40 CFR 60.60 (Subpart F).
 - (4) None of the facilities listed in this permit are subject to the requirements of the NSPS 326 IAC 12, 40 CFR 60.730 (Subpart UUU) because the source does not fit the definition of a mineral processing plant.
 - (5) None of the facilities listed in Section A.1, A.2, and A.3 are subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants). The truck unloading facilities (EU210 and EU213) were previously subject to the applicable requirements of 40 CFR

60, Subpart F. However, they are no longer subject since they are currently subject to the applicable requirements of 40 CFR 63, Subpart LLL (National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry).

- (6) The open/unenclosed material stockpiles listed in Section A.1, and any associated haul roads, are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry, 40 CFR 63, Subparts A and LLL.
 - (7) The kilns #1 and #2 listed in Section A.1 are not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because they were constructed prior to the applicability date of August 17, 1971.
 - (8) The clinker cooler #1 listed in Section A.1 is not subject to the requirements of the New Source Performance Standards (NSPS), 40 CFR 60, Subparts A and F (Standards of Performance for Portland Cement Plants) because it was constructed prior to the applicability date of August 17, 1971 and has not been modified since the applicability date. Clinker cooler #2, listed in Section A.1, was previously subject to the applicable requirements of 40 CFR 60, Subpart F. However, 40 CFR 60, Subpart F is no longer applicable since clinker cooler #2 is currently subject to the applicable requirements of 40 CFR 63, Subpart LLL (National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry).
 - (9) None of the parts washers specifically listed in Section A.2 are subject to the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) 326 IAC 20-1, 40 CFR 63.460 (Subpart T) because they do not utilize a solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these halogens, in a total concentration greater than five percent by weight.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T017-35434-00005 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

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

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

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

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

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

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(42). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

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

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

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

- (a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

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

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (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 preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(37)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

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

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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

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

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

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

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

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

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

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

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

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

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

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

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]
Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any manufacturing process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
- C.2 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 forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator 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). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

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

- C.8 Performance Testing [326 IAC 3-6]
(a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

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

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)] [40 CFR 64] [326 IAC 3-8]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) For monitoring required by CAM, at all times, the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring

equipment.

- (d) For monitoring required by CAM, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

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

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

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

C.13 Risk Management Plan [326 IAC 2-7-5(11)] [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 [40 CFR 64] [326 IAC 3-8] [326 IAC 2-7-5] [326 IAC 2-7-6]

- (l) Upon detecting an excursion where a response step is required by the D Section, or an exceedance of a limitation, not subject to CAM, 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.

(II)

- (a) CAM Response to excursions or exceedances.

- (1) Upon detecting an excursion or exceedance, subject to CAM, the Permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (2) 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, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

- (b) If the Permittee identifies a failure to achieve compliance with an emission limitation, subject to CAM, or standard, subject to CAM, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the IDEM, OAQ and, if necessary, submit a proposed significant permit modification to this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

- (c) Based on the results of a determination made under paragraph (II)(a)(2) of this condition, the EPA or IDEM, OAQ may require the Permittee to develop and implement a Quality Improvement Plan (QIP). The Permittee shall develop and implement a QIP if notified to in writing by the EPA or IDEM, OAQ.

- (d) Elements of a QIP:
The Permittee shall maintain a written QIP, if required, and have it available for inspection. The plan shall conform to 40 CFR 64.8 b (2).
- (e) If a QIP is required, the Permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the IDEM, OAQ if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
- (f) Following implementation of a QIP, upon any subsequent determination pursuant to paragraph (II)(c) of this condition the EPA or the IDEM, OAQ may require that the Permittee make reasonable changes to the QIP if the QIP is found to have:
 - (1) Failed to address the cause of the control device performance problems; or
 - (2) Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (g) Implementation of a QIP shall not excuse the Permittee from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.
- (h) CAM recordkeeping requirements.
 - (1) The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to paragraph (II)(c) of this condition and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this condition (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.
 - (2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

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

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

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

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(33) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

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

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2] [326 IAC 2-3]

- (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 Part 70 permit.

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) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A), 326 IAC 2-2-8 (b)(6)(B), 326 IAC 2-3-2 (l)(6)(A), and/or 326 IAC 2-3-2 (l)(6)(B)) that a "project" (as defined in 326 IAC 2-2-1(o) and/or 326 IAC 2-3-1(j)) at an existing emissions unit, other than projects

at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:

- (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(pp)(2)(A)(iii) and/or 326 IAC 2-3-1 (kk)(2)(A)(iii); and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (d) If there is a reasonable possibility (as defined in 326 IAC 2-2-8 (b)(6)(A) and/or 326 IAC 2-3-2 (l)(6)(A)) that a “project” (as defined in 326 IAC 2-2-1(oo) and/or 326 IAC 2-3-1(jj)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a “major modification” (as defined in 326 IAC 2-2-1(dd) and/or 326 IAC 2-3-1(y)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-2-1(pp) and/or 326 IAC 2-3-1(kk)), the Permittee shall comply with following:
 - (1) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
 - (2) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3] [40 CFR 64] [326 IAC 3-8]

- (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 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit. On and after the date by which the Permittee must use monitoring that meets the requirements of 40 CFR Part 64 and 326 IAC 3-8, the Permittee shall submit CAM reports to the IDEM, OAQ.

A report for monitoring under 40 CFR Part 64 and 326 IAC 3-8 shall include, at a minimum, the information required under paragraph (a) of this condition and the following information, as applicable:

- (1) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (2) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (3) A description of the actions taken to implement a QIP during the reporting period as specified in Section C-Response to Excursions or Exceedances. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

The Permittee may combine the Quarterly Deviation and Compliance Monitoring Report and a report pursuant to 40 CFR 64 and 326 IAC 3-8.

- (b) The address for report submittal is:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit, "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (d) in Section C - General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (oo) and/or 326 IAC 2-3-1 (jj)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (ww) and/or 326 IAC 2-3-1 (pp), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(ii).

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

Reports required in this part shall be submitted to:

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

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

Stratospheric Ozone Protection

C.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:

Raw Material / Clinker Stockpile Operations

- (2) One (1) limestone stockpile, operations commenced in 1961, identified as EU103, with an estimated nominal throughput capacity of 1,305,400 tons per year, particulate emissions are uncontrolled.
- (4) Two (2) wet fly ash stockpiles, operations commenced in 1967, identified as EU106 and EU107, with an estimated nominal throughput capacity of 69,900 tons per year, each, particulate emissions are uncontrolled.

Raw Material Sizing Operations

- (22) Raw material loading, operations commenced in 1962, identified as EU112, with an estimated nominal throughput capacity of 1,846,100 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (23) Raw material unloading, operations commenced in 1962, identified as EU114, with an estimated nominal throughput capacity of 1,660,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (24) One (1) apron feeder transfer to primary crusher, constructed in 1961, identified as EU115, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a water spray. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (25) One (1) primary crusher, constructed in 1961, identified as EU116, with an estimated nominal throughput capacity of 550 tons per hour, with particulate emissions controlled by one (1) baghouse, identified as baghouse 101 (CE101), and exhausting to one (1) stack, identified as EP101.
- (27) One (1) impact apron feeder, constructed in 1961, identified as EU118, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 101 (CE101), and exhausting to one (1) stack, identified as EP101. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (28) Belt 1 covered conveyor, constructed in 1962, identified as EU119, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouse 101 (CE101) and baghouse 102 (CE102) (replaced in 2008), and exhausting to two (2) stacks, identified as EP101 and EP102, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (29) Screen transfers, constructed in 1962, identified as EU120, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (30) Belt 2 covered conveyor, constructed in 1962, identified as EU121, with an estimated nominal throughput capacity of 300 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (31) One (1) secondary crusher, constructed in 1969, identified as EU122, with an estimated nominal throughput capacity of 300 tons per hour, with particulate emissions controlled by one (1) baghouse, identified as baghouse 102 (CE102) (replaced in 2008), and exhausting to one (1) stack identified as EP102.

- (32) Belt 3 covered conveyor, constructed in 1962, identified as EU201, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Recycled CKD Operations

- (33) #1 recycled dust elevator, constructed in 1965, identified as EU408, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (34) One (1) recycled dust holding tank, constructed in 1965, identified as EU409, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions vent to EU410 (feeder screw and F-K pump) and are controlled by baghouse 106 (CE402). [40 CFR 63, Subpart LLL]
- (35) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU410, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Waste CKD Operations

- (36) Five (5) enclosed discharge hopper screws, transferring kiln dust collected in Baghouse #1 (CE401), constructed in 1965, identified as EU402, each with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (37) One (1) covered 16" cross screw, constructed in 1965, identified as EU403, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are controlled with a screw cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (38) One (1) #1 waste dust elevator, constructed in 1965, identified as EU404, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (39) One (1) 9" cross screw, constructed in 1965, identified as EU405, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Recycled CKD Operations

- (40) #2 recycled dust elevator, constructed in 1965, identified as EU417, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (41) One (1) recycled dust holding tank, constructed in 1965, identified as EU418, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402.
- (42) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU419, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Waste CKD Operations

- (43) Five (5) enclosed discharge hopper screws, constructed in 1965, identified as EU414, with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

(44) 16" covered cross screws, constructed in 1965, identified as EU415, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

(45) #2 waste dust elevator, constructed in 1965, identified as EU416, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Waste CKD Disposal Operations

(46) Truck loading, operations commenced in 1962, identified as EU407, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

(47) One (1) cement kiln dust pile, operations commenced in 1962, identified as EU423, with an estimated nominal throughput capacity of 183,950 tons per year, particulate emissions are uncontrolled.

Crane Storage Facilities

(53) Three (3) limestone storage bins, constructed in 1962, identified as EU202, with an estimated combined nominal throughput capacity of 1,587,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

(56) West fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU210, including tank 9, with a nominal storage capacity of 100 tons, tank 10 with a nominal storage capacity of 100 tons, tank 11 with a nominal storage capacity of 125 tons, and tank 12 with a nominal storage capacity of 125 tons, with an estimated throughput of 15 tons per hour for each tank, with emissions controlled by one (1) baghouse, identified as baghouse 138 (CE202) (replaced in 2008), and exhausting to one (1) stack, identified as EP202. [40 CFR 63, Subpart LLL]

(57) One (1) inside west fly ash holding tank, constructed in 1962, identified as EU211, with a nominal storage capacity of 130 tons, with emissions controlled by one (1) baghouse, identified as baghouse 104 (CE203), and exhausting to one (1) stack, identified as EP203.
[40 CFR 63, Subpart LLL]

(58) East fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU213, with an estimated nominal throughput capacity of 21,900 tons per year, with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]

(59) One (1) east fly ash storage bin, constructed in 1962, identified as EU214, with an estimated nominal throughput capacity of 21,900 tons per year, with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]

(63) Clinker bin 1 finish mill #1, constructed in 1962, identified as EU505, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

(64) Stone/clinker bin 2 finish mill #1, constructed in 1962, identified as EU506, with an estimated nominal throughput capacity of 390,029 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

(65) Clinker bin 3 finish mill #1, constructed in 1962, identified as EU507, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

- (66) Crane unloading, operations commenced in 1962, identified as EU510, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (67) Clinker bin 1 #2 finish mill, constructed in 1962, identified as EU520, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (68) Clinker bin 2 #2 finish mill, constructed in 1962, identified as EU521, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Raw Mill Facilities

- (70) Three (3) belt feeders, constructed in 1962, identified as EU205, with an estimated nominal throughput capacity of 45 tons per hour, combined, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (72) One (1) iron ore feeder, constructed in 1962, identified as EU207, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (74) One (1) covered raw mill feed belt, constructed in 1962, identified as EU209, with a nominal capacity of 175 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (77) One (1) E-W long covered screw, constructed in 1962, identified as EU216, with a nominal capacity of 15 tons per hour, with particulate matter emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Clinker Handling Facilities

- (92) One (1) #1 clinker drag conveyor, constructed in 1962, identified as EU501, with an estimated nominal throughput capacity of 42 tons of clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (93) Two (2) #1 CCDC screw conveyors, constructed in 1962, identified as EU502, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE 404), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (94) #1 clinker elevator, constructed in 1962, identified as EU503, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (95) Clinker conveyor transfer system, constructed in 1962 and modified in 1975, identified as EU504, with an estimated throughput of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 110 (CE502) and 140 (CE804), and exhausting to two (2) stacks, identified as EP502 and EP804, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Clinker Handling Facilities

- (96) #2 clinker drag conveyor, constructed in 1964, identified as EU516, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses,

identified as baghouse 112 (CE503) and baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (97) Two (2) #2 CCDC screw conveyors, constructed in 1964, identified as EU517, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP407. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (98) #2 clinker elevator, constructed in 1964, identified as EU518, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouse 112 (CE503) and as baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (99) Clinker conveyor transfer system circuit, constructed in 1964, identified as EU519, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 113 (CE504) and 141 (CE805), and exhausting to two (2) stacks, identified as EP504 and EP805, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #1 Facilities

- (100) Clinker bin #1 feeder, constructed in 1962, identified as EU508, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (101) Stone/clinker bin 2 feeder, constructed in 1962, identified as EU509, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (103) One (1) finish mill #1 feed belt, constructed in 1962, identified as EU601, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (104) One (1) finish mill #1 circuit, constructed in 1962, identified as EU602, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 116 (CE602), and exhausting to one (1) stack, identified as EP602.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (105) One (1) separator, cooler #1 and transfer, constructed in 1962, identified as EU603, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 115 (CE603), and exhausting to one (1) stack, identified as EP603. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #2 Facilities

- (106) Clinker bin 1 feeder, constructed in 1964, identified as EU523, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117a (CE604a), and exhausting to one (1) stack, identified as EP604a.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (107) Clinker bin 2 feeder, constructed in 1964, identified as EU524, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117b (CE604b), and exhausting to one (1) stack, identified as EP604b.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (109) One (1) finish mill #2 feed belt, constructed in 1964, identified as EU604, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 117a (CE604a) and 117b (CE604b), respectively, and exhausting to two (2) stacks, identified as EP604a and EP604b, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (110) One (1) finish mill #2 circuit, constructed in 1964, identified as EU605, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 119 (CE605), and exhausting to one (1) stack, identified as EP605. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (111) One (1) separator, cooler #2 and transfer, constructed in 1964, identified as EU606, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 118 (CE606), and exhausting to one (1) stack, identified as EP606. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Product Silo Storage Facilities

