



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant

DATE: July 19, 2006

RE: Gary Coal Processing, LP -on site contractor of US Steel / 089-7171-00169

FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204.

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

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

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

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

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

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

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

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

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

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



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Gary Coal Processing LP
an on-site Contractor of US Steel - Gary Works
One North Broadway
Gary, Indiana 46402

(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. This permit also addresses certain new source review requirements for existing equipment and is intended to fulfill the new source review procedures pursuant to 326 IAC 2-2 and 326 IAC 2-7-10.5, applicable to those conditions.

| | |
|--|--|
| Operation Permit No.: T089-7171-00169 | |
| Original signed by: Nisha Sizemore, Branch Chief Office of Air Quality | Issuance Date: July 19, 2006 Expiration Date: July 19, 2011 |

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SECTION A SOURCE SUMMARY

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

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

The Permittee owns and operates a stationary raw coal preparation system.

| | |
|------------------------------|--|
| Responsible Official: | Vice President, Gary Coal Processing LP |
| Source Address: | One North Broadway, Gary, Indiana 46402 |
| Mailing Address: | 111 Market Place, Suite 200, Baltimore, MD 21202 |
| General Source Phone Number: | 219-881-1763 |
| SIC Code: | 1221 |
| Source Location Status: | Nonattainment for SO ₂ , Nonattainment for 1-hour ozone Nonattainment for 8-hour ozone Nonattainment for PM 2.5 Attainment for all other criteria pollutants |
| Source Status: | Part 70 Permit Program Major Source, under PSD and Emission Offset Rules; and nonattainment NSR Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories |

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

US Steel - Gary Works is an integrated steel mill that consists of a main mill and an on-site contractor:

- (a) US Steel-Gary Works, 089-00121, the primary operation, is located at One North Broadway, Gary, IN 46402; and
- (b) Gary Coal Processing LP, 089-00169, the on-site contractor, is located at One North Broadway, Gary, IN 46402

Separate Part 70 permits will be issued to US Steel, Gary Works with Permit No.:089-7663-00121 and Gary Coal Processing LP with Permit No.:089-7171-00169 solely for administrative purposes.

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

Gary Coal Processing LP, consists of the following:

Coal Pulverization and Air Preheater System

- (a) One (1) coal pulverization equipment train, identified as SS-1 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and a dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 1A, 1B and 1C.
- (b) One (1) coal pulverization equipment train, identified as SS-2 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input

capacity of 37.3 MMBtu per hour, and a dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 2A, 2B and 2C.

- (c) One (1) coal pulverization equipment train, identified as SS-3 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and a dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 3A, 3B and 3C.

Pulverized Coal Storage and Feed System

- (a) One (1) Pulverized coal Transport, identified as Line A, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse (A) exhausting to stack (SS-5),
- (b) One (1) Pulverized coal Transport, identified as Line B, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse (B) exhausting to stack (SS-6),
- (c) One (1) Pulverized coal storage reservoir, constructed in 1993, with a maximum capacity of 600 tons, blanketed with nitrogen and ducted to a baghouse (vent filter house) exhausting to stack (SS-7),

Railcar Heater

One (1) non-vented railcar heater system, constructed in 1993, with a maximum capacity of 14 MMBtu per hour, exhausting inside the building.

Coal Handling Operations

Coal Handling System

- (a) One (1) Railcar Dumper, identified as RCD-1, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to a baghouse 8AB exhausting through one or two fans to stacks 8A and/or 8B.
- (b) One (1) Reclaim Hopper, identified as RCH-1, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse DC-6 and exhausting to stack DC-6.
- (c) One (1) Reclaim Hopper, identified as FS-15, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse DC-6 exhausting to stack 9,
- (d) One (1) Car Dump Hopper 1/C1, identified as FS-8, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to baghouse DC-1 exhausting to stack F1,
- (e) One (1) Car dump Hopper 2/C1, identified as FS-9, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-2 exhausting to stack F2,
- (f) One (1) Car Dump Hopper 3/C1, identified as FS-10, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-3 exhausting to stack F3,
- (g) One (1) Transfer Point C1/C2, identified as FS-2, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-4 exhausting to stack F4,
- (h) One (1) Reclaim Hopper/C2, identified as FS-14, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to a baghouse DC-5 exhausting to stack F5,

- (i) One (1) Screen Transfer/C2, identified as FS-3, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-7 exhausting to stack F7,
- (j) One (1) Screen/C3 Gate Transfer identified as FS-11, constructed in 1993, ducted to a baghouse DC-8 exhausting to stack F8,
- (k) One (1) Screen/C4 Gate Transfer, identified as FS-12, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-9 exhausting to stack F9,
- (l) One (1) Transfer Point C4/C5, identified as FS-4, constructed in 1993, ducted to a baghouse DC-10 exhausting to stack F10.

East Building – Coal handling

- (a) One (1) Transfer Point C5/C6, identified as FS-5, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-11 exhausting to stack F11,
- (b) One (1) Transfer Point C6/Bin 1, identified as FS-7, constructed in 1993, ducted to baghouse DC-12 exhausting to stack F12,
- (c) One (1) Transfer Point C5/Bin 2, identified as FS-6, constructed in 1993, ducted to baghouse DC-13 exhausting to stack F13,
- (d) One (1) Transfer Point C6/Bin 3, identified as FS-13, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to baghouse DC-14 exhausting to stack F14.

Coal Piles and Haul Roads

- (a) One (1) coal pile and handling operation, identified as F17, constructed in 1993, with a storage capacity of 50,000 tons and an area of 2 acres, having a maximum throughput of 200,000 tons per year.
- (b) Haul Roads - Vehicle Traffic

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

Gary Coal Processing LP, also includes the following specifically regulated insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.[326 IAC 8-3-5][326 IAC 8-3-8]
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. [326 IAC 8-3-2] [326 IAC 8-3-5] p326 IAC 8-3-8]

- (c) One (1) 5, 000 gallon #2 diesel fuel tank - A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]

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, T089-7171-00169, 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:

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

B.4 Enforceability [326 IAC 2-7-7]

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, and 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)] [326 IAC 2-7-6(6)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the A responsible official as defined by 326 IAC 2-7-1(34). 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) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the A responsible official

as defined by 326 IAC 2-7-1(34).

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

- (a) If required by specific condition(s) in Section D. of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue,
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR 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 and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Telephone Number : 1-888-209-8892 (Northwest Regional Office)
(Toll free within Indiana)
Telephone Number : 219-757-0265 (Northwest Regional Office)
Facsimile Number: 219-757-0267

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

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

contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

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

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

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

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

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

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

- (a) All terms and conditions of permits established prior to T089-7171-00169 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 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. 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.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a

requirement of the permit.

B.16 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 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 the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ, determines any of the following: 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 determines any of the following: at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ determines any of the following: may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 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 shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
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 in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- Any such application shall be certified by the A responsible official as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 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 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)(D)(i) 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), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total

emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

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

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

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

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

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

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

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit

shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 and/or 326 IAC 2-3-2.

B.22 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 and the 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 13-14-2-1, IC 13-17-3-2, and IC 13-30-3-1 has 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 13-14-2-1, 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 13-14-2-1, 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 13-14-2-1, 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.23 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
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

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

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Opacity [326 IAC 5-1]

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

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

C.2 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.3 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

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

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

C.5 Fugitive Dust Emissions [326 IAC 6.8-10 and 326 IAC 6.8-11]

- (a) Pursuant to 326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
 - (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
 - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
 - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%) three (3) minute average. This includes material transfer to initial hopper of material processing facility as defined in 326 IAC 6.8-10-2 or material transfer for transportation within or outside the source property including but not limited to the following:
 - (A) Transfer of slag product for use in asphalt plant

- (i) From a storage pile to a front end loader; and
- (ii) From a front end loader to a truck.
- (B) Transfer of sinter blend for use at the sinter plant:
 - (i) From a storage pile to a front end loader; and
 - (ii) From a front end loader to a truck; and
 - (iii) From a truck to the initial processing point
- (C) Transfer of coal for use at a coal processing line:
 - (i) From a storage pile to a front end loader, and
 - (ii) From a front end loader to the initial hopper of a coal processing line.

Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive operations recorded at fifteen (15) second intervals for the duration of the operation.

- (4) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a three (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6.8-10-3(9).
- (5) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (6) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. These limitations may not apply during periods when application of fugitive particulate control measures is either ineffective or unreasonable due to sustained very high wind speeds. During such periods the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of measures and the basis for a claim that meeting opacity limitation was not reasonable given prevailing wind conditions.
- (7) There shall be a zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with in-plant transportation requirement.
- (8) The opacity of fugitive particulate emissions from the in plant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (9) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (10) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (11) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).

- (12) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.
 - (13) PM10 emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity.
 - (14) Fugitive particulate matter from the material processing facilities except at a crusher in which a capture system is not used shall not exceed ten percent (10%) opacity.
 - (15) Fugitive particulate matter from a crusher in which a capture system is not used shall not exceed fifteen percent (15%) opacity.
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan submitted on March 1, 2003 (See Attachment A).
 - (c) The source is subject to 326 IAC 6.8-11 (Lake county Particulate Matter Contingency Measures), because it is subject to the requirements of 326 IAC 6.8-10. Pursuant to this rule, the source shall comply with 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6.

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), 1-7-2, 1-7-3 (c) and (d), 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]

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

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos Inspector is not federally enforceable.

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

C.8 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later

than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, 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 Branch, Office of Air Quality
100 North Senate Avenue,
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 the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

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

C.11 Continuous Compliance Plan (CCP) [326 IAC 6.8-8-1] [326 IAC 6.8-8-8]

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

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

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [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.
- (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.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).
- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [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.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

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

C.17 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 take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

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

C.18 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]

- (a) 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 criteria pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32)) ("Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of fee assessment.
- (b) The statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
- The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement 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.19 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. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the

“projected actual emissions” (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

- (1) Prior to commencing the construction of the “project” (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)(iii) and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) 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
- (3) 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.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue,
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) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ
 - (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1 (xx) and/or 326 IAC 2-3-1 (qq)), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for project at an existing emissions unit shall be submitted within 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 (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management
Air Compliance Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

- (h) 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.21 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 the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The coal pulverization and air preheater system, located in the East Building consists of the following:

- (a) One (1) coal pulverization equipment train, identified as SS-1 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 1A, 1B and 1C.
- (b) One (1) coal pulverization equipment train, identified as SS-2 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 2A, 2B and 2C.
- (c) One (1) coal pulverization equipment train, identified as SS-3 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and dual process separation cyclone, constructed in 1993, and exhausting to one baghouse with three modules (three stacks) 3A, 3B and 3C.

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

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

D.1.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Y.

D.1.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]

Pursuant to 40 CFR 60.252 (a) and (c):

- (a) The Permittee shall not cause to be discharged into the atmosphere from any thermal dryer (preheater) gases which contain particulate matter in excess of 0.031 gr/dscf.
- (b) The Permittee shall not cause to be discharged into the atmosphere from any coal processing equipment gases which exhibit twenty percent (20%) opacity or greater.