- (112) Silos 1/2/3/4/5/6/7, constructed in 1961, identified as EU709, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 122 (CE709), each exhausting to stack EP709, with following storage capacities:
- (a) Silo 1 and Silo 3, each with 5,806 tons of storage, and an estimated annual throughput of 84,100 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (b) Silo 2 and Silo 4, each with 6,686 tons of storage, and an estimated annual throughput of 86,500 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (c) Silo 5 and Silo 7, each with 6,577 tons of storage, and an estimated annual throughput of 81,300 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (d) Silo 6, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
- (113) Silos 8/9/10, constructed in 1961, identified as EU711, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 124 (CE711), each exhausting to stack EP711, with the following storage capacities:
- (a) Silo 8, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
 - (b) Silo 9 and Silo 10, each with 5,930 tons of storage, and an estimated annual throughput of 78,700 tons of cement per year, each. [40 CFR 63, Subpart LLL]
- (114) Silos 11/12/13/14/15/16/17/18, identified as EU704, constructed in 1965 and approved in 2012 to be operated two ways. First scenario, silos 11/12/13/14/15/16/17/18 emissions will be controlled by both baghouses, identified as baghouse 126 (CE704), and exhausting to one (1) stack, identified as EP704 and baghouse, identified as baghouse 144 (CE905), and exhausting to one (1) stack, identified as EP905. Second operating scenario, is to isolate the connecting vent for silos 15/18 from the remaining silos, 11/12/13/14/16/17. Silos 15/18 emissions will be controlled by baghouse, identified as baghouse 144 (CE905) and silos 11/12/13/14/16/17 will be controlled by baghouse 126 (CE704). [40 CFR 63, Subpart LLL]

Finish Product Silo Transfer Operations

- (115) Truck/Railroad car unloading and internal transfers to silos, operations commenced in 1962, identified as EU701 and EU702, with an estimated nominal throughput capacity of each unit of 8,000 tons per year, and 100 tons per hour, with emissions from EU701 controlled by one (1) baghouse, identified as baghouse 132 (CE701), and emissions from EU702 controlled by one (1)

baghouse, identified as baghouse 133 (CE702), and exhausting to two (2) stacks, identified as EP701 and EP702, respectively. [40 CFR 63, Subpart LLL]

Finish Product Loadout Old Silos (West) Operation

- (116) West bulk truck loadout, constructed in 1962, identified as EU712, with an estimated nominal throughput of 335,300 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 129 (CE712), and exhausting to one (1) stack, identified as EP712. [40 CFR 63, Subpart LLL]
- (117) Bulk railroad loadout, constructed in 1962, identified as EU713, with an estimated nominal throughput of 335,300 tons per year, and 100 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 130 (CE713), and exhausting to one (1) stack, identified as EP713. [40 CFR 63, Subpart LLL]

Finish Product Loadout New Silos (East) Operation

- (118) East bulk truck loadout, constructed in 1965, identified as EU706, with an estimated nominal throughput capacity of 390,200 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 131 (CE706), and exhausting to one (1) stack, identified as EP706. [40 CFR 63, Subpart LLL]

Finish Product Masonry Packing

- (119) Transfer to masonry packer, constructed in 1965, identified as EU801, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 128 (CE801) and 139 (CE802), and exhausting to two (2) stacks, identified as EP801 and EP802, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (120) One (1) masonry packer, constructed in 1965, identified as EU802, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 128 (CE801), and exhausting to one (1) stack, identified as EP801. [40 CFR 63, Subpart LLL]
- (121) Transfer to pallets/storage (masonry), constructed in 1965, identified as EU803, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, particulate emissions are uncontrolled.

Finish Product Portland Packing

- (122) Transfer to portland packer, constructed in 1962, identified as EU804, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (123) One (1) portland packer, constructed in 1962, identified as EU805, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL]
- (124) Transfer to pallets/storage (portland), constructed in 1962, identified as EU806, with an estimated nominal throughput of 78,800 tons per year, and 44 tons per hour, particulate emissions are uncontrolled.

CKD –To-Finish Mill (CKD2FM) Recycling Operations

- (129) One (1) waste dust tank, constructed in 1962, modified in 2006 with the addition of one (1) CKD2FM surge system consisting of a screw conveyor, surge bin, piping and connectors and a double tipping valve, collectively identified as EU406, with emissions controlled by baghouse 142 (CE901), and exhausting to stack EP901.

- (130) One (1) CKD2FM recycling storage tank system, approved for construction in 2006, identified as EU902, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a storage tank, rotary airlock feeder, an air blower, and ancillary piping and connectors, emissions are controlled by baghouse 143 (CE 902), exhausting to stack EP902.
[40 CFR 63, Subpart LLL]
- (131) One (1) CKD2FM #1 FM recycling system, approved in 2006 for construction, identified as EU903, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a sealed system with a weigh bin, a rotary airlock feeder, ancillary piping and connector, and a screw conveyor, emissions vent to EU602 (Finish Mill #1 Circuit).
- (132) One (1) CKD2FM #2 FM recycling system, approved in 2006 for construction, identified as EU904, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a sealed system with a weigh bin, a rotary airlock feeder, ancillary piping and connector, and a screw conveyor, emissions vent to EU605 (Finish Mill #2 Circuit).

(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 2-7-5(1)]

D.1.1 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), particulate emissions from the following operations shall each not exceed the pound per hour limit listed in the table below when operating at the listed process weight rate in the table below:

Emission Unit	Unit ID	Throughput (ton/hr)	Method	PM Limit (lb/hr)	Control Unit ID
Primary Crusher	EU116	550	B	70.10	BH101
Impact Apron Feeder	EU118	550	B	70.10	BH101
Belt 1 Covered Conveyor	EU119	550	B	70.10	BH101/102
Secondary Crusher	EU122	300	B	63.00	BH102
Pneumatic Fly Ash Unloading	EU213	15	A	25.163	BH103
East Fly Ash Storage Bin	EU214				
Inside Wet Fly Ash Tank	EU211	15	A	25.16	BH104
Covered Raw Mill Feed Belt	EU209	15	A	25.16	BH105
E-W Long Covered Screw	EU216	15	A	25.16	BH105
#1 Recycled Dust Elevator	EU408	15	A	25.16	BH106
Recycled Dust Holding Tank	EU409				
Feeder Screw and F-K Pump	EU410	15	A	25.16	BH106
#2 Recycled Dust Elevator	EU417	15	A	25.16	BH106
Recycled Dust Holding Tank	EU418				
Feeder Screw and F-K Pump	EU419	15	A	25.16	BH106
#1 CCDC Screw Conveyors (1)	EU502	15	A	25.16	BH109
#1 CCDC Screw Conveyors (2)	EU502	15	A	25.16	BH109
#1 Clinker Drag Conveyor	EU501	42	B	42.97	BH109
#1 Clinker Elevator	EU503	42	B	42.97	BH109
Clinker Conveyor Transfer	EU504	42	B	42.97	BH110/140
#2 CCDC Screw Conveyors (1)	EU517	15	A	25.16	BH112/113
#2 CCDC Screw Conveyors (2)	EU517	15	A	25.16	BH112/113

Emission Unit	Unit ID	Throughput (ton/hr)	Method	PM Limit (lb/hr)	Control Unit ID
#2 Clinker Drag Conveyor	EU516	42	B	42.97	BH112/113
#2 Clinker Elevator	EU518	42	B	42.97	BH112/113
Clinker Conveyor Transfer	EU519	42	B	42.97	BH113/141
Stone/Clinker Bin 2 Feeder	EU509	45	B	43.60	BH114
Finish Mill #1 Feed Belt	EU601	45	B	43.60	BH114
Separator, Cooler #1, and Transfer	EU603	45	B	43.60	BH115
Finish Mill #1 Circuit	EU602	45	B	43.60	BH116
Clinker Bin 1 Feeder	EU523	45	B	43.60	BH117a
Finish Mill #2 Feed Belt	EU604	45	B	43.60	BH117a/b
Clinker Bin 2 Feeder	EU524	45	B	43.60	BH117b
Separator, Cooler #2, and Transfer	EU606	45	B	43.60	BH118
Finish Mill #2 Circuit	EU605	45	B	43.60	BH119
Storage Silos	EU709	420	B	66.89	BH122
Storage Silos	EU711	420	B	66.89	BH124
Transfer to Portland Packer	EU804	44	B	43.40	BH127
Portland Packer	EU805	44	B	43.40	BH127
Transfer to Masonry Packer	EU801	44	B	43.40	BH128
West Bulk Truck Loadout	EU712	100	B	51.28	BH129
Bulk Railroad Loadout	EU713	100	B	51.28	BH130
East Bulk Truck Loadout	EU706	45	B	43.60	BH131
Truck / Rail Unloading Silos 11/12	EU701	100	B	51.28	BH132
Truck / Rail Unloading Silo 15	EU702	100	B	51.28	BH133
Storage Silos 13/14/16/17/18	EU704	100	B	51.28	BH126
Wet Fly Ash Unloading, Pneumatic	EU210	15	A	25.16	BH138
Masonry Packer	EU802	44	B	43.40	BH128/139
Waste Dust Tank	EU406	15	A	25.16	BH142
CKD2FM Recycle Tank	EU902	14	A	24.03	BH143
Limestone Stockpile	EU103	149	B	55.37	uncontrolled
Two Wet Fly Ash Piles	EU106/107	8	A	16.51	uncontrolled
Raw Material Loading	EU112	210	B	59.04	uncontrolled
Raw Material Unloading	EU114	189	B	57.90	uncontrolled
Apron Feeder	EU115	550	B	70.10	uncontrolled
Screen Transfers	EU120	550	B	70.10	uncontrolled
Belt 2 Conveyor	EU121	300	B	63.00	uncontrolled
Belt 3 Conveyor	EU201	550	B	70.10	uncontrolled
Discharge Hopper Screw 1	EU402	15	A	25.16	uncontrolled
Discharge Hopper Screw 2	EU402	15	A	25.16	uncontrolled
Discharge Hopper Screw 3	EU402	15	A	25.16	uncontrolled
Discharge Hopper Screw 4	EU402	15	A	25.16	uncontrolled
Discharge Hopper Screw 5	EU402	15	A	25.16	uncontrolled
16" Cross Screw	EU403	15	A	25.16	uncontrolled
#1 Waste Dust Elevator	EU404	15	A	25.16	uncontrolled

Emission Unit	Unit ID	Throughput (ton/hr)	Method	PM Limit (lb/hr)	Control Unit ID
9" Cross Screw	EU405	15	A	25.16	uncontrolled
Discharge Hopper Screw 1	EU414	15	A	25.16	uncontrolled
Discharge Hopper Screw 2	EU414	15	A	25.16	uncontrolled
Discharge Hopper Screw 3	EU414	15	A	25.16	uncontrolled
Discharge Hopper Screw 4	EU414	15	A	25.16	uncontrolled
Discharge Hopper Screw 5	EU414	15	A	25.16	uncontrolled
16" Cross Screw	EU415	15	A	25.16	uncontrolled
#2 Waste Dust Elevator	EU416	15	A	25.16	uncontrolled
Waste CKD Truck Load	EU407	30	A	40.04	uncontrolled
Waste CKD Dust Pile	EU423	21	A	31.53	uncontrolled
Limestone Storage Bins	EU202	181	B	57.43	uncontrolled
Clinker Bin 1 Finish Mill 1	EU505	41	B	42.75	uncontrolled
Stone/Clinker Bin 2 Finish Mill 1	EU506	44	B	43.40	uncontrolled
Clinker Bin 3 Finish Mill 1	EU507	46	B	43.80	uncontrolled
Crane Unloading	EU510	46	B	43.80	uncontrolled
Clinker Bin 1 Finish Mill 2	EU520	41	B	42.75	uncontrolled
Clinker Bin 2 Finish Mill 2	EU521	41	B	42.75	uncontrolled
Belt Feeder 1	EU205	45	B	43.60	uncontrolled
Belt Feeder 2	EU205	45	B	43.60	uncontrolled
Belt Feeder 3	EU205	45	B	43.60	uncontrolled
Iron Ore Feeder	EU207	45	B	43.60	uncontrolled
Clinker Bin #1 Feeder	EU508	45	B	43.60	uncontrolled
Transfer to Pallets/Masonry	EU803	44	B	43.40	uncontrolled
Transfer to Pallets/Portland	EU806	44	B	43.40	uncontrolled

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

- (a) Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

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

$$E = 55.0 P^{0.11} - 40$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (c) Pursuant to 326 IAC 6-3-2(e)(3), when the process weight exceeds 200 tons per hour, the maximum allowable emissions may exceed the emission limits shown paragraph (b), provided the concentration of particulate matter in the gas discharged to the atmosphere is less than 0.10 pounds per 1,000 pounds of gases.