D.1.3 PSD Minor Limit (NOx) [326 IAC 2-2]

Pursuant to CP (45) 1895 issued October 26, 1990, the NOx emissions from the pulverized coal preheaters and railcar heater (Section D.3) shall be limited to 37 tons per 12 consecutive month period. Pursuant to CP(45) 1895, the natural gas usage in the three (3) preheaters shall be limited to less than 549 million cubic feet per 12 consecutive month period with compliance demonstrated at the end of each month. The natural gas usage in the three (3) preheaters shall be limited to less than 183 million cubic feet per month. Compliance with this limit restricts the potential to emit for NOx to less than 37 tons per year for the three (3) preheaters and makes the provisions of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), not applicable.

D.1.4 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) The particulate matter (PM) from SS-1 stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C shall each not exceed 0.2 pounds per hour.
- (b) The particulate matter less than 10 microns (PM₁₀) from SS-1 stacks 1A, 1B and 1C; SS-2

stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C shall each not exceed 0.12 pounds per hour.

- (c) Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.
- (d) Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.

D.1.5 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate matter from the coal pulverization equipment trains 1, 2 and 3 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.1.6 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pulverizers, preheaters, dual process separation cyclones and associated baghouses.

Compliance Determination Requirements

D.1.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.1.2, D.1.4, and D.1.5 the Permittee shall perform PM/PM₁₀ stack tests on the three pulverization equipment train SS-1 baghouse stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C, or the three pulverization equipment train SS-3, baghouse stacks 3A, 3B and 3C utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration. The second five year cycle of tests shall be performed on the three pulverization equipment train baghouse SS-1 stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C or the three pulverization equipment train SS-3 baghouse stacks 3A, 3B and 3C not previously tested in accordance with Section C- Performance Testing. The third year cycle of tests shall be performed on the three pulverization equipment train baghouse SS-1 stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C or the three pulverization equipment train SS-3 baghouse stacks 3A, 3B and 3C not previously tested in accordance with Section C- Performance Testing. Then the five year cycle of test begins on the first three pulverization equipment train baghouse stacks tested.

D.1.8 NSPS Coal Preparation Plant [40 CFR 60.245]

Pursuant to 40 CFR 60.254, the Permittee shall demonstrate compliance as follows:

- (a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures, the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.254, except as provided in 40 CFR 60.8(b).
- (b) The Permittee shall determine compliance with the particulate matter standards in condition D.1.2 as follows:
 - (1) For condition D.1.2(a), Method 5 shall be used to determine the particulate matter concentration. The sampling time and sample volume for each run shall be at least 60 minutes and 30 dscf. Sampling shall begin no less than 30 minutes after

start-up and shall terminate before shutdown procedures begin.

- (2) For condition D.1.2(b), method 9 and the procedures in 40 CFR 60.11, shall be used to determine the opacity.

D.1.9 Particulate Matter Control [326 IAC 2-7-6(6)]

- (a) The baghouses for particulate control shall be in operation and control particulate emissions at all times the three (3) pulverization equipment trains are in operation.
- (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.

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

D.1.10 NSPS Coal Preparation Monitoring Requirements [40 CFR 60.254]

Pursuant to 40 CFR 60.253(a), the Permittee of any thermal dryer shall install, calibrate, maintain and continuously operate monitoring devices as follows:

- (1) A monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. The monitoring device is to be certified by the manufacturer to be accurate within +/- 3 degrees F.
- (2) All monitoring devices under 40 CFR 60.254(a) are to be recalibrated annually in accordance with procedures under 40 CFR 60.13(b).

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the pulverization equipment train SS-1 baghouse stacks 1A, 1B and 1C; pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C; and pulverization equipment train SS-3, baghouse stacks 3A, 3B and 3C shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. Failure to take response with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

D.1.12 Parametric Monitoring

The Permittee shall record the pressure drop across the baghouses used in conjunction with each pulverization equipment train, at least once per day when each pulverization equipment train is in

operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation of this permit.

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

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

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of the monthly natural gas usage in the three (3) air preheaters.
 - (b) To document compliance with Conditions D.1.11, the Permittee shall maintain records of once per day visible emission notations of the three (3) pulverization equipment train baghouse stacks exhaust.
 - (c) To document compliance with Condition D.1.12, the Permittee shall maintain records once per day of the pressure drop during normal operation.
 - (d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the stacks tested during each five year test cycle. .
 - (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.
-

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with conditions D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official.

Section D.2 Facility Operation Conditions

Facility Description [326 IAC 2-7-5(15)]: The pulverized coal storage and feed system located in the West Building consists of the following:

- (a) One (1) Pulverized Coal Transport, identified as Line A, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse (A) exhausting to stack (SS-5),
- (b) One (1) Pulverized Coal Transport, identified as Line B, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse (B) exhausting to stack (SS-6),
- (c) One (1) Pulverized Coal storage reservoir, constructed in 1993, with a maximum capacity of 600 tons, blanketed with nitrogen and ducted to a baghouse (vent filter house) exhausting to stack (SS-7),

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

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

D.2.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Y.

D.2.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]

Pursuant to 40 CFR 60.252 (c), the Permittee shall not cause to be discharged into the atmosphere from any coal processing equipment (two (2) coal transport lines and coal storage reservoir) gases which exhibit twenty percent (20%) opacity or greater.

D.2.3 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) The particulate matter (PM) from stacks SS-5, SS-6 and SS-7 shall each not exceed 0.2 pounds per hour.
- (b) The particulate matter less than 10 microns (PM₁₀) from stacks SS-5, SS-6 and SS-7 shall each not exceed 0.12 pounds per hour.
- (c) Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.
- (d) Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.

D.2.4 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate matter from the stacks SS-5, SS-6 and SS-7 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

D.2.5 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pulverized coal transport lines, coal storage reservoir and the associated baghouses.

Compliance Determination Requirements

D.2.6 NSPS Coal Preparation Plant [40 CFR 60.245]

Pursuant to 40 CFR 60.254, the Permittee shall demonstrate compliance as follows:

- (a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures, the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.254, except as provided in 40 CFR 60.8(b).
- (b) The Permittee shall determine compliance with the opacity standards in condition D.2.2, Method 9 and the procedures in 40 CFR 60.11, shall be used to determine opacity.

D.2.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.2.3 and D.2.4 the Permittee shall perform PM/PM₁₀ stack tests on one of the pulverized coal transport stacks SS-5 or SS-6 and the pulverized coal storage reservoir stack SS-7, utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration.

The second five year cycle of tests shall be performed on the pulverized coal transport stacks SS-5 or SS-6 not previously tested and the pulverized coal storage reservoir stack SS-7 in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration.

The next five year test cycle will repeat the first five year cycle of testing.

D.2.8 Particulate Control

The baghouses and vent filter house for the for particulate control shall be in operation and control particulate emissions at all times when the pulverized coal transport lines and coal storage reservoir are in operation.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of the stacks tested during each five year testing cycle. .
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The coal handling thaw shed

One (1) non-vented railcar heater system, constructed in 1993, with a maximum capacity of 14 MMBtu per hour.

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

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

D.3.1 PSD Minor Limit (NOx) [326 IAC 2-2]

Pursuant to CP (45) 1895 issued October 26, 1990, the NOx emissions from the railcar heater and pulverized coal preheaters (Section D.1) shall be limited to 37 tons per 12 consecutive month period. Pursuant to CP(45) 1895, the natural gas usage in the railcar heater shall be limited to less than 12.504 million cubic feet per 12 consecutive month period with compliance demonstrated at the end of each month. The natural gas usage in the railcar heater shall be limited to less than 5 million cubic feet per month. Compliance with this limit restricts the potential to emit for NOx to less than 37 tons per year for the railcar heater and makes the provisions of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), not applicable.

D.3.2 Fugitive Dust Emission Limitations [326 IAC 6-4-2][326 IAC 6.8-10-3]

(a) Pursuant to 326 IAC 6-4-2:

(1) The railcar heater generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

(A) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100(R - U)}{U}$$

Where

P = Percentage increase

R = Number of particles of fugitive dust measured at downward receptor site

U = Number of particles of fugitive dust measured at upwind or background site

(B) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$PR = (1.5 \pm N) P$$

Where

N = Fraction of fugitive dust that is respirable dust;

PR = allowable percentage increase in dust concentration above background; and

P = no value greater than sixty-seven percent (67%).

(C) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute

period.

- (D) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.
- (2) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.
- (b) Pursuant to 326 IAC 6.8-10-3 Lake County Fugitive Particulate Matter Emissions Limitations, fugitive emissions from the railcar heater generating fugitive dust shall comply with the emissions limitations in Section C - Fugitive Dust Emissions.

D.3.3 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the railcar heater and any control devices.

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 compliance with Conditions D.3.1, the Permittee shall maintain records of the monthly natural gas usage in the rail car heaters.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with condition D.3.1, shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: The coal handling processes

- (a) One (1) Railcar Dumper, identified as RCD-1, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to a baghouse 8AB exhausting through one or two fans to stacks 8A and/or 8B.
- (b) One (1) Reclaim Hopper, identified as RCH-1, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse DC-6 and exhausting to stack DC-6.
- (c) One (1) Car Dump Hopper 1/C1, identified as FS-8, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to baghouse DC-1 exhausting to stack F1,
- (d) One (1) Car dump Hopper 2/C1, identified as FS-9, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-2 exhausting to stack F2,
- (e) One (1) Car Dump Hopper 3/C1, identified as FS-10, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-3 exhausting to stack F3,
- (f) One (1) Transfer Point C1/C2, identified as FS-2, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse (DC-4) exhausting to stack (F4),
- (g) One (1) Reclaim Hopper/C2, identified as FS-14, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to a baghouse DC-5 exhausting to stack F5,
- (h) One (1) Screen Transfer/C2, identified as FS-3, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-7 exhausting to stack F7,
- (i) One (1) Screen/C3 Gate Transfer identified as FS-11, constructed in 1993, ducted to a baghouse DC-8 exhausting to stack F8,
- (j) One (1) Screen/C4 Gate Transfer, identified as FS-12, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-9 exhausting to stack F9,
- (k) One (1) Transfer Point C4/C5, identified as FS-4, constructed in 1993, ducted to a baghouse DC-10 exhausting to stack F10,

East Building- Coal Handling

- (a) One (1) Transfer Point C5/C6, identified as FS-5, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-11 exhausting to stack F11,
- (b) One (1) Transfer Point C6/Bin 1, identified as FS-7, constructed in 1993, ducted to baghouse DC-12 exhausting to stack F12,
- (c) One (1) Transfer Point C5/Bin 2, identified as FS-6, constructed in 1993, ducted to baghouse DC-13 exhausting to stack F13,
- (d) One (1) Transfer Point C6/Bin 3, identified as FS-13, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to baghouse DC-14 exhausting to stack F14.

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

Facility Description [326 IAC 2-7-5(15)]: The coal handling operations (continued)

Coal Piles and Haul Roads

- (a) One coal pile operation, identified as F17, constructed in 1993, with a storage capacity of 50,000 tons and an area of 2 acres.
- (b) Haul – Roads – Vehicle Traffic

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

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

D.4.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Y.

D.4.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]

Pursuant to 40 CFR 60.252 (c), the particulate matter opacity from the coal handling processes, shall not exceed twenty percent (20%) opacity.

D.4.3 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) The particulate matter (PM) from stacks 8A, 8B, DC-6, F1 through F5 and F7 through F17 shall each not exceed 0.2 pounds per hour.
- (b) The particulate matter less than 10 microns (PM₁₀) from stacks 8A, 8B, DC-6, F1 through F5 and F7 through F17 shall each not exceed 0.12 pound per hour.
- (c) Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.
- (d) Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.

D.4.4 Particulate Matter Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate matter from the railcar dumpers, hoppers, screens, transfer points and east building transfer points and bins stacks 8A, 8B, DC-6, F1 through F5, F7 through F14 shall not exceed three-hundreds (0.03) grain per dry standard cubic foot (dscf).

D.4.5 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the railcar dumpers, hoppers screens, transfer points and associated baghouses.

Compliance Determination Requirements

D.4.6 NSPS Coal Preparation Plant Testing Requirements [40 CFR 60.254]

Pursuant to 40 CFR 60.254, the Permittee shall demonstrate compliance using the following:

- (a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures, the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.254, except as provided in 40 CFR 60.8(b).
- (b) The Permittee shall determine compliance with the particulate matter standards in condition D.4.2, Method 9 and the procedures in 40 CFR 60.11, shall be used to determine opacity.

D.4.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.4.3 and D.4.4 the Permittee shall perform PM/PM₁₀ stack tests on Railcar Dumper Stacks 8A and 8B and one of each of the following:

Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2 stack F5;
Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper 3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6 stack F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point C6/Bin 3 stack F14

utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration.

The second five year cycle of PM/PM₁₀ tests shall be performed on the Railcar Dumper Stacks 8A and 8B and one of each of the following not tested previously:

Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2 stack F5;
Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper 3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6 stack F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point C6/Bin 3 stack F14

utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration in accordance with Section C – Performance Testing.

The third five year cycle of PM/PM₁₀ tests shall be performed on the Railcar Dumper Stacks 8A and 8B, Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2 stack F5 and one of each of the following not tested previously in test cycle one or two:

Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper 3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6 stack

F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point C6/Bin 3 stack F14

utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM_{10} includes filterable and condensable PM_{10} . These tests shall be repeated at least once every five years from the date of this valid compliance demonstration in accordance with Section C – Performance Testing.

D.4.8 Particulate Control

The baghouses for particulate control shall be in operation and control particulate emissions at all times the railcar dumpers, hoppers screens, and transfer points are in operation.

D.4.9 Fugitive Dust Control

A dust suppressant shall be applied to the coal piles and roads as necessary during the handling and transporting of coal.

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

D.4.10 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the stacks tested during each five year testing cycle.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Specifically Regulated insignificant activities include the following facilities, emission units, fugitive sources, control equipment, process equipment and operational practices:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38°C (100°F) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (c) One (1) 5, 000 gallon #2 diesel fuel tank - A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

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

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

D.5.1 Volatile Organic Compounds (VOC) [326 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.5.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-8] (Material requirements for cold cleaning degreasers)

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

- (a) On and after November 1, 1999, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) On and after May 1, 2001, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase.

- (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) All records required by 326 IAC 8-3-8 (d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

D.5.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

- (a) Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL), that are located in Clark, Floyd, Lake or Porter County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the reporting and record keeping requirements of this rule. The VOL storage vessels are exempted from all other provisions of this rule.
- (b) Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain the following records for the life of the stationary storage vessels and submit a report to IDEM, OAQ containing the following for each vessel:
- (1) The vessel identification number,
 - (2) The vessel dimensions, and
 - (3) The vessel capacity.

OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Gary Coal Processing LP, an on-site Contractor of US Steel-Gary Works
Source Address: One North Broadway, Gary, IN 46402
Mailing Address: 111 Market Place Suite 200, Baltimore, MD 21202
Part 70 Permit No.: T089-7171-00169

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 BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Gary Coal Processing LP, an on-site Contractor of US Steel -Gary Works
Source Address: One North Broadway, Gary, IN 46402
Mailing Address: 111 Market Place Suite 200, Baltimore, MD 21202
Part 70 Permit No.: T089-7171-00169

This form consists of 2 pages

Page 1 of 2

This is an emergency as defined in 326 IAC 2-7-1(12)

The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and

The Permittee must submit notice in writing or by facsimile within two (2) 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 Describe: |
| Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other: |
| Estimated amount of pollutant(s) emitted during emergency: |
| Describe the steps taken to mitigate the problem: |
| Describe the corrective actions/response steps taken: |
| Describe the measures taken to minimize emissions: |
| If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value: |

Submitted by: _____

Title/Position: _____

Date: _____

Phone _____

A certification is not required for this report.

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

Part 70 Quarterly Report

Source Name: Gary Coal Processing LP, an on-site Contractor of US Steel - Gary Works
 Source Address: One North Broadway, Gary, IN 46402
 Mailing Address: 111 Market Place Suite 200, Baltimore, MD 21202
 Part 70 Permit No.: T089-7171-00169
 Facility: Air Preheaters 1,2 and 3 combined
 Parameter: Natural gas usage
 Limit: Natural gas usage of 549 MMcf per 12 consecutive month period with compliance demonstrated at the end of each month and less than 183 MMcf per month.

YEAR: _____

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

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone _____

Attach a signed certification to complete this report.

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

Part 70 Quarterly Report

Source Name: Gary Coal Processing LP, an on-site Contractor of US Steel - Gary Works
 Source Address: One North Broadway, Gary, IN 46402
 Mailing Address: 111 Market Place Suite 200, Baltimore, MD 21202
 Part 70 Permit No.: T089-7171-00169
 Facility: Railcar Heater - Thaw shed
 Parameter: Natural gas usage
 Limit: Natural gas usage of 12.504 MMcft per 12 consecutive month period with compliance demonstrated at the end of each month and less than 5 MMcft per month.

YEAR: _____

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

- No deviation occurred in this quarter.
- Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone _____

Attach a signed certification to complete this report.

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

**PART 70 OPERATING PERMIT
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Gary Coal Processing LP, an on-site Contractor of US Steel - Gary works
 Source Address: One North Broadway, Gary, IN 46402
 Mailing Address: 111 Market Place Suite 200, Baltimore, MD 21202
 Part 70 Permit No.: T089-7171-00169

Months: _____ **to** _____ **Year:** _____

| | |
|---|------------------------|
| <p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, 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 <input type="checkbox"/> No deviations occurred this reporting period.</p> | |
| <p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p> | |
| <p>THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| Date of Deviation | Duration of Deviation: |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |
| <p>Permit Requirement (specify permit condition #)</p> | |
| Date of Deviation: | Duration of Deviation: |
| <p>Number of Deviations:</p> | |
| <p>Probable Cause of Deviation:</p> | |
| <p>Response Steps Taken:</p> | |

| | |
|---|--------------------------|
| 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: | |

Submitted by: _____

Title/Position: _____

Date: _____

Phone _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Gary Coal Processing, LP, an on-site contractor for US Steel-Gary Works
 Source Location: One North Broadway, Gary, IN 46402
 County: Lake
 SIC Code: 1221
 Operation Permit No.: T089-7171-00169
 Permit Reviewer: Gail McGarrity

On February 1, 2005, the Office of Air Quality (OAQ) had a notice published in The Times, Munster, Indiana, stating that Gary Coal Processing, LP had applied for a Part 70 Operating Permit to operate a coal pulverizing and handling operation. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of sixty (60) days to provide comments on whether or not this permit should be issued as proposed.

Written comments were received from Gary PCI Ltd. LP, GP for Gary Coal Processing LP on April 1, 2005. These comments and IDEM, OAQ responses, including changes to the permit (where language deleted is shown with ~~strikeout~~ and the added is shown in **bold**) are as follows:

Comment 1

Condition A.3 and Condition D.1
 Coal Pulverization and Air Preheater System, pages 6, 7 & 31

The three (3) coal pulverization and air preheater systems at the Gary PCI facility [*Gary Coal Processing, LP*] are incorrectly described in the Title V Permit, and as such the emission limits listed in the permit, specifically for particulate matter are difficult to apply to these units. In the Title V Permit the three coal pulverizers and three air preheaters are listed as "exhausting to stacks" SS-1, SS-2 and SS-3. These identification numbers (e.g., SS-1) should be used as designations for the pulverization equipment trains (total of 3) that each consist of: an air preheater, a coal pulverizer, dual process separation cyclones, and one baghouse consisting of three modules (1A, 1B and 1C for SS-1).

Combustion byproducts and heated air are directed from the natural gas fired preheater to the coal pulverizer. The heated air stream then transports the pulverized coal to a coal/air separation device (that uses dual cyclone technology) to direct the pulverized coal into a storage reservoir. Exhaust from the coal/air separators and the pulverized coal reservoir are vented to one of three-module baghouses (each of which contain three stacks). Since there are three equipment trains, there are a total of three baghouses, each with three modules, for a total of nine stack emission points (1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B and 3C).

Response to Comment 1

Condition A.3 and Section D.1 description box are changed as requested. The permit is revised as follows:

- (a) One (1) coal ~~pulverizer~~, **pulverization equipment train**, identified as ~~pulverizer 1~~, **SS-1 that consists of a pulverizer** with a maximum capacity of 90 tons per hour; **a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and a dual process separation cyclone**, constructed in 1993 and ~~two (2) cyclones in parallel, ducted to a~~

- ~~three (3) module A, B and C baghouse exhausting to stack SS-1~~ **one baghouse with three modules (three stacks) 1A, 1B and 1C.**
- (b) One (1) coal pulverizer, **pulverization equipment train**, identified as pulverizer 1, **SS-2 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and a dual process separation cyclone**, constructed in 1993 and ~~two (2) cyclones in parallel, ducted to a three (3) module A, B and C baghouse exhausting to stack SS-1~~ **one baghouse with three modules (three stacks) 2A, 2B and 2C.**
- (c) One (1) coal pulverizer, **pulverization equipment train**, identified as pulverizer 1, **SS-3 that consists of a pulverizer with a maximum capacity of 90 tons per hour; a preheater with a maximum heat input capacity of 37.3 MMBtu per hour, and a dual process separation cyclone**, constructed in 1993 and ~~two (2) cyclones in parallel, ducted to a three (3) module A, B and C baghouse exhausting to stack SS-1~~ **one baghouse with three modules (three stacks) 3A, 3B and 3C.**
- ~~(d) (One (1) air preheater, identified as preheater 1, constructed in 1993, with a maximum capacity of 37.3 MMBtu per hour, ducted to a baghouse 1 exhausting to stack SS-1~~
- (e) One (1) air preheater, identified as preheater 2, constructed in 1993, with a maximum capacity of 37.3 MMBtu per hour, ducted to a baghouse (2) exhausting to stack SS-2;
- (f) One (1) air preheater, identified as preheater 3, constructed in 1993, with a maximum capacity of 37.3 MMBtu per hour, ducted to a baghouse (3) exhausting to stack SS-3,

Comment 2

Condition D.1.2

Page 31

- (a) The limit for particulate matter emissions from the three (3) air preheaters is established as 0.031 gr/dscf. Note that the air preheaters combust natural gas in the absence of any material that would contribute to non-natural gas combustion generated particulate. Any specific particulate matter limit would only be relevant to the module stacks from each baghouse as described above in (comment 1).
- (b) The opacity limit that is proposed for the three (3) coal pulverizers and the three (3) air preheaters is also not pertinent as there are no exhaust points from these process devices. Any opacity limits should be applied to the individual baghouse module vent stacks.