D.1.2 PSD Minor Limits [326 IAC 2-2]

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

- (a) PM and PM10 emissions shall be limited as follows:

Emission Unit	PM Emission Limitation (lb/ton of CKD)	PM10 Emission Limitation (lb/ton of CKD)
CKD2FM recycling storage tank system (EU902)	0.72	0.46
CKD2FM #1 FM recycling system (EU903)	0.003	0.0011
CKD2FM #2 FM recycling system (EU904)	0.003	0.0011

- (b) The Permittee shall limit the throughput of CKD per twelve consecutive month period, with compliance determined at the end of each month, according to the following:

Emission Unit	CKD Throughput (ton/year)
CKD2FM recycling storage tank system (EU902)	65,000
CKD2FM #1 FM recycling system (EU903)	65,000 combined
CKD2FM #2 FM recycling system (EU904)	

Compliance with the above limits will assure that total PM and PM10 emissions from Minor Source Modification 017-22319-00005 shall be less than 25 and 15 tons per year, respectively. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) are rendered not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the emission control devices listed in this section. 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 2-7-5(1)]

D.1.4 Particulate Control

- (a) In order to comply with Condition D.1.1 - Particulate Emissions, the baghouse for particulate control shall be in operation and control emissions at all times an associated facility, as listed in the table below, is in operation:

Emission Unit	Unit ID	Control Unit ID
Pneumatic Fly Ash Unloading	EU213	BH103
East Fly Ash Storage Bin	EU214	
Inside Wet Fly Ash Tank	EU211	BH104
#1 Recycled Dust Elevator	EU408	BH106
Recycled Dust Holding Tank	EU409	
#2 Recycled Dust Elevator	EU417	BH106
Recycled Dust Holding Tank	EU418	
Storage Silos	EU709	BH122
Storage Silos	EU711	BH124
West Bulk Truck Loadout	EU712	BH129
Bulk Railroad Loadout	EU713	BH130

Emission Unit	Unit ID	Control Unit ID
East Bulk Truck Loadout	EU706	BH131
Truck / Rail Unloading Silos 11/12	EU701	BH132
Truck / Rail Unloading Silo 15	EU702	BH133
Storage Silos 13/14/16/17/18	EU704	BH126
Wet Fly Ash Unloading, Pneumatic	EU210	BH138
Waste Dust Tank	EU406	BH142
CKD2FM Recycle Tank	EU902	BH143

- (b) 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.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate compliance with Condition D.1.4 - Particulate Emissions, the Permittee shall perform PM testing on the Finish Mill #1 (EU601 through EU603) and Finish Mill #2 (EU604 through EU606) utilizing methods as approved by the Commissioner at least once every five (5) years from the date of the most recent valid stack test demonstration. Testing shall be in accordance with the provisions of 326 IAC 3-6 (Source Sampling Procedures). Section C- Performance Testing contains the Permittee's obligation with regards to the performance testing required by this condition. All associated facilities exhausting to a single stack must all be operating when determining compliance with the limit.

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

D.1.6 Visible Emissions Notations [40 CFR 64]

- (a) Daily visible emission notations of the stack exhausts of the baghouses controlling emissions from the processes listed in Condition D.1.4(a) shall be performed 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, at least 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 required by this condition. An abnormal reading is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (f) Compliance with these monitoring requirements along with the monitoring requirements contained in Condition D.1.7 satisfies CAM for the emission units listed in the table below:

Emission Unit	Unit ID	Control Unit ID
Pneumatic Fly Ash Unloading	EU213	BH103
East Fly Ash Storage Bin	EU214	
Inside Wet Fly Ash Tank	EU211	BH104
#1 Recycled Dust Elevator	EU408	BH106
Recycled Dust Holding Tank	EU409	
#2 Recycled Dust Elevator	EU417	BH106
Recycled Dust Holding Tank	EU418	
Storage Silos	EU709	BH122
Storage Silos	EU711	BH124
West Bulk Truck Loadout	EU712	BH129
Bulk Railroad Loadout	EU713	BH130
East Bulk Truck Loadout	EU706	BH131
Truck / Rail Unloading Silos 11/12	EU701	BH132
Truck / Rail Unloading Silo 15	EU702	BH133
Storage Silos 13/14/16/17/18	EU704	BH126
Wet Fly Ash Unloading, Pneumatic	EU210	BH138
Waste Dust Tank	EU406	BH142
CKD2FM Recycle Tank	EU902	BH143

D.1.7 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall record the pressure drop across each baghouse listed in Condition D.1.4(a), at least once per day when the associated process is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range the Permittee shall take a reasonable response. The normal range for this unit is a pressure drop between 1.0 and 8.0 inches of water unless a different upper-bound or lower-bound value for this range is determined during the latest stack test. Section C – Response to Excursions and Exceedances contains the Permittee's obligation with regard to the reasonable response required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.
- (c) Compliance with these monitoring requirements along with the monitoring requirements contained in Condition D.1.6 satisfies CAM for the emission units listed in the table below:

Emission Unit	Unit ID	Control Unit ID
Pneumatic Fly Ash Unloading	EU213	BH103
East Fly Ash Storage Bin	EU214	
Inside Wet Fly Ash Tank	EU211	BH104
#1 Recycled Dust Elevator	EU408	BH106
Recycled Dust Holding Tank	EU409	
#2 Recycled Dust Elevator	EU417	BH106
Recycled Dust Holding Tank	EU418	

Emission Unit	Unit ID	Control Unit ID
Storage Silos	EU709	BH122
Storage Silos	EU711	BH124
West Bulk Truck Loadout	EU712	BH129
Bulk Railroad Loadout	EU713	BH130
East Bulk Truck Loadout	EU706	BH131
Truck / Rail Unloading Silos 11/12	EU701	BH132
Truck / Rail Unloading Silo 15	EU702	BH133
Storage Silos 13/14/16/17/18	EU704	BH126
Wet Fly Ash Unloading, Pneumatic	EU210	BH138
Waste Dust Tank	EU406	BH142
CKD2FM Recycle Tank	EU902	BH143

D.1.8 Broken or Failed Bag Detection

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- (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 emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

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 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

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- (a) To document the compliance status with Condition D.1.6, the Permittee shall maintain daily records of the visible emission notations of the stack exhausts of the baghouses controlling emissions from the processes listed in Condition D.1.4(a). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of a visible emission notation (e.g., the process did not operate that day).
- (b) To document the compliance status with Condition D.1.7(a), the Permittee shall maintain daily records of the pressure across the baghouses listed in Condition D.1.7(a). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g., the process did not operate that day).
- (c) To document the compliance status with Condition D.1.7(b), the Permittee shall maintain records of the replacement and calibration of each pressure instrument used to measure pressure drop across the baghouses listed in Condition D.1.7(b). If the time between replacement and/or calibration exceeds six (6) months, the Permittee shall maintain records of the manufacturer's specifications recommending the longer time period.

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

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NO_x emissions controlled with a selective non-catalytic reduction (SNCR) system and water injection system, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]
- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a water injection system for NO_x emissions control, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

(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 2-7-5(1)]

D.2.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 7-2-1]

- (a) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the combustion of coal or the simultaneous combustion of coal and oil, in Kiln #1 and Kiln #2 shall not exceed six (6.0) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.
- (b) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the combustion of fuel oil only from each of the kilns shall not exceed five tenths (0.5) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.
- (c) Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the combustion of residual oil only from each of the kilns shall not exceed one and six-tenths (1.6) pounds per MMBtu heat input. Pursuant to 326 IAC 7-2-1, compliance shall be demonstrated on a calendar month average.

D.2.2 Sulfur Dioxide (SO₂) Emission Limitation [U.S. EPA Consent Decree]

- (a) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, SO₂ emissions from Kiln #1, identified as EU401, shall not exceed 3.5 pounds per ton of clinker produced, based on a 30-day rolling average.

- (b) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, SO₂ emissions from Kiln #2, identified as EU413, shall not exceed 4.8 pounds per ton of clinker produced, based on a 30-day rolling average.

D.2.3 Nitrogen Oxide (NO_x) Emission Limitation [U.S. EPA Consent Decree]

Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016 and October 5, 2017, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-39447-00005, NO_x emissions from Kiln #2, identified as EU413, shall not exceed 4.75 pounds per ton of clinker produced, based on a 30-day rolling average.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the emission control devices listed in this section. 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 2-7-5(1)]

D.2.5 Sulfur Dioxide (SO₂) Control [U.S. EPA Consent Decree]

- (a) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, and in order to assure compliance with Condition D.2.2(a), the cement kiln dust (CKD) injection system associated with Kiln #1 shall be continuously operated at all times Kiln #1 is in operation. "Continuously operated" means that the CKD injection system shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the CKD injection system and Kiln #1.
- (b) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, and in order to assure compliance with Condition D.2.2(b), the cement kiln dust (CKD) injection system associated with Kiln #2 shall be continuously operated at all times Kiln #2 is in operation. "Continuously operated" means that the CKD injection system shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the CKD injection system and Kiln #2.

D.2.6 Nitrogen Oxide (NO_x) Control [U.S. EPA Consent Decree]

- (a) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, modified on January 4, 2016 and October 5, 2017, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-39447-00005, the Permittee shall install a selective non-catalytic reduction (SNCR) system and a water injection system on Kiln #1, and shall continuously operate the SNCR system and water injection system at all times when Kiln #1 is in operation. "Continuously operate" means that the SNCR and water injection systems shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the SNCR system, water injection system and Kiln #1.
- (b) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, modified on January 4, 2016 and October 5, 2017, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-39447-00005, and in order to assure compliance with Condition D.2.3,

the Permittee shall install a water injection system on Kiln #2, and shall continuously operate the water injection system at all times when Kiln #2 is in operation. "Continuously operate" means that the water injection system shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the water injection system and Kiln #2.

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

D.2.7 Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)] [U.S. EPA Consent Decree]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) continuous opacity monitoring systems (COMS) for kiln #1 (EU401) and kiln #2 (EU413) shall be calibrated, maintained, and operated for measuring opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 and 40 CFR 63, Subpart EEE.
- (d) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, an SO₂ Continuous Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60 and 326 IAC 3-5, to demonstrate compliance with the SO₂ emission limit in Condition D.2.2(a) for Kiln #1.
- (e) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, an SO₂ Continuous Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60 and 326 IAC 3-5, to demonstrate compliance with the SO₂ emission limit in Condition D.2.2(b) for Kiln #2.
- (f) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, an ammonia continuous emissions monitoring system (CEMS) shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60 and 326 IAC 3-5 for Kiln #1.
- (g) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, a NO_x Continuous Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60 and 326 IAC 3-5 for Kiln #1.
- (h) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, a NO_x Continuous Monitoring System (CEMS) shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60 and 326 IAC 3-5 for Kiln #2.

D.2.8 Visible Emissions Notations

Whenever a COMS is malfunctioning or down for maintenance, or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online not later than twenty-four (24) hours of shutdown

or malfunction of the primary COMS, and the process is operating, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

- (a) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.
- (b) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
- (c) Method 9 readings may be discontinued once a COM is online.
- (d) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

D.2.9 Continuous Emissions Monitoring System (CEMS) Downtime [U.S. EPA Consent Decree]

- (a) The SO₂ CEMS shall be in operation and measuring SO₂ emissions at all times Kiln #1 is in operation, except during CEMS breakdown, repairs, calibration checks, and zero span adjustments. During any time with the Kiln #1 SO₂ CEMS is inoperable and otherwise not measuring emissions of SO₂ from Kiln #1, the Permittee shall apply the missing data procedures pursuant to Consent Decree 2:11-cv-01650-DSC, Paragraph 29. Pursuant to significant source modification 017-37701-00005 and Consent Decree 2:11-cv-01650-DSC, Paragraph 29, for missing data periods lasting less than 24 hours, The Permittee shall substitute the average of the hourly concentrations recorded by a pollutant monitor for the hour before and the hour after that missing data period. For missing data periods lasting more than 24 hours, the Permittee shall substitute the average hourly concentrations recorded by a pollutant monitor for the 24 hours before that missing data period.
- (b) Pursuant to 326 IAC 3-5-8(d), whenever the SO₂ CEMS for Kiln #1 is offline for more than twenty-four (24) hours and a backup CEMS is not brought online, the Permittee shall monitor and record the cement kiln dust (CKD) injection rate once per shift and each time the CKD injection rate is adjusted. When, for any reading, the CKD injection rate for Kiln #1 is different than the value calculated to assure compliance with the SO₂ emission limitation contained in Condition D.2.2(a) under the operating conditions encountered during the SO₂ CEMS outage, 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 required by this condition. A CKD injection rate reading different than the calculated value is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.
- (c) The SO₂ CEMS shall be in operation and measuring SO₂ emissions at all times Kiln #2 is in operation, except during CEMS breakdown, repairs, calibration checks, and zero span adjustments. During any time with the Kiln #2 SO₂ CEMS is inoperable and otherwise not measuring emissions of SO₂ from Kiln #2, the Permittee shall apply the missing data procedures pursuant to Consent Decree 2:11-cv-01650-DSC, Paragraph 29. Pursuant to significant source modification 017-37701-00005 and Consent Decree 2:11-cv-01650-DSC, Paragraph 29, for missing data periods lasting less than 24 hours, the Permittee shall substitute the average of the hourly concentrations recorded by a pollutant monitor for the hour before and the hour after that missing data period. For missing data periods lasting more than 24 hours, the Permittee shall substitute the average hourly concentrations recorded by a pollutant monitor for the 24 hours before that missing data period.
- (d) Pursuant to 326 IAC 3-5-8(d), whenever the SO₂ CEMS for Kiln #2 is offline for more than twenty-four (24) hours and a backup CEMS is not brought online, the Permittee shall monitor and record the cement kiln dust (CKD) injection rate once per shift and each time the CKD

injection rate is adjusted. When, for any reading, the CKD injection rate for Kiln #2 is different than the value calculated to assure compliance with the SO₂ emission limitation contained in Condition D.2.2(b) under the operating conditions encountered during the SO₂ CEMS outage, 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 required by this condition. A CKD injection rate reading different than the calculated value is not a deviation from this permit. Failure to take a reasonable response shall be considered a deviation from this permit.

- (e) The NO_x CEMS shall be in operation and measuring NO_x emissions at all times Kiln #1 is in operation, except during CEMS breakdown, repairs, calibration checks, and zero span adjustments. During any time the Kiln #1 NO_x CEMS is inoperable and otherwise not measuring emissions of NO_x from Kiln #1, the Permittee shall apply the missing data procedures pursuant to Consent Decree 2:11-cv-01650-DSC, Paragraph 23. Pursuant to significant source modification 017-37701-00005 and Consent Decree 2:11-cv-01650-DSC, Paragraph 23, the Permittee shall apply the missing data substitution procedures in 40 CFR 75, Subpart D.
- (f) The NO_x CEMS shall be in operation and measuring NO_x emissions at all times Kiln #2 is in operation, except during CEMS breakdown, repairs, calibration checks, and zero span adjustments. During any time the Kiln #2 NO_x CEMS is inoperable and otherwise not measuring emissions of NO_x from Kiln #2, the Permittee shall apply the missing data procedures pursuant to Consent Decree 2:11-cv-01650-DSC, Paragraph 23. Pursuant to significant source modification 017-37701-00005 and Consent Decree 2:11-cv-01650-DSC, Paragraph 23, the Permittee shall apply the missing data substitution procedures in 40 CFR 75, Subpart D.