Response to Comment 2

Gary Coal Processing LP was constructed after October 24, 1974, and processes more than 200 tons of coal per day, therefore the New Source Performance (NSPS) for Coal Preparation Plants (40 CFR 60 Subpart Y) particulate matter limits and opacity limits are applicable.

- (a) The NSPS language is being clarified to show the relationship between the particulate emissions generated by each thermal dryer (preheater) which is part of each system SS-1, SS-2 and SS-3 that exhausts into the atmosphere through each associated stack.

Therefore the permit is revised as shown below.

- (b) The NSPS language is being clarified to show the relationship between the opacity generated by each coal processing equipment (pulverizers, air preheaters and dual cyclone separation system) which is part of each system SS-1, SS-2 and SS-3 that exhausts into the atmosphere through each associated stack. Therefore the permit is revised as follows:

D.1.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]

Pursuant to 40 CFR 60.252 (a) and (c):

- (a) ~~The particulate matter emissions from the three (3) air preheaters, shall not exceed 0.031 gr/dscf.~~ **The Permittee shall not cause to be discharged into the atmosphere from any thermal dryer (preheater) gases which contain particulate matter in excess of 0.031 gr/dscf.**
- (b) ~~The particulate matter opacity from the three (3) coal pulverizers and three (3) air preheaters shall not exceed twenty percent (20%) opacity.~~ **The Permittee shall not cause to be discharged into the atmosphere from any coal processing equipment gases which exhibit twenty percent (20%) opacity or greater.**

Comment 3
Condition D.1.5, Page 32

The proposed condition should be deleted as the pulverizers are not an emission source. They are totally enclosed (sealed) process components that do not emit any pollutants.

Response to Comment 3

Pursuant to 326 IAC 1-2-23.5 an emission unit is defined as any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant under the Clean Air Act (CAA). Therefore, the pulverization equipment trains consisting of the pulverizers, preheaters and dual process separation cyclones are emission units that have a potential to emit emissions from processing the coal. Being totally enclosed does not affect the particulate matter limits applied to the pulverization equipment trains that exhaust to a stack as part of the pulverization equipment train. To clarify that the emission limit is applied to the pulverization equipment trains, not just the pulverizers alone, and the permit is revised as shown below.

Since Gary Coal Processing, LP is located in Lake County, has the potential to emit 100 tons or more, or has actual emissions of 10 tons or more of particulate matter per year and is not specifically listed in Sections 326 IAC 6.8-1-2(b), (e), (f) or (g) and 326 IAC 6.8-2 through 326 IAC 6.8-11 of the particulate matter rule, 326 IAC 6.8-1-2(a) applies to the pulverization equipment trains.

D.1.5 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate matter from the coal ~~pulverizers~~ **pulverization equipment trains** 1, 2 and 3 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Comment 4
Condition C.9 (a), Page 23
Condition D.1.7, Page 32

Within the first sentence of D.1.7, please delete the reference to D.1.3 (NOx minor limit) as it is not a PM

test requirement.

Under the testing requirements in Section D.1.7, Gary PCI [*Gary Coal Processing, LP*] will be required to perform PM/PM₁₀ stack tests on one of the three coal pulverization trains. The paragraph also states that "PM₁₀ includes filterable and condensable PM₁₀." However, the particulate limits referenced within D.1.2, D.1.4 and D.1.5 did not consider the condensable fraction of PM when they were established. As a result, Gary PCI [*Gary Coal Processing, LP*] requests the test methods (approved by IDEM, OAQ) used for compliance determination be consistent with the definition of PM used when the limits were established. In general, this would require that Method 5 be used to determine compliance with the limits.

Response to Comment 4

The reference to Condition D.1.3 has been deleted and condition D.1.5 is added. The descriptions of the equipment and stacks have been revised to clarify which stacks are to be tested. Therefore the permit is revised as shown below.

The limits in Condition D.1.4 are revised to accurately reflect the SS-1 stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C, PM and PM₁₀ limits to make 326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements not applicable. The original limitations listed in the Construction Permit (45) 1895, Operating Permit 2360-0134, issued October 26, 1990 and amended on October 30, 1992 and March 18, 1994 stated in grains per actual cubic feet do not differentiate between particulate matter (PM) and particulate matter less than 10 microns (PM₁₀). These PM and PM₁₀ limits do not directly correlate to a pound per hour and ton per year value necessary in order to demonstrate compliance with 326 IAC 2-2 and 326 IAC 2-1.1-5.

The total PM limitation of 25 tons per year and PM₁₀ limitation of 15 tons per year from all stacks SS-1 stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C; SS-5, SS-6 and SS-7; and stacks 8A, 8B, DC-6, and F1 through F5 and F7 through F17 combined makes 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements, not applicable. Therefore, conditions D.1.4 and D.1.7 are revised as shown below.

~~D.1.4 Particulate Matter Emission Offset Minor Limit [326 IAC 2-3]~~

~~Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for emissions points SS 1, SS 2 and SS 3, each shall be limited to no more than 0.001 grains per actual cubic foot of exhaust gas.~~

D.1.4 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) The particulate matter (PM) from SS-1 stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C shall each not exceed 0.2 pounds per hour.**
- (b) The particulate matter less than 10 microns (PM₁₀) from SS-1 stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C shall each not exceed 0.12 pounds per hour.**
- (c) Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.**
- (d) Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.**

Particulate matter (PM) lb/hr limit was calculated using the following equation:

Lake County PSD PM yearly limit = 25 tons per year

25 tons per yr x 2000 lb per ton = 50,000 lbs per yr

50,000 lbs per yr / 8760 hr per yr = 5.71 lb per hour for all 28 stacks at the source

5.71 lb per hour / 28 stacks = 0.2 lb per hour for each stack

Particulate matter less than 10 microns (PM₁₀) lb/hr limit was calculated using the following equation:

Lake County PSD PM₁₀ yearly limit = 15 tons per year

15 tons per yr x 2000 lb per ton = 30,000 lbs per yr

30,000 lbs per yr / 8760 hr per yr = 3.42 lb per hour for all 28 stacks at the source

3.42 lb per hour / 28 stacks = 0.12 lb per hour for each stack

In Condition D.1.8(a) NSPS testing under 40 CFR 60 includes Method 5 for particulate matter, so the permit is not revised as a result of this comment.

D.1.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.1.2 ~~and D.1.3~~ D.1.4, and D.1.5 the Permittee shall perform PM/PM₁₀ stack tests on ~~one of the~~ **three pulverization equipment train SS-1 baghouse stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C, or the three pulverization equipment train SS-3, baghouse stacks 3A, 3B and 3C** utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration. The second five year cycle of tests shall be performed on ~~one of the three~~ ~~the two remaining~~ **three pulverization equipment train baghouse SS-1 stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C or the three pulverization equipment train SS-3 baghouse stacks 3A, 3B and 3C** not previously tested in accordance with Section C- Performance Test. The third year cycle of tests shall be performed on ~~the last,~~ **the three pulverization equipment train baghouse SS-1 stacks 1A, 1B and 1C, the three pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C or the three pulverization equipment train SS-3 baghouse stacks 3A, 3B and 3C** not previously tested in accordance with Section C- Performance Test. **Then the five year cycle of test begins on the first three pulverization equipment train baghouse stacks tested.**

Comment 5 Condition D.1.7, Page 32

The stack testing requirements for the three coal pulverization trains dictate tests on one of the stacks “SS-1, SS-2, or SS-3”, within 36 months after issuance of the Part 70 permit, and at least once every five years from the date of valid compliance demonstration. As provided previously in this document, these equipment identification numbers refer to equipment trains, and not specific stacks. There are three stacks for each baghouse, for a total of nine stacks (1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B & 3C). Gary PCI [Gary Coal Processing, LP] requests that the stack identification numbers be updated, and for the testing to apply to one of the module stacks on one of the baghouses, cycling the testing between baghouses every five years.

Response to Comment 5

In Response to Comment 4, the language has already been revised to address this issue. Gary Coal Processing, LP will send in a stack test protocol for approval by IDEM, OAQ before the stack testing is performed as stated in Section C- Performance Test.

Comment 6

Condition D.1.9, Page 32

Condition D.1.15, D.1.16, Page 34

The three (3) sets of dual cyclones that deposit pulverized coal into the coal reservoir are not control devices, they are process equipment, as shown in the process flow diagram contained in the Title V Permit application. They are required to collect pulverized coal from the pulverizer units and deposit it in the reservoir for transfer to the blast furnace operations. Air from the cyclones is vented through the three module baghouse, which is the particulate matter control device for each equipment train. The cyclones should be removed from the language of the permit regarding the control of particulate emissions, as this not their function. When the three coal pulverizers were authorized through Certificate of Operation numbers 01866, 01867, and 01868, the cyclones were not listed as control devices because particulate control is the primary function of the three baghouses. As process components, neither cyclone inspections (D.1.15) nor cyclone failure detection (D.1.16) should be required.

Response to Comment 6

The cyclones are part of the process equipment, rather than for particulate matter control, as such these cyclones are considered an integral part of the process. Therefore, the conditions D.1.6 and D.1.9 are revised as shown below.

Upon further review, IDEM has determined that it is the Permittee's responsibility to include routine control device inspection requirements in the applicable preventive maintenance plan. Since the Permittee is in the best position to determine the appropriate frequency of control device inspections and the details regarding which components of the control device should be inspected, the conditions requiring control device inspections have been removed from the permit. In addition, the requirement to keep records of the inspections has been removed. Conditions, D.1.13, D.1.15 and D.1.16 are deleted and the conditions renumbered as necessary. Therefore the permit is revised as follows:

D.1.6 Preventive Maintenance Plan

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the pulverizers, preheaters, **dual process separation cyclones** and associated ~~eyclones and~~ baghouses.

D.1.9 Particulate Matter Control

- (a) The ~~eyclones and~~ baghouses for particulate control shall be in operation and control particulate emissions at all times the three (3) **pulverization equipment trains** are in operation.

~~D.1.13 Baghouse Inspections~~

~~An inspection shall be performed each calendar quarter of all bags controlling the three (3) pulverizer and preheater operations when venting to the atmosphere. A baghouse inspection shall be performed within three (3) months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.~~

~~D.1.15 Cyclone Inspections~~

~~An inspection shall be performed each calendar quarter of all cyclones controlling the three (3) pulverizer operations when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

~~D.1.16 Cyclone Failure Detection~~

~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have 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). Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

The record keeping requirement for the baghouse and cyclone inspections is also deleted. A recordkeeping requirement is added to maintain records of which stacks are tested during each stack test cycle. The permit is revised as follows:

~~D.1.17~~ **13** Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records of the monthly natural gas usage in the three (3) air preheaters.
- (b) To document compliance with Conditions D.1.11, the Permittee shall maintain records of once per day visible emission notations of the three (3) pulverization equipment train baghouse stacks exhaust.
- (c) To document compliance with Condition D.1.12, the Permittee shall maintain records once per day of the pressure drop during normal operation.
- ~~(d) To document compliance with Conditions D.1.13 and D.1.15, the Permittee shall maintain records of the results of the inspections required under Conditions D.1.13 and D.1.15.~~
- (d) To document compliance with Condition D.1.7, the Permittee shall maintain records of the stacks tested during each five year test cycle. .
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 7 **Condition D.1.11, Page 33**

- (a) The draft permit requires visible emissions monitoring for the “three (3) pulverizer and air preheater process stacks” once per shift during normal daylight operations. For the reasons stated above (Comment 6), Gary PCI [*Gary Coal Processing, LP*] requests that the wording be modified such that the monitoring requirement applies to the vent stacks from the modules comprising of the three pulverization train baghouses.

Response to Comment 7

The stacks that Visible Emission Notations are to be performed on have been stated as requested in Comment 6. Also, after further review IDEM has determined monitoring Visible Emission Notations once per day is sufficient to satisfy the requirements of the Part 70 rules in 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, the permit is revised as shown below.

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the ~~three (3) pulverizer and air preheater process stacks~~ **pulverization equipment train SS-1 baghouse stacks 1A, 1B and 1C; pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C; and pulverization equipment train SS-3, baghouse stacks 3A, 3B and 3C** shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment 8 Condition D.1.12, Page 33

Gary PCI [Gary Coal Processing, LP] requests that the first sentence of the condition be reworded as follows: "The Permittee shall monitor the total static pressure drop across the baghouses. When each pulverizer is in operation". The words "when venting to the atmosphere" should be stricken.

Response to Comment 8

Upon further review, IDEM has determined that once per day monitoring of the control device is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules in 326 IAC 2-7-5 and 326 IAC 2-7-6. IDEM has revised the Titles of Conditions C –Compliance Response Plan-Preparation, Implementation, Records and Reports and Pressure Gauge and Other Instrument Specifications. To be consistent with descriptions in this condition the equipment name is revised to match the equipment being monitored in D.1.11. Therefore, condition D.1.12 and recordkeeping condition D.1.13(c) are revised as follows:

D.1.12 Parametric Monitoring

The Permittee shall record the ~~total static~~ pressure drop across the baghouses used in conjunction with each ~~pulverizer,~~ **pulverization equipment train** at least once per ~~shift~~ **day** when each ~~pulverizer,~~ **pulverization equipment train** is in operation, ~~when venting to the atmosphere.~~ When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- ~~Compliance Response Plan-Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - ~~Compliance Response Plan-Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances** shall be considered a deviation of this permit.

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

D.1.15 **13**Record Keeping Requirements

- (c) To document compliance with Condition D.1.12, the Permittee shall maintain records of the once per shift day of the total static pressure drop during normal operation when venting to the atmosphere.

Comment 9
Condition D.1.15, page 34

Gary PCI [Gary Coal Processing, LP] requests the condition for inspection be deleted as the referenced cyclones are process components and not air pollution control devices.

Response to Comment 9

This requested change is addressed in Response to Comment 6 above. Condition D.1.15 is renumbered as D.1.14.

Comment 10
Condition D.1.17, page 34

Recordkeeping and Reporting

Modify condition D.1.17(b) to maintain records of the visible emission monitoring notations associated with the vent stacks from the modules comprising the three (3) pulverization train baghouses.

Modify condition D.1.17(c) as follows "...the Permittee shall monitor the total static pressure drop across the baghouses and record any instance when the differential pressure exceeds 8 inches of water".

Response to Comment 10

The designations of the stacks in Condition D.1.17(b) renumbered as D.1.13(b) are revised to match the stacks in condition D.1.11 visible emissions notations for clarification. The permit is revised as follows:

D.1.13 Record Keeping Requirements

- (b) To document compliance with Conditions D.1.11, the Permittee shall maintain records of once per day visible emission notations of the three (3) **pulverization equipment train baghouses** pulverizer stacks exhaust.

The record keeping requirement in condition D.1.17(c) renumbered as D.1.13(c) is to demonstrate compliance with the applicable requirements in this permit. The requirement in Condition D.1.12 is to ensure that the baghouse is operating properly by ensuring the pressure drop is within the optimal range as established by the Permittee or the latest compliant stack test. In order to document compliance with Condition D.1.12, daily records must be maintained of the pressure drop across the baghouse. Recording only the instances when the pressure is above 8.0 inches of water would not meet the record keeping requirements to demonstrate continuous compliance in 326 IAC 2-7-5(3)(B)(i). Therefore the permit is not revised as a result of this comment.

Comment 11
Condition D.1.18, page 35

The requirement to document compliance with Condition D.1.5 (which establishes pulverizer PM limits) should be deleted as the pulverizers are not emission sources.

Response to Comment 11

Condition D.1.18 renumbered as D.1.14 requires a quarterly report to document compliance with the

preheater natural gas usage limit in condition D.1.3. There is no requirement in Condition D.1.18 (renumbered as D.1.14) to document compliance with Condition D.1.5. Therefore the permit is not revised as a result of this comment.

Pursuant to 326 IAC 1-2-23.5 an emission unit is defined as any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant under the Clean Air Act (CAA). Therefore, the pulverizers, preheaters and dual process separation cyclones are emission units that have a potential to emit emissions from processing the coal.

Comment 12
Section D.2
Facility Description(c), page 36

Gary PCI [*Gary Coal Processing, LP*] would like to clarify the language regarding the coal storage reservoir "nitrogen vent with a maximum capacity of 600 tons, ducted to a baghouse." The reservoir is blanketed with nitrogen and has a capacity of 600 tons, but this description is misleading. Gary PCI [*Gary Coal Processing, LP*] requests that the description be modified to read, "Pulverized coal storage reservoir, with a maximum capacity of 600 tons, blanketed with nitrogen and ducted to a baghouse (vent filter house) exhausting to stack (SS-7)."

Response to Comment 12

Condition A.3 and Section D.2 description box are changed as requested. The permit is revised as follows:

Condition A.3

- (c) One (1) Pulverized coal storage reservoir ~~nitrogen vent~~, constructed in 1993, with a maximum capacity of 600 tons, **blanketed with nitrogen and** ducted to a baghouse (vent filter house) exhausting to stack (SS-7),

Section D.2 Description Box

Facility Description [326 IAC 2-7-5(15)]: The pulverized coal storage and feed system located in the West **Building consists of the following:**

- (c)
One (1) Pulverized coal storage reservoir ~~nitrogen vent~~, constructed in 1993, with a maximum capacity of 600 tons, **blanketed with nitrogen and** ducted to a baghouse (vent filter house) exhausting to stack (SS-7),

Comment 13

Condition D.2.2, page 36

Gary PCI [*Gary Coal Processing, LP*] requests that this condition be deleted due to the fact that the coal transport lines are sealed piping components that have no sources of emission. Therefore, there is no opacity associated with these lines.

Response to Comment 13

The standards for particulate matter for coal preparation plant coal processing and conveying equipment, coal storage systems or coal transfer and loading systems, are stated in 40 CFR 60.252(c). This includes

the transport lines and storage reservoir at Gary Coal Processing, LP. This equipment has the potential to emit particulate matter through the associated stacks (SS-5, SS-6 and SS-7). Therefore, the permit is revised as follows:

D.2.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]

Pursuant to 40 CFR 60.252 (c), ~~Particulate matter opacity from the two (2) coal transport lines, shall not exceed twenty percent (20%) opacity.~~, **the Permittee shall not cause to be discharged into the atmosphere from any coal processing equipment (two (2) coal transport lines and coal storage reservoir) gases which exhibit twenty percent (20%) opacity or greater.**

**Comment 14
Condition D.2.6(b), page 36**

Gary PCI [*Gary Coal Processing, LP*] requests that the condition be deleted as it refers to the use of an opacity test to determine compliance with the mass loading limit in condition D.2.4.

Response to Comment 14

The reference in Condition D.2.6(b) is revised to reflect the opacity limit in Condition D.2.2. Therefore, the permit is revised as follows:

D.2.6 NSPS Coal Preparation Plant [40 CFR 60.245]

Pursuant to 40 CFR 60.254, the Permittee shall demonstrate compliance as follows:

- (a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures, the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.254, except as provided in 40 CFR 60.8(b).
- (b) The Permittee shall determine compliance with the ~~particulate matter~~ **opacity** standards in condition ~~D.2.4~~ **D.2.2**, Method 9 and the procedures in 40 CFR 60.11, shall be used to determine opacity.

**Comment 15
Facility Description, Page 38**

Gary PCI [*Gary Coal Processing, LP*] requests that the description of the coal handling thaw shed be changed to the following: One (1) non-vented railcar heater system constructed in 1993, natural gas-fired with a maximum capacity of 14 MMBtu per hour”.

Response to Comment 15

Condition A.3 and Section D.3 description box are changed as follows:

One (1) **non-vented** railcar heater **system**, constructed in 1993, with a maximum capacity of 14 MMBtu per hour ~~exhausting to stack (F15)~~.

**Comment 16
Condition D.3.1 and 3.1, page 38**

Gary PCI [*Gary Coal Processing, LP*] requests that these conditions be deleted as the thaw shed and railcar heater system are not considered to be affected facilities under the NSPS for Coal Preparation Plants (40 CFR 60.250 (a)).

Response to Comment 16

The railcar heater is not a thermal dryer as defined in 40 CFR 60.251(e) which is a facility in which the moisture content of bituminous coal is reduced by contact with a heated gas stream which is exhausted to the atmosphere. The railcar heater heats the railcar and the moisture content of the coal inside the railcar is not reduced. Therefore, the Coal Preparation Plant NSPS requirements in Condition D.3.1 and D.3.2 are deleted and not included in this permit for the railcar heater as shown below. The subsequent conditions are renumbered as necessary.

~~D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]~~

~~The provisions of 40 CFR Part 60, Subpart A—General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 60, Subpart Y.~~

~~D.3.2 NSPS Coal Preparation Plant [326 IAC 12-1][40 CFR 60 Subpart Y]~~

~~Pursuant to 40 CFR 60.252 (c), the particulate matter opacity from the railcar heater exhaust into the atmosphere, shall not exceed twenty percent (20%) opacity.~~

~~D.3.3-1 PSD Minor Limit (NOx) [326 IAC 2-2]~~

~~Pursuant to CP (45) 1895 issued October 26, 1990, the NOx emissions from the railcar heater and pulverized coal preheaters (Section D.1) shall be limited to 37 tons per 12 consecutive month period. Pursuant to CP(45) 1895, the natural gas usage in the railcar heater shall be limited to less than 12.504 million cubic feet per 12 consecutive month period with compliance demonstrated at the end of each month. The natural gas usage in the railcar heater shall be limited to less than 5 million cubic feet per month. Compliance with this limit restricts the potential to emit for NOx to less than 37 tons per year for the railcar heater and makes the provisions of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), not applicable.~~

Comment 17

Condition D.3.4, page 38

Gary PCI [*Gary Coal Processing, LP*] requests that the permit condition be deleted as the railcar heater system combusts only natural gas. Further, there is not a stack associated with the railcar heater system.

Response to Comment 17

Condition D.3.4 renumbered as D.3.2

326 IAC 326 6.8-1-3 (formerly 326 IAC 6-1-3) specifies that the appropriate method for determining compliance with the provisions of 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2) is a Method 5 stack test. Since the railcar heater is a source of fugitive emissions, which do not vent to a stack, IDEM agrees that a reasonable interpretation of the rule is that it was not intended to apply to fugitive emissions. Therefore, IDEM has revised Condition D.3.2 as shown below:

~~D.3.2 Particulate Limitation [326 IAC 6.8-1-2(a)] Fugitive Dust Emission Limitations [326 IAC 6-4-2][326 IAC 6.8-10-3]~~

~~Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations for Lake County), the particulate~~

~~matter from the railcar heater shall not exceed three hundredths (0.03) grain per dry standard cubic foot (dscf).~~

(a) Pursuant to 326 IAC 6-4-2:

1. **(1) The railcar heater generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:**

2. **(A) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:**

3.
$$2. \quad \frac{P = 100 (R) - U}{3. \quad U}$$

4. **Where**

5. **P = Percentage increase**

6. **R = Number of particles of fugitive dust measured at downward receptor site**

7. **U = Number of particles of fugitive dust measured at upwind or background site**

8. **(B) The fugitive dust is comprised of fifty percent (50%) or more respirable dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:**

9.
10.
$$PR = (1.5 \pm N) P$$

11.