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

D.2.10 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.1 - Sulfur Dioxide (SO₂), the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be complete and sufficient to determine the compliance status with the SO₂ emission limits established in D.2.1 - Sulfur Dioxide (SO₂).
 - (1) Calendar dates covered in the compliance determination period;
 - (2) Actual coal, fuel oil, and residual oil usage since last compliance determination period;
 - (3) Sulfur content and heat content of the coal, fuel oil, and residual oil;
 - (4) Sulfur dioxide emission rates.
- (b) To document the compliance status with Section C - Opacity, Condition, D.2.7 - Continuous Emissions Monitoring, and Condition D.2.8 - Visible Emissions Notations, the Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine the compliance status with the limits established in Section C - Opacity.
 - (1) Data and results from the most recent performance specifications tests, pursuant to 326 IAC 3-5-3.
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5.
 - (3) The results of all method 9 visible emission readings taken during any periods of COMS downtime.

- (c) To document the compliance status with Condition D.2.9(b), the Permittee shall maintain once per shift records, during CEMS downtime, of the CKD injection rate to Kiln #1. The Permittee shall include in its once per shift record when a CKD injection rate reading is not taken and the reason for the lack of a CKD injection rate reading (e.g., the process did not operate that day).
- (d) To document the compliance status with Condition D.2.9(b), the Permittee shall maintain records of all calculations used to establish the appropriate CKD feed rate during SO₂ CEMS downtime intended to assure compliance with the SO₂ emission limitation contained in Condition D.2.2(a), based on kiln operating conditions during the SO₂ CEMS outage.
- (e) To document the compliance status with Condition D.2.9(d), the Permittee shall maintain once per shift records, during CEMS downtime, of the CKD injection rate to Kiln #2. The Permittee shall include in its once per shift record when a CKD injection rate reading is not taken and the reason for the lack of a CKD injection rate reading (e.g., the process did not operate that day).
- (f) To document the compliance status with Condition D.2.9(d), the Permittee shall maintain records of all calculations used to establish the appropriate CKD feed rate during SO₂ CEMS downtime intended to assure compliance with the SO₂ emission limitation contained in Condition D.2.2(b), based on kiln operating conditions during the SO₂ CEMS outage.
- (g) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.2.11 Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document the compliance status with Condition D.2.7 - Continuous Emissions Monitoring shall be submitted not later than thirty (30) days after the end of the quarter being reported.
- (b) Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.
- (c) The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (d) Reports shall be submitted pursuant to Section XII of the Consent Decree.
- (e) Pursuant to 326 IAC 3-5-7(c)(4), reporting of continuous monitoring system instrument downtime, except for zero (0) and span checks, which shall be reported separately, shall include the following:
 - (1) Date of downtime.
 - (2) Time of commencement.
 - (3) Duration of each downtime.
 - (4) Reasons for each downtime.
 - (5) Nature of system repairs and adjustments.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Clinker Cooler #1 Facilities

- (127) One (1) clinker cooler #1, identified as EU412, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE404), and exhausting to one (1) stack, identified as EP404.
[40 CFR 63, Subpart LLL]

Clinker Cooler #2 Facilities

- (128) One (1) clinker cooler #2, identified as EU421, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP404.
[40 CFR 63, Subpart LLL]

(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 2-7-5(1)]

D.3.1 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the emission control devices listed in this section. 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 2-7-5(1)]

D.3.2 Continuous Opacity Monitoring [326 IAC 3-5]

- (a) Pursuant to 326 IAC 3-5 (Continuous Monitoring of Emissions) continuous opacity monitoring systems (COMS) for clinker cooler #1 (EU412) and clinker cooler #2 (EU421) shall be calibrated, maintained, and operated for measuring opacity, which meet all applicable performance specifications of 326 IAC 3-5-2.
- (b) All continuous emission monitoring systems are subject to monitor system certification requirements pursuant to 326 IAC 3-5-3.
- (c) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous emission monitoring system pursuant to 326 IAC 3-5 and 40 CFR 63, Subpart LLL.

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

D.3.3 Visible Emissions Notations

Whenever a COMS is malfunctioning or down for maintenance, or repairs for a period of twenty-four (24) hours or more and a backup COMS is not online not later than twenty-four (24) hours of shutdown or malfunction of the primary COMS, and the process is operating, the Permittee shall provide a certified opacity reader, who may be an employee of the Permittee or an independent contractor, to self-monitor the emissions from the emission unit stack.

- (a) Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

- (b) Method 9 opacity readings shall be repeated for a minimum of five (5) consecutive six (6) minute averaging periods at least twice per day during daylight operations, with at least four (4) hours between each set of readings, until a COMS is online.
- (c) Method 9 readings may be discontinued once a COM is online.
- (d) Any opacity exceedances determined by Method 9 readings shall be reported with the Quarterly Opacity Exceedances Reports.

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

D.3.4 Record Keeping Requirements

- (a) To document the compliance status with Section C - Opacity, Condition D.3.2 - Continuous Emissions Monitoring, and Condition D.3.3 - Visible Emissions Notations, the Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine the compliance status with the limits established in Section C - Opacity and Condition D.3.3 - Visible Emissions Notations.
 - (1) Data and results from the most recent performance specifications tests, pursuant to 326 IAC 3-5-3.
 - (2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5.
 - (3) The results of all method 9 visible emission readings taken during any periods of COMS downtime.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

D.3.5 Reporting Requirements

A quarterly summary of excess opacity emissions, as defined in 326 IAC 3-5-7, from the continuous monitoring system shall be submitted not later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition. The reports submitted by the Permittee do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Hazardous Waste Derived Fuel System Operations

- (133) Four (4) liquid hazardous waste-derived fuel storage tanks, approved for construction in 2010, identified collectively as EU906, with maximum capacities of 39,800 gallons each, vented to one (1) activated carbon canister system or a kiln/cooler for VOC control.
[40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF]
- (134) One (1) bulk solids management system, approved for construction in 2010, producing 58,400,000 gallons of blended fuel per year, consisting of: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF]
- (i) One (1) feed hopper and two (2) augers contained inside the solids management building and two (2) screw conveyors, collectively identified as EU908, and all associated equipment with HAP and VOC emissions routed to a kiln/cooler for control; and
 - (ii) One (1) hydropulper tank with a maximum capacity of 3,750 gallons and one (1) level control tank with a maximum capacity of 3,500 gallons, collectively identified as EU907 with all associated equipment, vented to one (1) activated carbon canister system or a kiln/cooler for HAP and VOC control.

Insignificant Activities:

- (c) Three (3) natural gas-fired boilers, collectively identified as EU909, utilizing low-NO_x burners, approved for construction in 2010, with a total maximum heat input capacity of 1.8 MMBtu/hr (0.6 MMBtu/hr, each). [326 IAC 6-2-4]

(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 2-7-5(1)]

D.4.1 PSD Minor Limit [326 IAC 2-2]

VOC emissions from the four (4) storage tanks, collectively identified as EU906, the bulk solids material handling and management system, identified as EU908 and EU907 respectively, shall not exceed 39.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. The Permittee shall comply with the following:

- (a) The emissions from the four (4) storage tanks, collectively identified as EU906, and the bulk solids management system, identified as EU907, shall be captured and routed to either a kiln/cooler or the activated carbon canister system for VOC emission control. The source shall maintain 100% capture efficiency and at least 95% removal efficiency to control emissions from these emissions units.
- (b) The emissions from the bulk solids material handling system, collectively identified as EU908, shall be captured and routed to a kiln/cooler for VOC emission control. The source shall maintain at least 80% capture efficiency and 99% destruction efficiency to control emissions from these emissions units.
- (c) When neither kiln/cooler is operating, EU908 shall not be operated.

Compliance with these requirements will assure that the potential to emit from this modification is less than forty (40) tons of VOC per twelve (12) consecutive month period and, therefore, will render the requirements of 326 IAC 2-2 not applicable.

D.4.2 Particulate Matter [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(d), particulate emissions from the three (3) boilers, identified collectively as EU909, shall not exceed 0.6 lb/MMBtu each.

D.4.3 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the bulk solids material handling, identified collectively as EU908, shall not exceed 30.51 pounds per hour when operating at a process weight rate of twenty (20) tons per hour. The pound per hour limitation was calculated with the following equation:

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

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

D.4.4 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for the emissions units and any associated control devices listed in this section, excluding the storage tanks collectively identified as EU906. Section B - Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plans required by this Condition.

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.4.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

In order to demonstrate the compliance status with Condition D.4.1 - PSD Minor Limit, the Permittee shall perform VOC capture and removal testing on the four (4) storage tanks, collectively identified as EU906, and the bulk solids material handling and management system, identified as EU908 and EU907 respectively, utilizing methods as approved by the Commissioner. These tests shall be conducted within 180 days after initial start-up. These tests shall be repeated at least once every five (5) years, unless otherwise stated below. 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. All associated facilities exhausting to a single stack must all be operating when determining compliance with the limit.

- (a) Capture efficiency testing for EU906, EU907 and EU909 may be satisfied by including the emission units in the leak detection monitoring program (LDAR) Program.
- (b) Destruction efficiency testing for emission units which have emissions routed to a kiln/cooler for VOC control may be satisfied by the VOC destruction removal efficiency (DRE) testing on the kiln system that is performed as part of the required HWC MACT compliance testing.
- (c) Removal efficiency testing for emission units which have emissions routed to the activated carbon canister system for VOC control may be satisfied by testing of the inlet and outlet of the carbon system to demonstrate 95% VOC removal efficiency.

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

D.4.6 Parametric Monitoring

- (a) The Permittee shall maintain a negative air flow pressure for the bulk solids management building as indicated by differential pressure gauges across the building inlets and outlets.

- (b) To demonstrate that a negative air flow pressure is achieved, the Permittee shall install differential pressure gauges at each of the building inlets and outlets, and measure and record the differential pressure across the inlets and outlets of the building at least once per day.

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

D.4.7 Record Keeping Requirements

- (a) To document the compliance status of Condition D.4.1 - PSD Minor Limit, the Permittee shall maintain records of the differential pressure across the building inlets and outlets as specified in Condition D.4.6 - Parametric Monitoring.
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6, including one parts washer constructed in 1991. [326 IAC 8-3-2] [326 IAC 8-3-8]

(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 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2, for the degreasing operations, the Permittee shall:
- (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 8-3-2, the owner or operator of a cold cleaner degreaser subject to this subsection shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.

- (3) If used, solvent spray:
 - (A) must be a solid, fluid stream; and
 - (B) shall be applied at a pressure that does not cause excessive splashing.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Pursuant to 326 IAC 8-3-8 (Material Requirements for Cold Cleaner Degreasers), on and after January 1, 2015, the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure than exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).

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

D.5.3 Record Keeping Requirements

- (a) Pursuant to 326 IAC 8-3-8(c)(2), on and after January 1, 2015, the following records shall be maintained for each purchase of cold cleaner degreaser solvent:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill dates of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased.
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligation with regard to the records required by this condition.

SECTION E.1

NESHAP - 40 CFR 61, Subpart V

Emissions Unit Description:

Hazardous Waste Derived Fuel System Operations

- (133) Four (4) liquid hazardous waste-derived fuel storage tanks, approved for construction in 2010, identified collectively as EU906, with maximum capacities of 39,800 gallons each, vented to one (1) activated carbon canister system or a kiln/cooler for VOC control.
[40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (134) One (1) bulk solids management system, approved for construction in 2010, producing 58,400,000 gallons of blended fuel per year, consisting of: [40 CFR 63, Subpart DD]
[40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (i) One (1) feed hopper and two (2) augers contained inside the solids management building and two (2) screw conveyors, collectively identified as EU908, and all associated equipment with HAP and VOC emissions routed to a kiln/cooler for control; and
 - (ii) One (1) hydropulper tank with a maximum capacity of 3,750 gallons and one (1) level control tank with a maximum capacity of 3,500 gallons, collectively identified as EU907 with all associated equipment, vented to one (1) activated carbon canister system or a kiln/cooler for HAP and VOC control.

Insignificant Activities:

- (b) Hazardous Waste Fuel Facility: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF]
[40 CFR 61, Subpart V]
- (1) Waste Management Units
 - (i) Ten (10) hazardous waste-derived fuel storage tanks, installed in 1987 and 1994, with capacities ranging from 22,000-39,000 gallons. All tanks are connected to an integrated emission control system.
 - (ii) Carbon Steel Piping System
 - (iii) Tank Rail Cars and Trucks
 - (2) Equipment components
 - (i) Valves
 - (ii) Pumps
 - (iii) AWFCO Valves
 - (3) Caps (hose end covers)
 - (4) Flanges
 - (5) Manways
 - (6) Flame Arrestors
 - (7) Filter Pots
 - (8) Micro-motion Flow Meters
 - (9) Level Transmitters

- (10) Pressure Indicators
- (11) Pressure Transmitters
- (12) Emergency Conservation Vent
- (13) Carbon Canister VOC Monitor
- (14) Tank Emergency Relief Ports
- (15) High Level Probes
- (16) Activated Carbon Canister System

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.1.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 [326 IAC 14-1] [40 CFR Part 61, Subpart A]

- (a) Pursuant to 40 CFR 61, the Permittee shall comply with the provisions of 40 CFR Part 61, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 14-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 61, Subpart V.
- (b) Pursuant to 40 CFR 61.04, the Permittee shall submit all required notifications and reports 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

E.1.2 National Emission Standard for Equipment Leaks (Fugitive Emission Sources) NESHAP [40 CFR Part 61, Subpart V] [326 IAC 14-8]

The Permittee shall comply with the following provisions of 40 CFR Part 61, Subpart V (included as Attachment A to the operating permit), which are incorporated by reference as 326 IAC 14-8, for the emission units listed above:

- (1) 40 CFR 61.240 (a), (b), and (c);
- (2) 40 CFR 61.241;
- (3) 40 CFR 61.242-1;
- (4) 40 CFR 61.242-2;
- (5) 40 CFR 61.242-3;
- (6) 40 CFR 61.242-4;
- (7) 40 CFR 61.242-5;
- (8) 40 CFR 61.242-6;
- (9) 40 CFR 61.242-7;
- (10) 40 CFR 61.242-8;
- (11) 40 CFR 61.242-10;
- (12) 40 CFR 61.242-11 (a), (b), (c), (e), (f), (g), (h), (i), (j), (k), (l), and (m);
- (13) 40 CFR 61.245 (a), (b), (c), and (d);
- (14) 40 CFR 61.246 (a), (b), (c), (d), (e), (f), (h), (i), and (j);
- (15) 40 CFR 61.247 (a)(1), (2), (3), and (5);
- (16) 40 CFR 61.247(b);
- (17) 40 CFR 61.247(c);
- (18) 40 CFR 61.247(e);

- (19) Table 1 to Subpart V Part 61; and
- (20) Table 2 to Subpart V Part 61.