12. **Where**

13. **N = Fraction of fugitive dust that is respirable dust;**

14. **PR = allowable percentage increase in dust concentration above background; and**

15. **P = no value greater than sixty-seven percent (67%).**

16.

(C) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.

17.

(D) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section. 326 IAC 6-4-2(4) is not federally enforceable.

18.

(2) Pursuant to 326 IAC 6-4-6(6) (Exceptions), fugitive dust from a source caused by adverse meteorological conditions will be considered an exception to this rule (326 IAC 6-4) and therefore not in violation.

19.

(b) Pursuant to 326 IAC 6.8-10-3 Lake County Fugitive Particulate Matter Emissions Limitations, fugitive emissions from the railcar heater generating fugitive dust shall comply with the emissions limitations in Section C - Fugitive Dust Emissions.

Gary PCI [*Gary Coal Processing, LP*] requests that the condition requiring compliance with Coal Preparation Plant NSPS be deleted as the thaw shed and railcar heater system are not considered to be affected facilities under NSPS for Coal Preparation Plants (40 CFR 60.250 (a)).

Response to Comment 18

Since conditions D.3.1 and D.3.2 are deleted, Condition D.3.6 is also deleted. Therefore, the permit is revised as follows:

~~D.3.6 NSPS Coal Preparation Plants [40 CFR 60.254]~~

~~Pursuant to 40 CFR 60.254, the Permittee shall demonstrate compliance as follows:~~

- ~~(a) In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures, the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.254, except as provided in 40 CFR 60.8(b).~~
- ~~((b) The Permittee shall determine compliance with the particulate matter standards in condition D.3.4, Method 9 and the procedures in 40 CFR 60.11, shall be used to determine opacity.~~

Comment 19

Condition D.3.7 (a), page 39

Gary PCI [*Gary Coal Processing, LP*] requests that the condition be re-worded: "To document compliance with Condition D.3." (which requires tracking natural gas consumption) in lieu of referencing Condition D.3.1 (which references NSPS provisions).

Response to Comment 19

The record keeping requirement references are revised to reflect changes in renumbered Section D.3. The permit is revised as follows:

D.3.7 4 Record Keeping Requirements

- (a) To document compliance with Conditions ~~D.3.3~~, **D.3.1**, the Permittee shall maintain records of the monthly natural gas usage in the rail car heaters.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 20

Condition D.3.8, page 39

Gary PCI [*Gary Coal Processing, LP*] requests that the condition detailing NSPS quarterly reporting requirements be deleted as the thaw shed and heater system are not affected facilities under NSPS for Coal Preparation Plants (40 CFR 60.250 (a)).

Response to Comment 20

The quarterly reporting in Condition D.3.8, now D.3.5, is not a requirement under NSPS for Coal Preparation Plants (40 CFR 60.250 (a)). The original construction permit CP (45) 1895 issued October 26, 1990 contains a requirement to submit a quarterly report of the natural gas usage for the railcar

heater and coal pulverization equipment train preheaters (Section D.1). This report is to demonstrate compliance with the NOx limit, to make PSD 326 IAC 2-2 not applicable. The natural gas usage report form is included at the end of this permit. The condition reference is renumbered condition D.3.1. Therefore, the permit is revised as follows:

D.3.8 5 Reporting Requirements

A quarterly summary of the information to document compliance with condition ~~D.3.3~~, **D.3.1** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the responsible official.

Comment 21

Section D.4, Facility Description (a), (b) and (c) Coal Handling Operations, Pages 7 & 40

The Gary facility operates only one rotary car dumper system which empties the coal into the receiver that has been portioned into three hoppers. A plenum is used to capture particulate generated by the unloading process. The plenum is ducted to a baghouse for removal of particulate.

Gary PCI [Gary Coal Processing, LP] requests the descriptions (a) and (b) be combined into a common description with the following wording: "One railcar dumper identified as RCD-1, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse 8AB exhausting through either one or two fans to stacks 8A and/or 8B.

Gary PCI [Gary Coal Processing, LP] requests the description (c) be reworded to the following: " One (1) reclaim hopper, identified as RCH-1, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse DC-6 and exhausting to stack DC-6.

Response to Comment 21

Condition A.3 and Section D.4 description box are changed as requested. Subsequent descriptions are renumbered as necessary. The permit is revised as follows:

- (a) One (1) Railcar Dumper, identified as ~~FS-4A~~, **RCD-1**, constructed in 1993, with a maximum capacity of ~~550~~ **300** tons per hour, ducted to a baghouse 8AB exhausting **through one or two fans** to stacks ~~(8A)~~ **and/or 8B**.
- ~~(b) One (1) Railcar Dumper, identified as FS-1B, constructed in 1993, with a maximum capacity of 550 tons per hour, ducted to a baghouse 8B exhausting to stack (8B),~~
- ~~(c)~~ **(b)** One (1) Reclaim Hopper, identified as ~~FS-45~~, **RCH-1**, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse DC-6 **and** exhausting to stack ~~(9)~~, **DC-6**.

Comment 22

Condition D.4 Coal Piles and Haul Roads, page 41

The storage capacity of the coal pile operation should read "50,000" tons as it does in Condition A.3, page 8 of the Title V Permit.

Response to Comment 22

The description in Section D.4 now matches the description in Condition A.3. The permit is revised as follows:

- (a) One coal pile operation, identified as F17, constructed in 1993, with a storage capacity of 25,000 50,000 tons and an area of 2 acres.....

Comment 23
Condition D.4.4, page 41

Gary PCI [*Gary Coal Processing, LP*] requests that condition D.4.4 be reworded to delete the references to the railcar dumper, hoppers, screens, transfer points, and east building transfer points as each is a fugitive emission source without a stack. As such a grain loading rate can not be defined or determined.

Response to Comment 23

326 IAC 6.8-10-2(9) (formerly 326 IAC 6-1-11.1(c)(9)) defines "fugitive particulate matter" as any particulate matter emitted into the atmosphere other than through a stack. According to the descriptions in Section 4 description box each emission unit: railcar dumper, hoppers, screens, transfer points, and east building transfer points is ducted to a baghouse, exhausting through a stack. Since, the railcar dumper, hoppers, screens, transfer points, and east building transfer points are not considered sources of fugitive emissions, 326 IAC 6.8-1-2(a) applies. Therefore, the permit is not revised as a result of this comment.

The numbers of the stacks are revised to match the descriptions in the description box as follows:

D.4.4 Particulate Limitations [326 IAC 6.8-1-2(a)]

Pursuant to 326 IAC 6.8-1-2(a)(Particulate Matter Limitations for Lake County), the particulate matter from the railcar dumpers, hoppers, screens, transfer points and east building transfer points and bins stacks 8A, 8B, **DC-6**, F1 through F5, F7 through F14 shall not exceed three-hundreds (0.03) grain per dry standard cubic foot (dscf).

Comment 24
Condition D.4.6 (b), page 41

Gary PCI [*Gary Coal Processing, LP*] requests that this condition be deleted as it refers to the use of an opacity test to determine compliance with the mass loading limit in condition D.4.4.

Response to Comment 24

The opacity testing reference is correct in Condition D.4.6(b). The reference to D.4.2, is the opacity limit for the coal handling processes. Therefore, the permit is not revised as a result of this comment.

Comment 25
Section A.4, Insignificant Activities, page 8

Gary PCI [*Gary Coal Processing, LP*] requests that the list of trivial activities (defined by 326 IAC 2-7-1(40) performed by Gary PCI [*Gary Coal Processing, LP*] be amended to include vacuum systems located at both the east and west buildings and specifically used in housekeeping and janitorial activities as referenced on IDEM form 51596. Part A, Item 8.

Response to Comment 25

The insignificant activities listed in this permit include the specifically regulated insignificant activities listed in the Gary Coal Processing Part 70 Permit Application on Form GSD-10(a). The trivial activities are not required to be included in the Part 70 permit application. Therefore, trivial activities are not listed in the Part 70 Permit, but they may be accessed on the IDEM website at <http://www.in.gov/idem/rules> in 326 IAC 2-7-1(40). Therefore, the permit is not revised as a result of this comment.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes. Miscellaneous grammar and spelling corrections have been made throughout the permit also.

Change 1:

Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP Call published by USEPA in 1997 (62 FR 8314), Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule was effective March 16, 2005; therefore, the following condition will be revised to incorporate the new rule language into this permit.

B.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

~~Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.~~

B.25 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.

Change 2:

| Pollutant | Status |
|-----------|----------------|
| PM2.5 | Non-attainment |

U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.

Therefore the permit is revised as follows:

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

The Permittee owns and operates a stationary scrap steel processing operation.

Responsible Official: President
 Source Address: One North Broadway, Gary, Indiana 46402
 Mailing Address: One North Broadway, Stop 670, Gary, Indiana 46402
 General Source Phone Number: (219)-881-0200
 SIC Code: 1795 and 5093
 Source Location Status: Nonattainment for SO₂,
 Nonattainment for 1-hour ozone
 Nonattainment for 8-hour ozone
Nonattainment for PM 2.5
 Attainment or unclassifiable for all other criteria pollutants
 Source Status: Part 70 Permit Program
 Major source under PSD, Emission Offset Rules; and
 Nonattainment for NSR
 Major source, Section 112 of the Clean Air Act
 1 of 28 Source Categories

Change 3:

Rule 326 IAC 6-1 has been repealed. 326 IAC 6.8 was added to renumber the current rule and divide Lake County source requirements into a separate article with sources divided by sections. The revised rule was published in the Indiana Register September 1, 2005 and became effective September 9, 2005. Therefore the permit conditions and rule references revised by this rule addition are as follows:

| Condition Affected | New 6.8 Rule Reference | Former 6.1 Rule Reference |
|--------------------|---|---|
| C.5 (a) and (b) | 326 IAC 6.8-10, 326 IAC 6.8-10-2, 326 IAC 6.8-10-3, 326 IAC 6.8-11, 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6 | 326 IAC 6-1-11.1 and 326 IAC 6-1-11.2 and 326 IAC 6-1-11.2 parts (h), (i), (k), (l), (m), (o), (p) and (q). |
| C.11 | 326 IAC 6.8-8-1, 326 IAC 6.8-8-5, 326 IAC 6.8-8-7 and 326 IAC 6.8-8-8 | 326 IAC 6-1-10.1(l) and 326 IAC 6-1-10.1(u) |
| D.1.5 | 326 IAC 6.8-1-2(a) | 326 IAC 6-1-2(a) |
| D.2.4 | 326 IAC 6.8-1-2(a) | 326 IAC 6-1-2(a) |
| D.3.2 | 326 IAC 6-4-2 and 326 IAC 6.8-10-3 (Now Fugitive Dust) See Response to Comment 17 | 326 IAC 6-1-11.1 and 326 IAC 6-1-11.2 and 326 IAC 6-1-11.2 |
| D.4.4 | 326 IAC 6.8-1-2(a) | 326 IAC 6-1-2(a) |

Change 4:

An updated fugitive dust control plan was submitted on March 1, 2003 and is attached as Attachment A. Therefore, the permit is revised as follows:

| | |
|-----|--|
| C.5 | Fugitive Dust Emissions Fugitive Dust Emissions [326 IAC 6.8-10-3][326 IAC 6.8-11] |
| (b) | The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan submitted on March 1, 2003 (See Attachment A) . |

Change 5:

The description in A.4 and the Section D.5 consists of the specifically regulated insignificant activities are revised as follows:

- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38° degrees C (100°F) or;

Change 6:

IDEM has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. The IDEM compliance telephone and facsimile numbers are revised in this condition and throughout the permit. In addition, the additional record keeping for PMP inspections is also, removed from the record keeping requirements in conditions. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

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

-
- (a) If required by specific condition(s) in Section D. of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, 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 Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).

- ~~(b) The Permittee shall implement the PMPs, including any record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the responsible official as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR 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 and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;
- Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-~~5674~~ **0178** (ask for Compliance Section)
Facsimile Number: 317-233-~~5967~~ **6865**
- Telephone Number : 1-888-209-8892 (Northwest Regional Office)
(Toll free within Indiana)
Telephone Number : 219-757-0265 (Northwest Regional Office)
Facsimile Number: 219-757-0267
- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the responsible official as defined by 326 IAC 2-7-1(34).

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

D.1.15 13 Record Keeping Requirements

- ~~(e) To document compliance with Condition D.1.6, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

D.2.8 Record Keeping Requirements

- ~~(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

- ~~(b) All records shall be maintained in accordance with Section C – General Record~~

~~Keeping Requirements, of this permit.~~

D.3.4 Record Keeping Requirements

- ~~(b) To document compliance with Condition D.3.3, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

~~D.4.9 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.4.5, the Permittee shall maintain of records of any additional inspections prescribed by the Preventive Maintenance Plan.~~

- ~~(b) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.~~

Change 7:

C.6 Operation of Equipment (a) is the same requirement (to operate the control equipment at all times) that is in conditions D.1.9, D.2.8 and D.4.8. Therefore, It has been decided that it is best to have this requirement under compliance determination in the specific D conditions, and remove C.6 and renumber the conditions in Section C as necessary.

~~C.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.~~

Change 8:

IDEM realizes that these specifications can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

~~C.14 13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

- ~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **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 normal maximum reading for the normal range shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.**
- ~~(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.~~
- ~~(c) (b) The Permittee may request that the IDEM, OAQ approve the use of a pressure gauge or other an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of~~

~~pressure drop or other~~ **the** parameters.

Change 9:

IDEM has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

C.17 16 Compliance Response Plan – Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

~~(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~

~~(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and expected timeframe for taking reasonable response steps.~~

~~(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (c) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.~~

~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~

~~(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or~~

~~(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

~~(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~

- ~~(4) Failure to take reasonable response steps shall constitute a violation of the permit.~~
- ~~(c) The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) An automatic measurement was taken when the process was not operating.~~
- ~~(4) The process has already returned or is returning to operating within normal parameters and no response steps are required.~~
- ~~(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions~~
- ~~(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.**
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:**
- (1) initial inspection and evaluation;**
- (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or**
- (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.**

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:**
 - (1) monitoring results;**
 - (2) review of operation and maintenance procedures and records;**
 - (3) inspection of the control device, associated capture system, and the process.**
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.**
- (e) The Permittee shall maintain the following records:**
 - (1) monitoring data;**
 - (2) monitor performance data, if applicable; and**
 - (3) corrective actions taken.**

Change 10:

Paragraph (a) of the Broken or Failed Baghouse condition has been deleted. For multi-compartment baghouses, the permit will not specify what actions the Permittee needs to take in response to a broken bag. However, a requirement has been added to Condition D.1.9 requiring the Permittee to notify IDEM if a broken bag is detected and the control device will not be repaired for more than ten (10) days. This notification allows IDEM to take any appropriate actions if the emission unit will continue to operate for a long period of time while the control device is not operating in optimum condition. Paragraph (b) is deleted since the baghouses have multiple compartments.

~~D.1.14 Broken or Failed Bag Detection~~

~~In the event that bag failure has been observed:~~

- ~~(a) For multi compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C—Compliance Response Plan—Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 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.~~
- ~~(b) For single compartment baghouses, if failure is indicated by a significant drop in the~~

~~baghouses pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have 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).~~

D.1.9 Particulate Matter Control **[326 IAC 2-7-6(6)]**

- (a) The baghouses for particulate control shall be in operation and control particulate emissions at all times the three (3) pulverization equipment trains are in operation.
- (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.**

Change 12:

Upon further review, IDEM has determined that once per day monitoring of the visible emission notations is generally sufficient to ensure proper operation of the control device. IDEM has also determined that monitoring these parameters once per day is sufficient to satisfy the requirements of the Part 70 rules at 326 IAC 2-7-5 and 326 IAC 2-7-6. Therefore, condition D.1.11 and the recordkeeping in condition D.1.13(b), are revised as follows:

D.1.11 Visible Emissions Notations

- (a) Visible emission notations of the pulverization equipment train SS-1 baghouse stacks 1A, 1B and 1C; pulverization equipment train SS-2 baghouse stacks 2A, 2B and 2C; and pulverization equipment train SS-3, baghouse stacks 3A, 3B and 3C shall be performed once per ~~shift~~ **day** during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an~~ **If abnormal emissions is are observed, the Permittee shall take reasonable response steps in accordance with Section C- Response to Excursions or Exceedances.** Failure to take response with Section C - Compliance Response Plan ~~Preparation, Implementation, Records, and Reports~~ **Response to Excursions or Exceedances**, shall be considered a deviation from this permit.

D.1.15 13 Record Keeping Requirements

- (b) To document compliance with Conditions D.1.11, the Permittee shall maintain records of once per shift ~~day~~ visible emission notations of the three (3) pulverization equipment train baghouses exhaust.

Change 13:

The 326 IAC 8-9-1 rule language was added to clarify the requirements for storage vessels. Condition D.5.3 is revised as follows:

D.5.3 Volatile Organic Liquid Storage Vessels [326 IAC 8-9-1]

- (a) **Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL), that are located in Clark, Floyd, Lake or Porter County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the reporting and record keeping requirements of this rule. The VOL storage vessels are exempted from all other provisions of this rule.**
- (b) Pursuant to 326 IAC 8-9-6 (a) and (b), the Permittee shall maintain the following records for the life of the stationary storage vessels and submit a report to IDEM, OAQ containing the following for each vessel:
- ~~(a)~~ (1) The vessel identification number,
 - ~~(b)~~ (2) The vessel dimensions, and
 - ~~(c)~~ (3) The vessel capacity.

Change 14:

Condition B.13 title has been revised to clarify permit supersession. Therefore, the permit is revised as follows:

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

Change 15:

Upon further review, IDEM has decided to remove (d) concerning nonroad engines from B.18 Permit Amendment or Modification. 40 CFR 89, Appendix A specifically indicates that states are not precluded from regulating the use and operation of nonroad engines, such as regulations on hours of usage, daily mass emission limits, or sulfur limits on fuel; nor are permits regulating such operations precluded, once the engine is no longer new.

B.18 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015-46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]
- ~~(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.~~

Change 16:

The limits in Condition D.2.3 are revised to accurately reflect the stacks SS-5, SS-6 and SS-7, PM and PM₁₀ emission limits to make 326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements not applicable. The original limitations stated in grains per actual cubic feet in the Construction Permit (45) 1895, Operating Permit 2360-0134, issued October 26, 1990 and amended on October 30, 1992 and March 18, 1994 do not differentiate between particulate matter (PM) and particulate matter less than 10 microns (PM₁₀). These PM and PM₁₀ limits do not directly correlate to a pound per hour and ton per year value necessary in order to demonstrate compliance with 326 IAC 2-2 and 326 IAC 2-1.1-5.

The total PM limitation of 25 tons per year and PM₁₀ limitation of 15 tons per year from all stacks SS-1, stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C; SS-5, SS-6 and SS-7; and stacks 8A, 8B, DC-6, and F1 through F5 and F7 through F17 combined makes 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements, not applicable. Therefore, condition D.2.3 and D.2.7 are revised as shown below.

~~D.2.3 Particulate Matter Emission Offset Minor Limit [326 IAC 2-3]~~

~~Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for emissions points SS-5, SS-6 and SS-7 shall be limited to no more than 0.002 grains per actual cubic foot of exhaust gas.~~

D.2.3 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) The particulate matter (PM) from stacks SS-5, SS-6 and SS-7 shall each not exceed 0.2 pounds per hour.**
- (b) The particulate matter less than 10 microns (PM₁₀) from stacks SS-5, SS-6 and SS-7 shall each not exceed 0.12 pounds per hour.**
- (c) Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.**
- (d) Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326**

IAC 2-1.1-5 not applicable.

Particulate matter (PM) lb/hr limit was calculated using the following equation.

Lake County PSD PM yearly limit = 25 tons per year

25 tons per yr x 2000 lb per ton = 50,000 lbs per yr.

50,000 lbs per yr / 8760 hr per yr = 5.71 lb per hour for all 28 stacks

5.71 lb per hour / 28 stacks = 0.2 lb per hour for each stack

Particulate matter less than 10 microns (PM₁₀) lb/hr limit was calculated using the following equation.

Lake County PSD PM₁₀ yearly limit = 15 tons per year

15 tons per yr x 2000 lb per ton = 30,000 lbs per yr.

30,000 lbs per yr / 8760 hr per yr = 3.42 lb per hour for all 28 stacks

3.42 lb per hour / 28 stacks = 0.12 lb per hour for each stack

As a result of this change, testing and recordkeeping requirements have been added to demonstrate compliance with condition D.2.3. The conditions are renumbered as necessary.

D.2.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.2.3 and D.2.4 the Permittee shall perform PM/PM₁₀ stack tests on one of the pulverized coal transport stacks SS-5 or SS-6 and the pulverized coal storage reservoir stack SS-7, utilizing a testing method approved by the commissioner in accordance with Section C – Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be repeated at least once every five years from the date of this valid compliance demonstration. The second five year cycle of tests shall be performed on the pulverized coal transport stacks SS-5 or SS-6 not previously tested and the pulverized coal storage reservoir stack SS-7 accordance with Section C – Performance Testing . The next test cycle will repeat the first cycle of testing.

D.2.7 2.8 Particulate Control

The baghouses and vent filter house for the for particulate control shall be in operation and control particulate emissions at all times when the pulverized coal transport lines and coal storage reservoir are in operation.

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

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of the stacks tested during each five year testing cycle. .**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Change 17:

The limits in Condition D.4.3 are revised to accurately reflect the stacks 8A, 8B, DC-6, and F1 through F5 and F7 through F17 PM and PM₁₀ limits to make 326 IAC 2-2 Prevention of Significant Deterioration (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements not applicable. The original limitations stated in grains per actual cubic feet in the construction permit (45) 1895, Operating Permit 2360-0134, issued October 26,

1990 and amended on October 30, 1992 and March 18, 1994 do not differentiate between particulate matter (PM) and particulate matter less than 10 microns (PM₁₀). These PM and PM₁₀ limits do not directly correlate to a pound per hour and ton per year value necessary in order to demonstrate compliance with 326 IAC 2-2 and 326 IAC 2-1.1-5.