SECTION E.2

NESHAP - 40 CFR 61, Subpart FF

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NO_x emissions controlled with a selective non-catalytic reduction (SNCR) system and a water injection system, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]
- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a water injection system for NO_x emissions control, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

Hazardous Waste Derived Fuel System Operations

- (133) Four (4) liquid hazardous waste-derived fuel storage tanks, approved for construction in 2010, identified collectively as EU906, with maximum capacities of 39,800 gallons each, vented to one (1) activated carbon canister system or a kiln/cooler for VOC control. [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (134) One (1) bulk solids management system, approved for construction in 2010, producing 58,400,000 gallons of blended fuel per year, consisting of: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (i) One (1) feed hopper and two (2) augers contained inside the solids management building and two (2) screw conveyors, collectively identified as EU908, and all associated equipment with HAP and VOC emissions routed to a kiln/cooler for control; and
 - (ii) One (1) hydropulper tank with a maximum capacity of 3,750 gallons and one (1) level control tank with a maximum capacity of 3,500 gallons, collectively identified as EU907 with all associated equipment, vented to one (1) activated carbon canister system or a kiln/cooler for HAP and VOC control.

Insignificant Activities:

- (b) Hazardous Waste Fuel Facility: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]

- (1) Waste Management Units
 - (i) Ten (10) hazardous waste-derived fuel storage tanks, installed in 1987 and 1994, with capacities ranging from 22,000-39,000 gallons. All tanks are connected to an integrated emission control system.
 - (ii) Carbon Steel Piping System
 - (iii) Tank Rail Cars and Trucks
- (2) Equipment components
 - (i) Valves
 - (ii) Pumps
 - (iii) AWFCO Valves
- (3) Caps (hose end covers)
- (4) Flanges
- (5) Manways
- (6) Flame Arrestors
- (7) Filter Pots
- (8) Micro-motion Flow Meters
- (9) Level Transmitters
- (10) Pressure Indicators
- (11) Pressure Transmitters
- (12) Emergency Conservation Vent
- (13) Carbon Canister VOC Monitor
- (14) Tank Emergency Relief Ports
- (15) High Level Probes
- (16) Activated Carbon Canister System

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.2.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 61, the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, for the emission units listed above, except as otherwise specified in 40 CFR Part 61, Subpart FF.

(b) Pursuant to 40 CFR 61.04, the Permittee shall submit all required notifications and reports 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

E.2.2 National Emission Standards for Benzene Waste Operations NESHAP [40 CFR Part 61, Subpart FF]

The Permittee shall comply with the following provisions of 40 CFR Part 61, Subpart FF (included as Attachment B to the operating permit), for the emission units listed above:

- (1) 40 CFR 61.340;
- (2) 40 CFR 61.341;
- (3) 40 CFR 61.342;
- (4) 40 CFR 61.343 (a), (b), (c), and (d);
- (5) 40 CFR 61.345 (a), (b), and (c);
- (6) 40 CFR 61.348;
- (7) 40 CFR 61.349 (a)(1), (a)(2)(ii), and (a)(2)(iv);
- (8) 40 CFR 61.349 (b), (c), (e), (f), (g), and (h);
- (9) 40 CFR 61.350;
- (10) 40 CFR 61.354 (a), (b), (c)(5), (c)(9), (d), (e), and (f);
- (11) 40 CFR 61.355 (a), (b)(3), (b)(4), (b)(5), (b)(6), and (b)(7);
- (12) 40 CFR 61.355 (c)(1)(i)(C), and (c)(1)(i)(D);
- (13) 40 CFR 61.355 (c)(1)(ii), (c)(1)(iii), (c)(1)(iv), and (c)(1)(v);
- (14) 40 CFR 61.355 (c)(2), (c)(3);
- (15) 40 CFR 61.355 (d), (e), (f), (h), (i), (j), and (k);
- (16) 40 CFR 61.356 (a), (b)(1), (b)(2), and (b)(4);
- (17) 40 CFR 61.356 (c), (d), (e), (f)(1), (f)(2)(i)(C), (f)(2)(i)(G), (f)(2)(i)(H), (f)(3), (g), (h), and (i);
- (18) 40 CFR 61.356 (j)(1), (j)(2), (j)(3), (j)(6), (j)(9), (j)(10), (j)(11), and (j)(12);
- (19) 40 CFR 61.357(a), (b), and (c);
- (20) 40 CFR 61.357 (d)(1), (d)(2), (d)(3), (d)(5), and (d)(6);
- (21) 40 CFR 61.357 (d)(7)(i), (d)(7)(ii), (d)(7)(iii), and (d)(8); and
- (22) 40 CFR 61.358.

SECTION E.3

NESHAP - 40 CFR 63, Subpart DD

Emissions Unit Description:

Hazardous Waste Derived Fuel System Operations

- (133) Four (4) liquid hazardous waste-derived fuel storage tanks, approved for construction in 2010, identified collectively as EU906, with maximum capacities of 39,800 gallons each, vented to one (1) activated carbon canister system or a kiln/cooler for VOC control.
[40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (134) One (1) bulk solids management system, approved for construction in 2010, producing 58,400,000 gallons of blended fuel per year, consisting of: [40 CFR 63, Subpart DD]
[40 CFR 61, Subpart FF] [40 CFR 61, Subpart V]
- (i) One (1) feed hopper and two (2) augers contained inside the solids management building and two (2) screw conveyors, collectively identified as EU908, and all associated equipment with HAP and VOC emissions routed to a kiln/cooler for control; and
 - (ii) One (1) hydropulper tank with a maximum capacity of 3,750 gallons and one (1) level control tank with a maximum capacity of 3,500 gallons, collectively identified as EU907 with all associated equipment, vented to one (1) activated carbon canister system or a kiln/cooler for HAP and VOC control.

Insignificant Activities:

- (b) Hazardous Waste Fuel Facility: [40 CFR 63, Subpart DD] [40 CFR 61, Subpart FF]
[40 CFR 61, Subpart V]
- (1) Waste Management Units
 - (i) Ten (10) hazardous waste-derived fuel storage tanks, installed in 1987 and 1994, with capacities ranging from 22,000-39,000 gallons. All tanks are connected to an integrated emission control system.
 - (ii) Carbon Steel Piping System
 - (iii) Tank Rail Cars and Trucks
 - (2) Equipment components
 - (i) Valves
 - (ii) Pumps
 - (iii) AWFCO Valves
 - (3) Caps (hose end covers)
 - (4) Flanges
 - (5) Manways
 - (6) Flame Arrestors
 - (7) Filter Pots

- (8) Micro-motion Flow Meters
- (9) Level Transmitters
- (10) Pressure Indicators
- (11) Pressure Transmitters
- (12) Emergency Conservation Vent
- (13) Carbon Canister VOC Monitor
- (14) Tank Emergency Relief Ports
- (15) High Level Probes
- (16) Activated Carbon Canister System

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.3.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart DD.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.3.2 National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations NESHAP [40 CFR Part 63, Subpart DD] [326 IAC 20-23]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart DD (included as Attachment C to the operating permit), which are incorporated by reference as 326 IAC 20-23, for the emission units listed above:

- (1) 40 CFR 63.680 (a), (b), (c)(1), (c)(3), (e), (f), and (g);
- (2) 40 CFR 63.681;
- (3) 40 CFR 63.683 (a), (b)(1)(i), (b)(2)(i), (d), (e), and (f);
- (4) 40 CFR 63.685 (a), (b)(1), (c), (d)(3), and (g);
- (5) 40 CFR 63.688;
- (6) 40 CFR 63.689 (a), (c), and (d);
- (7) 40 CFR 63.690;
- (8) 40 CFR 63.691(a), (b)(1)(i, iii, and iv), and (c);
- (9) 40 CFR 63.693 (a), (b), (c), (d), and (g);
- (10) 40 CFR 63.695 (a)(2), and (a)(3);
- (11) 40 CFR 63.695 (c), (d), and (f);
- (12) 40 CFR 63.696 (a), (b), (e), (g), (h), and (i);
- (13) 40 CFR 63.697 (a), (b)(1 through 5);
- (14) 40 CFR 63.698;

- (15) Table 1 to 40 CFR 63, Subpart DD;
- (16) Table 2 to 40 CFR 63, Subpart DD;
- (17) Table 3 to 40 CFR 63, Subpart DD; and
- (18) Table 4 to 40 CFR 63, Subpart DD.

SECTION E.4

NESHAP - 40 CFR 63, Subpart EEE

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NO_x emissions controlled with a selective non-catalytic reduction (SNCR) system and water injection system, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]
- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a water injection system for NO_x emissions control, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.4.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission units listed above, except as otherwise specified in 40 CFR Part 63, Subpart EEE.
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.4.2 National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors NESHAP [40 CFR Part 63, Subpart EEE] [326 IAC 20-28]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart EEE (included as Attachment D to the operating permit), which are incorporated by reference as 326 IAC 20-28, for the emission units listed above:

- (1) 40 CFR 63.1200;
- (2) 40 CFR 63.1201;
- (3) 40 CFR 63.1204(i)(2);
- (4) 40 CFR 63.1206 (a)(1)(i)(A), (a)(1)(ii)(A), and (a)(3);
- (5) 40 CFR 63.1206 (b)(1), (b)(2), (b)(3), (b)(4), (b)(5), (b)(6), (b)(7), (b)(8), and (b)(11);
- (6) 40 CFR 63.1206 (b)(12), and (b)(13)(i)(A)(1);
- (7) 40 CFR 63.1206 (c)(1), (c)(2), (c)(3), (c)(4), and (c)(5);
- (8) 40 CFR 63.1206 (c)(6)(i), (c)(6)(ii), (c)(6)(iv), (c)(6)(v), (c)(6)(vi), and (c)(6)(vii);
- (9) 40 CFR 63.1206 (c)(7), (c)(8), and (c)(9);
- (10) 40 CFR 63.1207 (a), (b)(1), (b)(2), (c), (d), and (e);
- (11) 40 CFR 63.1207 (f)(1)(i), (f)(1)(ii), (f)(1)(iii), (f)(1)(iv), (f)(1)(v), (f)(1)(vi), and (f)(1)(vii);
- (12) 40 CFR 63.1207 (f)(1)(viii), (f)(1)(ix), (f)(1)(x), (f)(1)(xi), (f)(1)(xii), and (f)(1)(xv);
- (13) 40 CFR 63.1207 (f)(1)(xvi), (f)(1)(xvii), (f)(1)(xix), and (f)(1)(xxvi);
- (14) 40 CFR 63.1207 (f)(1)(xxvii), (f)(2)(i), (f)(2)(ii), (f)(2)(iii), (f)(2)(v), (f)(2)(vi), and (f)(2)(vii);
- (15) 40 CFR 63.1207 (f)(2)(viii), (f)(2)(ix), and (f)(2)(x);
- (16) 40 CFR 63.1207 (g)(1)(i)(A), (g)(1)(i)(C), (g)(1)(ii), (g)(1)(iii), and (g)(2)(i);
- (17) 40 CFR 63.1207 (g)(2)(ii), (g)(2)(iii), and (g)(2)(v);
- (18) 40 CFR 63.1207 (h), (i), (j), (k), (l), and (m);
- (19) 40 CFR 63.1208 (a), (b)(1)(i)(A), (b)(1)(i)(B)(1), (b)(1)(i)(B)(2), and (b)(1)(ii);
- (20) 40 CFR 63.1208 (b)(1)(iii), (b)(2), (b)(3), (b)(4), (b)(5)(i), (b)(5)(ii), (b)(6), and (b)(7);
- (21) 40 CFR 63.1208 (b)(8), and (b)(9);
- (22) 40 CFR 63.1209 (a)(1)(i), (a)(1)(ii), (a)(1)(iii), and (a)(1)(v);
- (23) 40 CFR 63.1209 (a)(2), (a)(3), (a)(4), (a)(5), (a)(6), and (a)(7);
- (24) 40 CFR 63.1209 (b), (c), (d), (e), (f), (h), (i), (j), (k)(1)(i), (k)(2)(ii), (k)(3), and (k)(4);
- (25) 40 CFR 63.1209 (l)(1)(iii), and (l)(1)(v);
- (26) 40 CFR 63.1209 (m)(2), (n)(1), (n)(2)(i), (n)(2)(iii), (n)(2)(vi), (n)(2)(vii), and (n)(3);
- (27) 40 CFR 63.1209 (n)(4), (n)(5), (o)(1)(i), and (o)(2);
- (28) 40 CFR 63.1209 (p), (q), and (r);
- (29) 40 CFR 63.1210;
- (30) 40 CFR 63.1211;
- (31) 40 CFR 63.1212;
- (32) 40 CFR 63.1213;
- (33) 40 CFR 63.1214;
- (34) 40 CFR 63.1220 (a)(1), (a)(2), (a)(3), (a)(4), (a)(5)(ii)(A), (a)(6), and (a)(7);
- (35) 40 CFR 63.1220 (c), (f), (g), and (h);
- (36) Table 1 to Subpart EEE of Part 63; and
- (37) Appendix to Subpart EEE of Part 63.

SECTION E.5

NESHAP - 40 CFR 63, Subpart LLL

Emissions Unit Description:

Raw Material / Clinker Stockpile Operations

- (5) Carhoe Missouri clay unloading, operations commenced in 1962, identified as EU108, with an estimated nominal throughput capacity of 49,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (11) Iron ore unloading, operations commenced in 1967, identified as EU302, with an estimated nominal throughput capacity of 18,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (13) Gypsum unloading, operations commenced in 1962, identified as EU304, with an estimated nominal throughput capacity of 54,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (15) Coal/coke unloading, operations commenced in 1962, identified as EU306, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (17) Coal/coke unloading, operations commenced in 1962, identified as EU313, with an estimated nominal throughput capacity of 212,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (18) West clinker stockpiles, operations commenced in 1962, identified as EU512, with an estimated nominal throughput capacity of 735,800 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (19) Special clinker stockpile, operations commenced in 1962, identified as EU513, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (20) Clinker loading, operations commenced in 1962, identified as EU514, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (21) Special clinker stockpile (crushed), operations commenced in 1962, identified as EU515, with an estimated nominal throughput capacity of 40,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Raw Material Sizing Operations

- (22) Raw material loading, operations commenced in 1962, identified as EU112, with an estimated nominal throughput capacity of 1,846,100 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (23) Raw material unloading, operations commenced in 1962, identified as EU114, with an estimated nominal throughput capacity of 1,660,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (24) One (1) apron feeder transfer to primary crusher, constructed in 1961, identified as EU115, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a water spray. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (26) One (1) clean-up screw, constructed in 1961, identified as EU117, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (27) One (1) impact apron feeder, constructed in 1961, identified as EU118, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 101 (CE101), and exhausting to one (1) stack, identified as EP101. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (28) Belt 1 covered conveyor, constructed in 1962, identified as EU119, with an estimated nominal throughput capacity of 550 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouse 101 (CE101) and baghouse 102 (CE102) (replaced in 2008), and exhausting to two (2) stacks, identified as EP101 and EP102, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (29) Screen transfers, constructed in 1962, identified as EU120, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (30) Belt 2 covered conveyor, constructed in 1962, identified as EU121, with an estimated nominal throughput capacity of 300 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (32) Belt 3 covered conveyor, constructed in 1962, identified as EU201, with an estimated nominal throughput capacity of 550 tons per hour, particulate emissions are controlled with a belt conveyor cover. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Recycled CKD Operations

- (33) #1 recycled dust elevator, constructed in 1965, identified as EU408, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (34) One (1) recycled dust holding tank, constructed in 1965, identified as EU409, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions vent to EU410 (feeder screw and F-K pump) and are controlled by baghouse 106 (CE402). [40 CFR 63, Subpart LLL]
- (35) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU410, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Waste CKD Operations

- (36) Five (5) enclosed discharge hopper screws, transferring kiln dust collected in Baghouse #1 (CE401), constructed in 1965, identified as EU402, each with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (37) One (1) covered 16" cross screw, constructed in 1965, identified as EU403, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are controlled with a screw cover. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (38) One (1) #1 waste dust elevator, constructed in 1965, identified as EU404, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (39) One (1) 9" cross screw, constructed in 1965, identified as EU405, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Recycled CKD Operations

- (40) #2 recycled dust elevator, constructed in 1965, identified as EU417, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (42) One (1) feeder screw and F-K pump, constructed in 1965, identified as EU419, with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 106 (CE402), and exhausting to one (1) stack, identified as EP402. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Waste CKD Operations

- (43) Five (5) enclosed discharge hopper screws, constructed in 1965, identified as EU414, with an estimated combined nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (44) 16" covered cross screws, constructed in 1965, identified as EU415, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (45) #2 waste dust elevator, constructed in 1965, identified as EU416, with an estimated nominal throughput capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Waste CKD Disposal Operations

- (46) Truck loading, operations commenced in 1962, identified as EU407, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

Clay Processing Operations

- (48) Clay unloading to hopper, operations commenced in 1962, identified as EU123, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (49) One (1) wobbler feeder for transferring clay to the log washer system, constructed in 1962, identified as EU124, with an estimated nominal throughput capacity of 30 tons per hour, emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (50) One (1) log washer system, constructed in 1962, identified as EU125, with an estimated nominal throughput capacity of 30 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (52) Loading waste gravel into trucks, operations commenced in 1962, identified as EU127, with an estimated nominal throughput capacity of 8,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

Crane Storage Facilities

- (53) Three (3) limestone storage bins, constructed in 1962, identified as EU202, with an estimated combined nominal throughput capacity of 1,587,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

- (54) One (1) Missouri clay storage bin, constructed in 1962, identified as EU203, with an estimated nominal throughput capacity of 8,000 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (55) One (1) iron ore storage bin, constructed in 1962, identified as EU204, with an estimated nominal throughput capacity of 18,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (56) West fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU210, including tank 9, with a nominal storage capacity of 100 tons, tank 10 with a nominal storage capacity of 100 tons, tank 11 with a nominal storage capacity of 125 tons, and tank 12 with a nominal storage capacity of 125 tons, with an estimated throughput of 15 tons per hour for each tank, with emissions controlled by one (1) baghouse, identified as baghouse 138 (CE202) (replaced in 2008), and exhausting to one (1) stack, identified as EP202. [40 CFR 63, Subpart LLL]
- (57) One (1) inside west fly ash holding tank, constructed in 1962, identified as EU211, with a nominal storage capacity of 130 tons, with emissions controlled by one (1) baghouse, identified as baghouse 104 (CE203), and exhausting to one (1) stack, identified as EP203. [40 CFR 63, Subpart LLL]
- (58) East fly ash truck unloading utilizing pneumatic conveying, operations commenced in 1962, identified as EU213, with an estimated nominal throughput capacity of 21,900 tons per year, with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]
- (59) One (1) east fly ash storage bin, constructed in 1962, identified as EU214, with an estimated nominal throughput capacity of 21,900 tons per year, with emissions controlled by one (1) baghouse, identified as baghouse 103 (CE204), and exhausting to one (1) stack, identified as EP204. [40 CFR 63, Subpart LLL]
- (62) Two (2) gypsum storage bins, constructed in 1962, identified as EU316, with an estimated combined nominal throughput capacity of 54,500 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (63) Clinker bin 1 finish mill #1, constructed in 1962, identified as EU505, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (64) Stone/clinker bin 2 finish mill #1, constructed in 1962, identified as EU506, with an estimated nominal throughput capacity of 390,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (65) Clinker bin 3 finish mill #1, constructed in 1962, identified as EU507, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (66) Crane unloading, operations commenced in 1962, identified as EU510, with an estimated nominal throughput capacity of 407,900 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (67) Clinker bin 1 #2 finish mill, constructed in 1962, identified as EU520, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]

- (68) Clinker bin 2 #2 finish mill, constructed in 1962, identified as EU521, with an estimated nominal throughput capacity of 365,029 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]
- (69) Bin 1 clinker spill pile, constructed in 1962, identified as EU522, with an estimated nominal throughput capacity of 367,900 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]

Raw Mill Facilities

- (70) Three (3) belt feeders, constructed in 1962, identified as EU205, with an estimated nominal throughput capacity of 45 tons per hour, combined, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (71) One (1) Missouri clay belt feeder, constructed in 1962, identified as EU206, with a nominal capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (72) One (1) iron ore feeder, constructed in 1962, identified as EU207, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (73) One (1) covered cross belt, constructed in 1962, identified as EU208, with a nominal capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (74) One (1) covered raw mill feed belt, constructed in 1962, identified as EU209, with a nominal capacity of 175 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (75) Transfer screw to raw mill, constructed in 1962, identified as EU212, with a nominal capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (76) One (1) east short covered screw, constructed in 1962, identified as EU215, with a nominal capacity of 15 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (77) One (1) E-W long covered screw, constructed in 1962, identified as EU216, with a nominal capacity of 15 tons per hour, with particulate matter emissions controlled by one (1) baghouse, identified as baghouse 105 (CE201), and exhausting to one (1) stack, identified as EP201.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Unloading Station Facilities

- (78) Railroad unloading, operations commenced in 1962, identified as EU307, with an estimated nominal throughput of 212,800 tons per year, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL]
- (79) Two (2) unloading station hoppers, constructed in 1962, identified as EU308a and EU308b, each with an estimated nominal throughput of 50 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL]
- (80) One (1) belt feeder, constructed in 1962, identified as EU309, with an estimated nominal throughput capacity of 50 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (81) Belt 7 covered conveyor, constructed in 1962, identified as EU310, with an estimated nominal throughput capacity of 200 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (82) Conveyor transfer to outside storage, constructed in 1962, identified as EU311, with an estimated nominal throughput capacity of 200 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

Fossil Fuel Facilities

- (84) One (1) coal/coke spare belt feeder to belt 8, constructed in 1962, identified as EU317, with an estimated nominal throughput of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (85) One (1) coal/coke belt feeder to belt 8, constructed in 1962, identified as EU318, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (88) Belt feed to coal mill #1, constructed in 1962, identified as EU321, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (89) Coal/Coke cross belt, constructed in 1962, identified as EU322, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #1 Clinker Handling Facilities

- (92) One (1) #1 clinker drag conveyor, constructed in 1962, identified as EU501, with an estimated nominal throughput capacity of 42 tons of clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (93) Two (2) #1 CCDC screw conveyors, constructed in 1962, identified as EU502, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE 404), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (94) #1 clinker elevator, constructed in 1962, identified as EU503, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by one (1) baghouse, identified as baghouse 109 (CE501), and exhausting to one (1) stack, identified as EP501. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (95) Clinker conveyor transfer system, constructed in 1962 and modified in 1975, identified as EU504, with an estimated throughput of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 110 (CE502) and 140 (CE804), and exhausting to two (2) stacks, identified as EP502 and EP804, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]

Kiln #2 Clinker Handling Facilities

- (96) #2 clinker drag conveyor, constructed in 1964, identified as EU516, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouse 112 (CE503) and baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]

- (97) Two (2) #2 CCDC screw conveyors, constructed in 1964, identified as EU517, each with an estimated nominal throughput capacity of 15 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP407. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (98) #2 clinker elevator, constructed in 1964, identified as EU518, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouse 112 (CE503) and as baghouse 113 (CE504), and exhausting to two (2) stacks, identified as EP503 and EP504, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (99) Clinker conveyor transfer system circuit, constructed in 1964, identified as EU519, with an estimated nominal throughput capacity of 42 tons clinker per hour, with emissions controlled by two (2) baghouses, identified as baghouses 113 (CE504) and 141 (CE805), and exhausting to two (2) stacks, identified as EP504 and EP805, respectively.
[40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #1 Facilities

- (100) Clinker bin #1 feeder, constructed in 1962, identified as EU508, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (101) Stone/clinker bin 2 feeder, constructed in 1962, identified as EU509, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (102) One (1) gypsum feed belt, constructed in 1962, identified as EU511, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (103) One (1) finish mill #1 feed belt, constructed in 1962, identified as EU601, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 114 (CE601), and exhausting to one (1) stack, identified as EP601. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (104) One (1) finish mill #1 circuit, constructed in 1962, identified as EU602, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 116 (CE602), and exhausting to one (1) stack, identified as EP602. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (105) One (1) separator, cooler #1 and transfer, constructed in 1962, identified as EU603, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 115 (CE603), and exhausting to one (1) stack, identified as EP603. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Mill #2 Facilities

- (106) Clinker bin 1 feeder, constructed in 1964, identified as EU523, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117a (CE604a), and exhausting to one (1) stack, identified as EP604a.
[40 CFR 63, Subpart LLL - Transfer Point Only]
- (107) Clinker bin 2 feeder, constructed in 1964, identified as EU524, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as BH117b (CE604b), and exhausting to one (1) stack, identified as EP604b.
[40 CFR 63, Subpart LLL - Transfer Point Only]

- (108) FM #2 gypsum feeder, constructed in 1964, identified as EU525, with an estimated nominal throughput capacity of 45 tons per hour, particulate emissions are uncontrolled. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (109) One (1) finish mill #2 feed belt, constructed in 1964, identified as EU604, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 117a (CE604a) and 117b (CE604b), respectively, and exhausting to two (2) stacks, identified as EP604a and EP604b, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (110) One (1) finish mill #2 circuit, constructed in 1964, identified as EU605, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 119 (CE605), and exhausting to one (1) stack, identified as EP605. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (111) One (1) separator, cooler #2 and transfer, constructed in 1964, identified as EU606, with an estimated nominal throughput capacity of 45 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 118 (CE606), and exhausting to one (1) stack, identified as EP606. [40 CFR 63, Subpart LLL - Transfer Point Only]

Finish Product Silo Storage Facilities

- (112) Silos 1/2/3/4/5/6/7, constructed in 1961, identified as EU709, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 122 (CE709), each exhausting to stack EP709, with following storage capacities:
 - (a) Silo 1 and Silo 3, each with 5,806 tons of storage, and an estimated annual throughput of 84,100 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (b) Silo 2 and Silo 4, each with 6,686 tons of storage, and an estimated annual throughput of 86,500 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (c) Silo 5 and Silo 7, each with 6,577 tons of storage, and an estimated annual throughput of 81,300 tons of cement per year, each. [40 CFR 63, Subpart LLL]
 - (d) Silo 6, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
- (113) Silos 8/9/10, constructed in 1961, identified as EU711, each with an estimated maximum throughput of 420 tons per hour, with emissions controlled by baghouse 124 (CE711), each exhausting to stack EP711, with the following storage capacities:
 - (a) Silo 8, with 6,750 tons of storage, and an estimated annual throughput of 83,400 tons of cement per year. [40 CFR 63, Subpart LLL]
 - (b) Silo 9 and Silo 10, each with 5,930 tons of storage, and an estimated annual throughput of 78,700 tons of cement per year, each. [40 CFR 63, Subpart LLL]
- (114) Silos 11/12/13/14/15/16/17/18, identified as EU704, constructed in 1965 and approved in 2012 to be operated two ways. First scenario, silos 11/12/13/14/15/16/17/18 emissions will be controlled by both baghouses, identified as baghouse 126 (CE704), and exhausting to one (1) stack, identified as EP704 and baghouse, identified as baghouse 144 (CE905), and exhausting to one (1) stack, identified as EP905. Second operating scenario, is to isolate the connecting vent for silos 15/18 from the remaining silos, 11/12/13/14/16/17. Silos 15/18 emissions will be controlled by baghouse, identified as baghouse 144 (CE905) and silos 11/12/13/14/16/17 will be controlled by baghouse 126 (CE704). [40 CFR 63, Subpart LLL]

Finish Product Silo Transfer Operations

- (115) Truck/Railroad car unloading and internal transfers to silos, operations commenced in 1962, identified as EU701 and EU702, with an estimated nominal throughput capacity of each unit of 8,000 tons per year, and 100 tons per hour, with emissions from EU701 controlled by one (1) baghouse, identified as baghouse 132 (CE701), and emissions from EU702 controlled by one (1) baghouse, identified as baghouse 133 (CE702), and exhausting to two (2) stacks, identified as EP701 and EP702, respectively. [40 CFR 63, Subpart LLL]

Finish Product Loadout Old Silos (West) Operation

- (116) West bulk truck loadout, constructed in 1962, identified as EU712, with an estimated nominal throughput of 335,300 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 129 (CE712), and exhausting to one (1) stack, identified as EP712. [40 CFR 63, Subpart LLL]
- (117) Bulk railroad loadout, constructed in 1962, identified as EU713, with an estimated nominal throughput of 335,300 tons per year, and 100 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 130 (CE713), and exhausting to one (1) stack, identified as EP713. [40 CFR 63, Subpart LLL]

Finish Product Loadout New Silos (East) Operation

- (118) East bulk truck loadout, constructed in 1965, identified as EU706, with an estimated nominal throughput capacity of 390,200 tons per year, and 450 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 131 (CE706), and exhausting to one (1) stack, identified as EP706. [40 CFR 63, Subpart LLL]

Finish Product Masonry Packing

- (119) Transfer to masonry packer, constructed in 1965, identified as EU801, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, with emissions controlled by two (2) baghouses, identified as baghouses 128 (CE801) and 139 (CE802), and exhausting to two (2) stacks, identified as EP801 and EP802, respectively. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (120) One (1) masonry packer, constructed in 1965, identified as EU802, with an estimated nominal throughput capacity of 118,300 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 128 (CE801), and exhausting to one (1) stack, identified as EP801. [40 CFR 63, Subpart LLL]

Finish Product Portland Packing

- (122) Transfer to portland packer, constructed in 1962, identified as EU804, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL - Transfer Point Only]
- (123) One (1) portland packer, constructed in 1962, identified as EU805, with an estimated nominal throughput capacity of 78,800 tons per year, and 44 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 127 (CE803), and exhausting to one (1) stack, identified as EP803. [40 CFR 63, Subpart LLL]

Clinker Cooler #1 Facilities

- (127) One (1) clinker cooler #1, identified as EU412, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 107 (CE404), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL]

Clinker Cooler #2 Facilities

(128) One (1) clinker cooler #2, identified as EU421, constructed in 1962, with a nominal production rate of 42 tons per hour, with emissions controlled by one (1) baghouse, identified as baghouse 111 (CE407), and exhausting to one (1) stack, identified as EP404. [40 CFR 63, Subpart LLL]

CKD –To-Finish Mill (CKD2FM) Recycling Operations

(130) One (1) CKD2FM recycling storage tank system, approved for construction in 2006, identified as EU902, with an estimated maximum throughput of 63,000 tons of CKD per year, and consisting of a storage tank, rotary airlock feeder, an air blower, and ancillary piping and connectors, emissions are controlled by baghouse 143 (CE 902), exhausting to stack EP902. [40 CFR 63, Subpart LLL]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.5.1 General Provisions Relating to National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 63 [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR 63.1 the Permittee shall comply with the provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference as 326 IAC 20-1, for the emission unit(s) listed above, except as otherwise specified in 40 CFR Part 63, Subpart LLL.

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports 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

E.5.2 National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry NESHAP [40 CFR Part 63, Subpart LLL] [326 IAC 20-27]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart LLL (included as Attachment E to the operating permit), which are incorporated by reference as 326 IAC 20-27, for the emission units listed above:

- (1) 40 CFR 63.1340;
- (2) 40 CFR 63.1341;
- (3) 40 CFR 63.1343;
- (4) 40 CFR 63.1345;
- (5) 40 CFR 63.1346(a), (b), (f), (g)(1, 2, and 4);
- (6) 40 CFR 63.1347;
- (7) 40 CFR 63.1348(a)(1), (a)(2), (a)(3)(i, and ii), (a)(4), (a)(5), and (a)(6);
- (8) 40 CFR 63.1348(b)(1, 2, 3, 4, 6, 7, 8, and 9), (c), and (d);
- (9) 40 CFR 63.1349(a), (b)(1), (b)(2), (b)(3)(i through iv), (b)(4), (b)(5), (b)(6)(ii);
- (10) 40 CFR 63.1349(b)(7)(i, ii, and iv through xiii), (b)(8), (c), (d), and (e);
- (11) 40 CFR 63.1350(a)(1, 3, and 4), (b), (d), (f), (g)(1 through 4), (i), (j), and (k);
- (12) 40 CFR 63.1350(l)(1), (m)(1 through 4), (n)(1, 2, 4 through 10), and (p)(1, 2, 3, and 4);
- (13) 40 CFR 63.1351(a)(1), (c), and (e);
- (14) 40 CFR 63.1352;
- (15) 40 CFR 63.1353;
- (16) 40 CFR 63.1354(a), (b)(1, 2, 3, 6 through 10), and (c);
- (17) 40 CFR 63.1355;
- (18) 40 CFR 63.1356;
- (19) 40 CFR 63.1358; and
- (20) Table 1.

SECTION E.6

NESHAP - 40 CFR 63, Subpart ZZZZ

Insignificant Activities:

- (e) Activities associated with emergencies, including the following:
- (1) One (1) four-stroke diesel-fired emergency engine, engine manufactured on April 27, 1983, identified as Kiln #1 backup, with a rated output of 100 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]
 - (2) One (1) four-stroke diesel-fired emergency engine, engine manufactured on April 27, 1983, identified as Kiln #2 backup, with a rated output of 100 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]
 - (3) One (1) four-stroke diesel-fired emergency generator, engine manufactured prior to 2000, identified as Control Room backup, with a rated output of 587 HP, emissions are uncontrolled. [40 CFR 63, Subpart ZZZZ]

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

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-7-5(1)]

E.6.1 National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR Part 63, Subpart ZZZZ] [326 IAC 20-82]

The Permittee shall comply with the following provisions of 40 CFR Part 63, Subpart ZZZZ (included as Attachment F to the operating permit), which are incorporated by reference as 326 IAC 20-82, for the emission units listed above:

- (a) Kiln #1 and #2 backup
- (1) 40 CFR 63.6580;
 - (2) 40 CFR 63.6585(a) and (b);
 - (3) 40 CFR 63.6590(a)(1)(ii and iv);
 - (4) 40 CFR 63.6595(a)(1), and (c);
 - (5) 40 CFR 63.6602;
 - (6) 40 CFR 63.6605;
 - (7) 40 CFR 63.6625(e)(2), (f), (h), and (i);
 - (8) 40 CFR 63.6640(a), (e), (f)(1), (f)(2)(i), and (f)(3);
 - (9) 40 CFR 63.6645(a)(1);
 - (10) 40 CFR 63.6650(f);
 - (11) 40 CFR 63.6655(e)(2), and (f)(1);
 - (12) 40 CFR 63.6660;
 - (13) 40 CFR 63.6665;
 - (14) 40 CFR 63.6670;
 - (15) 40 CFR 63.6675;
 - (16) Table 2c, Item 1;
 - (17) Table 6, Item 9; and
 - (18) Table 8.
- (b) Control Room backup
- (1) 40 CFR 63.6580;
 - (2) 40 CFR 63.6585(a) and (b);
 - (3) 40 CFR 63.6590(a)(1)(i and iv), and (b)(3)(iii);
 - (4) 40 CFR 63.6595(a)(1), and (c);
 - (5) 40 CFR 63.6600(c);
 - (6) 40 CFR 63.6605;
 - (7) 40 CFR 63.6640(a), (e), (f)(1), (f)(2)(i), and (f)(3);

- (8) 40 CFR 63.6645(a)(5);
- (9) 40 CFR 63.6650(f);
- (10) 40 CFR 63.6665;
- (11) 40 CFR 63.6670;
- (12) 40 CFR 63.6675; and
- (13) Table 8

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

Source Name: Lehigh Cement Company LLC
Source Address: 3084 West CR 225 South, Logansport, Indiana 46947
Part 70 Permit No.: T017-35434-00005

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Lehigh Cement Company LLC
Source Address: 3084 West CR 225 South, Logansport, Indiana 46947
Part 70 Permit No.: T017-35434-00005

This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) 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 2-7-16.

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

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

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

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO 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**

PART 70 QUARTERLY REPORT - CKD Throughput - EU902, EU903, and EU904

Source Name: Lehigh Cement Company LLC
Source Address: 3084 West CR 225 South, Logansport, Indiana 46947
Part 70 Permit No.: T017-35434-00005
Facility: CKD2FM recycling storage tank system (EU902)
CKD2FM #1 FM (EU903) and CKD2FM #2 FM (EU904)
Parameter: Cement Kiln Dust (CKD) throughput
Limit: 65,000 tons per twelve (12) consecutive month period for EU902.
65,000 tons per twelve (12) consecutive month period for EU903 and EU904 combined.

FACILITY: _____ QUARTER: _____ YEAR: _____

Monthly CKD throughput (tons)					
CKD2FM recycling storage tank system (EU902)			CKD2FM #1 FM (EU903) and CKD2FM #2 FM (EU904) (Combined)		
This Month	Previous 11 Months	12 Month Total	This Month	Previous 11 Months	12 Month Total

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Lehigh Cement Company LLC
Source Address: 3084 West CR 225 South, Logansport, Indiana 46947
Part 70 Permit No.: T017-35434-00005

Months: _____ to _____ Year: _____

Page 1 of 2

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".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

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: _____

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

Technical Support Document (TSD) for a
Part 70 Significant Source Modification and Significant Permit Modification

Source Description and Location

Source Name:	Lehigh Cement Company LLC
Source Location:	3084 West CR 225 South, Logansport, Indiana 46947
County:	Cass County, Clinton Township
SIC Code:	3241 (Hydraulic Cement)
Operation Permit No.:	T017-35434-00005
Operation Permit Issuance Date:	November 15, 2016
Significant Source Modification No.:	017-39447-00005
Significant Permit Modification No.:	017-39455-00005
Permit Reviewer:	Mehul Sura

Existing Approvals

The source was issued Part 70 Operating Permit Renewal No. T017-35434-00005 on November 15, 2016. The source has since received the following approvals:

Permit Type	Permit Number	Issuance Date
Administrative Amendment	017-38491-00005	05/16/2017
Administrative Amendment	017-37759-00005	12/30/2016
Significant Source Modification	017-37701-00005	12/30/2016

County Attainment Status

The source is located in Cass County, Clinton Township County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, 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	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) Ozone Standards
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_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. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
Cass 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**
Cass County has been classified as attainment or unclassifiable in Indiana for all the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this source is classified as a portland cement plant, it is considered one (1) of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1), 326 IAC 2-3-2(g), or 326 IAC 2-7-1(22)(B). Therefore, fugitive emissions are counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Greenhouse Gas (GHG) Emissions

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 GHG emissions to determine operating permit applicability or PSD applicability to a source or modification.

Source Status - Existing Source

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

	Source-Wide Emissions Before Modification (ton/year)								
Process / Emission Unit	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	Single HAP	Combined HAPs
Total for Source	806	359	331	1,527	2,582	14.34	395.95	473 (HCl)	487.41
PSD Major Source Thresholds (1 of 28)	100	100	100	100	100	100	100	--	--

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a PSD regulated pollutant, PM, PM₁₀, PM_{2.5}, SO₂, NO_x, and CO, each, is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).
- (b) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

- (c) These emissions are based on the TSD of Part 70 Operating Renewal T017-35434-00005, issued on November 15, 2016.

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed an application, submitted by Lehigh Cement Company LLC on December 22, 2017, relating to incorporate in the permit the provisions of third modification to consent decree No. 2:11-cv-016520-DSC, signed on February 16, 2012.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

There is no emission change due to this proposed modification.

Permit Level Determination – Part 70 Modification to an Existing Source

There is no increase in the potential to emit of any regulated pollutants as the source is not adding any new emission unit or modifying any existing emission unit.

This modification is subject to the source modification requirements under 326 IAC 2-7-10.5. Pursuant to 326 IAC 2-7-10.5(b)(2), federal consent decree that is entered into for the purpose of resolving alleged violations is subject to a Significant Source Modification. Pursuant to 326 IAC 2-7-12(d), this modification is considered a Significant Permit Modification because the permit modification involves significant changes to the existing monitoring requirements of the part 70 Operating Permit.

Permit Level Determination – PSD

Kiln #1 is already equipped with selective non-catalytic reduction (SNCR) system to control NOx emissions from the kiln #1. A water injection system for NOx control is required to be installed on kiln #1 due to this proposed modification. Therefore, the NOx emissions are further reduced from Kiln #1 due to this proposed modification.

Kiln #2 is not equipped with NOx control. The selective non-catalytic reduction (SNCR) system to control NOx emissions from the kiln #2 was approved for construction in 2016 but it was never installed, because third Modification of Consent Decree replaced the requirement for SNCR with water injection as the NOx control for Kiln #2. A water injection system for NOx control will be installed on Kiln #2 to control NOx emissions. Therefore, the NOx emissions will be reduced due to this proposed modification.

This modification to an existing major PSD stationary source is not major because there is no emission increase of any PSD regulated pollutant. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability Determination

Due to the modification at this source, federal rule applicability has been reviewed as follows:

New Source Performance Standards (NSPS):

- (a) There are no NSPS (326 IAC 12 and 40 CFR Part 60) included in the permit for this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP):

- (b) There are no NESHAPs (40 CFR Part 63, 326 IAC 14, and 326 IAC 20) included in the permit for this proposed modification.

Compliance Assurance Monitoring (CAM):

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

The following table is used to identify the applicability of CAM to each existing emission unit and each emission limitation or standard for a specified pollutant based on the criteria specified under 40 CFR 64.2:

Emission Unit/Pollutant	Control Device	Applicable Emission Limitation	Uncontrolled PTE (tons/year)	Controlled PTE (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Kiln #1 - NO _x	SNCR and water injection system	no	100	100	N	NA
Kiln #2 - NO _x	Water injection system	yes	100	100	N ⁽¹⁾	N

- ⁽¹⁾ Pursuant to 40 CFR 64.3(d), if a continuous emission monitoring system (CEMS) is required pursuant to other federal or state authority, the owner or operator shall use the CEMS to satisfy the requirements of CAM according to the criteria contained in 40 CFR 64.3(d). Kiln #2 is equipped with NO_x CEMS. Therefore, CEMS to satisfy the requirements of CAM for Kiln #2.

State Rule Applicability Determination

Due to the modification at this source, state rule applicability has been reviewed as follows:

326 IAC 2-2 (PSD)

PSD applicability is discussed under the Permit Level Determination – PSD section.

326 IAC 2-7-6(5) (Annual Compliance Certification)

The U.S. EPA Federal Register 79 FR 54978 notice does not exempt Title V Permittees from the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D), but the submittal of the Title V annual compliance certification to IDEM satisfies the requirement to submit the Title V annual compliance certifications to EPA. IDEM does not intend to revise any permits since the requirements of 40 CFR 70.6(c)(5)(iv) or 326 IAC 2-7-6(5)(D) still apply, but Permittees can note on their Title V annual compliance certifications that submission to IDEM has satisfied reporting to EPA per Federal Register 79 FR 54978. This only applies to Title V Permittees and Title V compliance certifications.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to assure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in

the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

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

The third Modification of Consent Decree has replaced the requirement for SNCR with water injection as the NOx control for Kiln #2. Therefore, the ammonia continuous emissions monitoring system (CEMS) requirement (Condition D.2.6(g) in the existing permit has been removed.

There are no new or modified compliance requirements included with this modification.

Proposed Changes

The following changes listed below are due to the proposed modification. Deleted language appears as ~~striketrough~~ text and new language appears as **bold** text:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(14)]

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

...

Kiln #1 and Kiln #2 Facilities

(125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NOx emissions controlled with a selective non-catalytic reduction (SNCR) system **and water injection system**, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

(126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a ~~selective non-catalytic reduction (SNCR)~~ **water injection** system for NOx emissions control, ~~approved for construction in 2016,~~ with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

...

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

...

D.1.2 PSD Minor Limits [326 IAC 2-2]

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

- (a) PM and PM₁₀ emissions shall be limited as follows:

...

...

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NO_x emissions controlled with a selective non-catalytic reduction (SNCR) system **and water injection system**, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]
- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a ~~selective non-catalytic reduction (SNCR)~~ **water injection** system for NO_x emissions control, ~~approved for construction in 2016~~, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO₂ emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

...

D.2.3 Nitrogen Oxide (NO_x) Emission Limitation [U.S. EPA Consent Decree]

Pursuant to the Consent Decree in *United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC*, signed on February 16, 2012, and modified on January 4, 2016 and October 5, 2017, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-39447-00005, NO_x emissions from Kiln #2, identified as EU413, shall not exceed 4.75 pounds per ton of clinker produced, based on a 30-day rolling average.

D.2.3D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

...

Compliance Determination Requirements [326 IAC 2-7-5(1)]

D.2.4D.2.5 Sulfur Dioxide (SO₂) Control [U.S. EPA Consent Decree]

...

~~D.2.5~~**D.2.6** Nitrogen Oxide (NOx) Control [U.S. EPA Consent Decree]

- (a) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, ~~and~~ modified on January 4, 2016 **and October 5, 2017**, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number ~~017-37701-00005~~**017-39447-00005**, the Permittee shall install a selective non-catalytic reduction (SNCR) system **and a water injection system** on Kiln #1, and shall continuously operate the SNCR system **and water injection system** at all times when Kiln #1 is in operation. "Continuously operate" means that the SNCR **and water injection** systems shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the SNCR system, **water injection system** and Kiln #1.
- (b) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, ~~and~~ modified on January 4, 2016 **and October 5, 2017**, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number ~~017-37701-00005~~**017-39447-00005**, **and in order to assure compliance with Condition D.2.3**, the Permittee shall install a ~~selective non-catalytic reduction (SNCR)~~**water injection system** system on Kiln #2 ~~prior to March 30, 2017~~, and shall continuously operate the ~~SNCR~~**water injection system** system at all times ~~starting on March 30, 2017~~ when Kiln #2 is in operation. "Continuously operate" means that the ~~SNCR~~**water injection** system shall be operated at all times of kiln operation, consistent with the technological limitations, manufacturers' specifications, and good engineering and maintenance practices for the ~~SNCR~~**water injection** system and Kiln #2.

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

~~D.2.6~~**D.2.7** Continuous Emissions Monitoring [326 IAC 3-5] [326 IAC 2-7-6(1),(6)]
[U.S. EPA Consent Decree]

...

- (f) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, an ammonia continuous emissions monitoring system (CEMS) shall be installed, calibrated, maintained, and operated ~~at least thirty (30) days prior to the start of each optimization period~~ in accordance with 40 CFR 60 and 326 IAC 3-5 for Kiln #1.

- ~~(g) Pursuant to the Consent Decree in United States v. Essroc Cement Corp. No. 2:11-cv-01650-DSC, signed on February 16, 2012, and modified on January 4, 2016, and referenced in the Federal Register as No. 2:11-cv-01650-DSC, and significant source modification number 017-37701-00005, an ammonia continuous emissions monitoring system (CEMS) shall be installed by March 30, 2017 and calibrated, maintained, and operated at least thirty (30) days prior to the start of each optimization period in accordance with 40 CFR 60 and 326 IAC 3-5 by December 31, 2016 for Kiln #2.~~

(g~~h~~) ...

(h~~i~~) ...

~~D.2.7~~**D.2.8** Visible Emissions Notations

...

~~D.2.8~~**D.2.9** Continuous Emissions Monitoring System (CEMS) Downtime [U.S. EPA Consent Decree]

...

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

~~D.2.9D.2.10~~ **D.2.10** Record Keeping Requirements

...

- (b) To document the compliance status with Section C - Opacity, Condition, ~~D.2.7D.2.6~~ Continuous Emissions Monitoring, and Condition ~~D.2.8D.2.7~~ Visible Emissions Notations, the Permittee shall maintain records in accordance with (1) through (3) below. Records shall be complete and sufficient to determine the compliance status with the limits established in Section C - Opacity.
...
- (c) To document the compliance status with Condition ~~D.2.9D.2.8~~(b), the Permittee shall maintain once per shift records, during CEMS downtime, of the CKD injection rate to Kiln #1. The Permittee shall include in its once per shift record when a CKD injection rate reading is not taken and the reason for the lack of a CKD injection rate reading (e.g., the process did not operate that day).
- (d) To document the compliance status with Condition ~~D.2.9D.2.8~~(b), the Permittee shall maintain records of all calculations used to establish the appropriate CKD feed rate during SO2 CEMS downtime intended to assure compliance with the SO2 emission limitation contained in Condition D.2.2(a), based on kiln operating conditions during the SO2 CEMS outage.
- (e) To document the compliance status with Condition ~~D.2.9D.2.8~~(d), the Permittee shall maintain once per shift records, during CEMS downtime, of the CKD injection rate to Kiln #2. The Permittee shall include in its once per shift record when a CKD injection rate reading is not taken and the reason for the lack of a CKD injection rate reading (e.g., the process did not operate that day).
- (f) To document the compliance status with Condition ~~D.2.9D.2.8~~(d), the Permittee shall maintain records of all calculations used to establish the appropriate CKD feed rate during SO2 CEMS downtime intended to assure compliance with the SO2 emission limitation contained in Condition D.2.2(b), based on kiln operating conditions during the SO2 CEMS outage.
- (g) Section C - General Record Keeping Requirements of this permit contains the Permittee's obligations with regard to the records required by this condition.

~~D.2.10D.2.11~~ **D.2.11** Reporting Requirements

- (a) A quarterly report of opacity exceedances and a quarterly summary of the information to document the compliance status with Condition ~~D.2.7D.2.6~~ Continuous Emissions Monitoring shall be submitted not later than thirty (30) days after the end of the quarter being reported.
- (b) Section C - General Reporting contains the Permittee's obligation with regard to the reporting required by this condition.

...

SECTION E.2

NESHAP - 40 CFR 61, Subpart FF

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per

hour (as clinker), with NOx emissions controlled with a selective non-catalytic reduction (SNCR) system **and a water injection system**, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

- (126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a ~~selective non-catalytic reduction (SNCR)~~ **water injection** system for NOx emissions control, ~~approved for construction in 2016~~, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

SECTION E.4

NESHAP - 40 CFR 63, Subpart EEE

Emissions Unit Description:

Kiln #1 and Kiln #2 Facilities

- (125) One (1) wet process rotary cement kiln #1, identified as EU401, constructed in 1962, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with NOx emissions controlled with a selective non-catalytic reduction (SNCR) system **and water injection system**, with PM emissions controlled by one (1) baghouse, identified as Baghouse CE401, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #1 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]
- (2126) One (1) wet process rotary cement kiln #2, identified as EU413, constructed in 1964, with a nominal heat input of 245 million Btu per hour, with a nominal production rate of 42 tons per hour (as clinker), with a ~~selective non-catalytic reduction (SNCR)~~ **water injection** system for NOx emissions control, ~~approved for construction in 2016~~, with PM emissions controlled by one (1) electrostatic precipitator (ESP #2), identified as CE402, approved to be replaced by a baghouse, identified as Baghouse CE405, approved for construction in 2007, and exhausting to one (1) stack, identified as EP401, and SO2 emissions controlled by the Kiln #2 cement kiln dust (CKD) injection system. Raw material sources include clay, sand, limestone, and other sources of silica, alumina, iron, calcium, magnesium, and trace elements. As part of the semi-direct firing system, a pulverizing mill is used to grind the solid fuels that are used in the kiln. The pulverizing mill exhausts to the kiln. [40 CFR 63, Subpart EEE] [40 CFR 61, Subpart FF]

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on December 22, 2017.

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 017-39447-00005. The operation of this proposed modification shall be subject to the conditions of the attached Significant Permit Modification No. 017-39455-00005.

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed SSM and SPM can be directed to Mehul Sura 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) 233-6868 or toll free at 1-800-451-6027 extension 3-6868.
- (b) A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Air Permits page on the Internet at: <http://www.in.gov/idem/airquality/2356.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 20, 2018

Stephen Roosz
Lehigh Cement Company, LLC
3084 West County Road 225 South
Logansport, Indiana 46947

Re: Public Notice
Lehigh Cement Company, LLC
Permit Level: Title V SSM (Minor PSD) and
Title V SPM
Permit Number: 017-39447-00005 and
017-39455-00005

Dear Mr. Roosz:

Enclosed is a copy of your draft Title V Significant Source Modification (Minor PSD) and a copy of your draft Title V Significant Permit Modification, 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 *Pharos Tribune* in Logansport, Indiana publish the abbreviated version of the public notice no later than November 22, 2018. 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 Logansport Cass County Public Library, 616 East Broadway in Logansport, Indiana. 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 Mehul Sura, 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 3-3838 or dial (317) 233-3838.

Sincerely,

John F. Jackson

John F. Jackson
Permits Branch
Office of Air Quality

Enclosures
PN Applicant Cover Letter 1/9/2017



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

ATTENTION: PUBLIC NOTICES, LEGAL ADVERTISING

November 20, 2018

Pharos Tribune
517 East Broadway
P.O. Box 210
Logansport, Indiana 46947

Enclosed, please find one Indiana Department of Environmental Management Notice of Public Comment for Lehigh Cement Company, LLC, Cass 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 November 22, 2018.

Please send the invoice, notarized form, clippings showing the date of publication to Bo Liu, at the Indiana Department of Environmental Management, Accounting, Room N1340, 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 John Jackson at 800-451-6027 and ask for extension 3-1449 or dial 317-233-1449.

Sincerely,

John F. Jackson

John F. Jackson
Permit Branch
Office of Air Quality

Permit Level: Title V Significant Permit Modification and
Title V Significant Source Modification (Minor PSD)
Permit Number: 017-39455-00005 and 017-39447-00005

Enclosure

PN Newspaper Letter 8/22/2018



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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 20, 2018

To: Logansport Cass County Public Library

From: Jenny Acker, Branch Chief
Permits Branch
Office of Air Quality

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

Applicant Name: Lehigh Cement Company, LLC
Permit Number: 017-39447-00005 and 017-39455-00005

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 1/9/2017



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

Notice of Public Comment

November 20, 2018
Lehigh Cement Company, LLC
017-39447-00005 and 017-39455-00005

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 Letter 1/9/2017

Mail Code 61-53

IDEM Staff	JJACKSON 11/20/2018 Lehigh Cement Company LLC 017-39447-00005 & 017-39455-00005 (draft)			AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handling Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Stephen Roosz Lehigh Cement Company LLC 3084 W CR 225 S Logansport IN 469478476 (Source CAATS)										
2		Tracy Crowther Director Lehigh Cement Company LLC 3084 W CR 225 S Logansport IN 469478476 (RO CAATS)										
3		Mr. Harry D. DuVall P.O. Box 147 Idaville IN 47950 (Affected Party)										
4		Cass County Board of Commissioner 200 Court Park Logansport IN 46947 (Local Official)										
5		Cass County Health Department 512 High Street Logansport IN 46947-2766 (Health Department)										
6		Logansport Cass Co Public Library 616 E Broadway Logansport IN 46947-3187 (Library)										
7		Logansport City Council and Mayors Office 601 Broadway Logansport IN 46947 (Local Official)										
8		Mr. James M. Hauck Hatchett & Hauck 111 Monument Circle Suite 301 Indianapolis IN 46204 (Attorney)										
9		Kurt Brandstatter Central Paving, Inc. P.O. Box 357 Logansport IN 46947 (Affected Party)										
10		Christina Seiler The Rochester Sentinel PO Box 260 Rochester IN 46975 (Affected Party)										
11												
12												
13												
14												
15												

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