The total PM limitation of 25 tons per year and PM₁₀ limitation of 15 tons per year from all stacks SS-1, stacks 1A, 1B and 1C; SS-2 stacks 2A, 2B and 2C; and SS-3 stacks 3A, 3B and 3C; SS-5, SS-6 and SS-7; and stacks 8A, 8B, DC-6, and F1 through F5 and F7 through F17 combined makes 326 IAC 2-2 (PSD) and 326 IAC 2-1.1-5 Air Quality Requirements, not applicable. Therefore, condition D.4.3 and D.4.7 are revised as shown below.

~~D.4.3 Particulate Matter Emission Offset Minor Limit [326 IAC 2-3]~~

~~Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for each emission point RCD-1, FS-2 through FS-14 and RCH-1 shall not exceed 0.005 grains per actual cubic foot of exhaust gas.~~

D.4.3 PM and PM₁₀ Minor Limits [326 IAC 2-2][326 IAC 2-1.1-5]

- (a) **The particulate matter (PM) from stacks 8A, 8B, DC-6, F1 through F5 and F7 through F17 shall each not exceed 0.2 pounds per hour.**
- (b) **The particulate matter less than 10 microns (PM₁₀) from stacks 8A, 8B, DC-6, F1 through F5 and F7 through F17 shall each not exceed 0.12 pound per hour.**
- (c) **Compliance with the limitations in conditions D.1.4(a), D.2.3(a) and D.4.3(a) combined limits PM to less than 25 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.**
- (d) **Compliance with the limitations in conditions D.1.4(b), D.2.3(b) and D.4.3(b) combined limits PM₁₀ to less than 15 tons per year and makes 326 IAC 2-2 and 326 IAC 2-1.1-5 not applicable.**

Particulate matter (PM) lb/hr limit was calculated using the following equation.

Lake County PSD PM yearly limit = 25 tons per year

25 tons per yr x 2000 lb per ton = 50,000 lbs per yr.

50,000 lbs per yr / 8760 hr per yr = 5.71 lb per hour for all 28 stacks

5.71 lb per hour / 28 stacks = 0.2 lb per hour for each stack

Particulate matter less than 10 microns (PM₁₀) lb/hr limit was calculated using the following equation.

Lake County PSD PM₁₀ yearly limit = 15 tons per year

15 tons per yr x 2000 lb per ton = 30,000 lbs per yr.

30,000 lbs per yr / 8760 hr per yr = 3.42 lb per hour for all 28 stacks

3.42 lb per hour / 28 stacks = 0.12 lb per hour for each stack

As a result of this change, testing and recordkeeping requirements have been added to demonstrate compliance with condition D.4.3. The conditions are renumbered as necessary.

D.4.7 Testing Requirements

Within 36 months after issuance of this Part 70 permit and in order to comply with conditions D.4.3 and D.4.4 the Permittee shall perform PM/PM₁₀ stack tests on Railcar

Dumper Stacks 8A and 8B and one of each of the following:

**Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2 stack F5;
Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper
3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6
stack F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen
Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point
C6/Bin 3 stack F14**

**utilizing a testing method approved by the commissioner in accordance with Section C –
Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be
repeated at least once every five years from the date of this valid compliance
demonstration.**

**The second five year cycle of PM/PM10 tests shall be performed on the Railcar Dumper
Stacks 8A and 8B and one of each of the following not tested previously:**

**Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2 stack F5;
Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper
3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6
stack F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen
Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point
C6/Bin 3 stack F14**

**utilizing a testing method approved by the commissioner in accordance with Section C –
Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be
repeated at least once every five years from the date of this valid compliance
demonstration in accordance with Section C – Performance Testing.**

**The third five year cycle of PM/PM10 tests shall be performed on the Railcar Dumper
Stacks 8A and 8B, Reclaim Hopper RCH-1 baghouse Stack DC-6 or Reclaim Hopper/C2
stack F5 and one of each of the following not tested previously in test cycle one or two:**

**Car Dump Hopper 1/C1 stack F1, Car Dump Hopper 2/C2 stack F2 or Car Dump Hopper
3/C3 stack F3;
Transfer Point C1/C2 Stack F4, Transfer Point C4/C5 stack F10 or Transfer Point C5/C6
stack F11;
Screen Transfer/C2 stack F7, Screen Transfer/C3 gate Transfer stack F8 or Screen
Transfer/C4 Gate Transfer stack F9; and
Transfer Point C6/Bin 1, stack F12, Transfer Point C5/Bin 2, stack F13 or Transfer Point
C6/Bin 3 stack F14**

**utilizing a testing method approved by the commissioner in accordance with Section C –
Performance Testing. PM₁₀ includes filterable and condensable PM₁₀. These tests shall be
repeated at least once every five years from the date of this valid compliance
demonstration in accordance with Section C – Performance Testing.**

D.4.74.8 Particulate Control

The baghouses for particulate control shall be in operation and control particulate emissions at all times the railcar dumpers, hoppers screens, and transfer points are in operation.

D.4.8 4.9 Fugitive Dust Control

A dust suppressant shall be applied to the coal piles and roads as necessary during the handling and transporting of coal.

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

D.4.910 Record Keeping Requirements

- (a) To document compliance with Condition D.4.7, the Permittee shall maintain records of the stacks tested during each five year testing cycle. .
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Change 18:

The following changes have been made to the permit to clarify that Condition A.2 is not federally enforceable.

Section A

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

In addition it has been determined that the paragraph that discusses common control does not need to be included in Condition A.2.

~~IDEM has determined that US Steel, Gary Works and Gary Coal Processing LP are under the common control of US Steel, Gary Works. These two plants are considered one source due to contractual control. Therefore, the term source in the Part 70 documents refers to both US Steel, Gary Works and Gary Coal Processing LP as one source.~~

Change 19:

After further review, the following is changed for consistency.

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

US Steel - Gary Works is an integrated steel mill that consists of a main mill and an on-site contractor:

- (a) US Steel-Gary Works, 089-00175, the primary operation, is located at, One North Broadway, Gary, IN 46402; and

- (b) Gary Coal Processing LP , 089-00169, the ~~supporting operation~~ **on-site contractor**, is located at One North Broadway, Gary, IN 46402

Separate Part 70 permits will be issued to US Steel, Gary Works **with Permit No.:** (089-7663-00121) and Gary Coal Processing LP **with Permit No.:** (089-7171-00169) solely for administrative purposes.

Change 20:

IDEM has clarified the Section B Operational Flexibility condition as follows:

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), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the ~~emissions allowable~~ **under 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
Permits Branch, Office of Air Quality
100 North Senate Avenue, ~~P. O. Box 6015~~
Indianapolis, Indiana ~~46206-6015~~ **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, ~~on a rolling five (5) year basis~~, all such changes and emissions ~~trading trades~~ that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **The Permittee shall make** such records available, upon reasonable request, for public review.

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

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is

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

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

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

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade **emissions** increases and decreases ~~in emissions in~~ 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.**

Change 21:

IDEM has clarified the Section B Annual Compliance Certification condition as follows:

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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted ~~in letter form~~ no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
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 the certification by the A responsible official as defined by 326 IAC 2-7-1(34).

Change 22:

IDEM has clarified the Section C General Record Keeping Requirements condition as follows:

C.19 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. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility that a "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee) and/or 326 IAC 2-3-1 (z) may result in significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:

- (1) Prior to commencing the construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1(mm)(2)(A)~~(3)~~ **(iii)** and
 - (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) 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
- (3) 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.

Change 23:

IDEM has added language to the Condition Titles to match the Table of Contents listings as follows:

D.4.4 Particulate **Matter** Limitations [326 IAC 6.8-1-2(a)]

D.4.6 NSPS Coal Preparation Plants **Testing Requirements** [40 CFR 60.254]

D.4.9 **10**Record Keeping Requirements

Change 24:

IDEM has clarified the Section B - Permit Shield Requirements condition as follows:

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 in 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.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: Gary Coal Processing, LP, an on-site contractor for US Steel-Gary Works
Source Location: One North Broadway, Gary, IN 46402
County: Lake County
SIC Code: 1221
Operation Permit No.: T089-7171-00169
Permit Reviewer: Gail McGarrity

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Gary Coal Processing LP relating to the operation of a coal pulverizing and handling operation.

Source Definition

US Steel - Gary Works is an integrated steel mill consists of a main mill and an on-site contractor:

- (a) US Steel, Gary Works, the primary operation, located at, One North Broadway, Gary, IN 46402; and
- (b) Gary Coal Processing LP , the supporting operation, located at One North Broadway, Gary, IN 46402

IDEM has determined that US Steel, Gary Works and Gary Coal Processing LP are under the common control of US Steel, Gary Works. These two plants are considered one source due to contractual control. Therefore, the term source in the Part 70 documents refers to both US Steel, Gary Works and Gary Coal Processing LP as one source.

Separate Part 70 permits will be issued to US Steel, Gary Works (089-7663-00121) and Gary Coal Processing LP (089-7171-00169) solely for administrative purposes.

Permitted Emission Units and Pollution Control Equipment

Gary Coal Processing LP consists of the following:

Coal Pulverization and Air Preheater System (East Building)

- (a) One (1) coal pulverizer, identified as pulverizer 1, constructed in 1993, with a maximum capacity of 90 tons per hour, and two (2) cyclones in parallel, ducted to a three (3) module A, B and C baghouse, exhausting to stack SS-1;
- (b) One (1) coal pulverizer, identified as pulverizer 2, constructed in 1993, with a maximum capacity of 90 tons per hour, and two (2) cyclones in parallel, ducted to a three (3) module A, B and C baghouse, exhausting to stack SS-2,
- (c) One (1) coal pulverizer, identified as pulverizer 3, constructed in 1993, with a maximum capacity of 90 tons per hour, and two (2) cyclones in parallel, ducted to a three (3) module A, B and C baghouse, exhausting to stack SS-3,
- (d) One (1) air preheater , identified as preheater 1, constructed in 1993, with a maximum

- capacity of 37.3 MMBtu per hour, ducted to a baghouse 1 exhausting to stack SS-1,
- (e) One (1) air preheater , identified as preheater 2, constructed in 1993, with a maximum capacity of 37.3 MMBtu per hour, ducted to a baghouse 2 exhausting to stack SS-2,
 - (f) One (1) air preheater, identified as preheater 3, constructed in 1993, with a maximum capacity of 37.3 MMBtu per hour, ducted to a baghouse (3) exhausting to stack SS-3.

Pulverized Coal Storage and Feed System (West Building)

- (a) One (1) Pulverized coal Transport, identified as Line A, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse A exhausting to stack SS-5,
- (b) One (1) Pulverized coal Transport, identified as Line B, constructed in 1993, with a maximum capacity of 210 tons per hour, ducted to a baghouse B exhausting to stack SS-6,
- (c) One (1) Pulverized coal storage reservoir nitrogen vent, constructed in 1993, with a maximum capacity of 600 tons, ducted to a baghouse (vent filter house) exhausting to stack SS-7,

Railcar Heater

One (1) railcar heater, constructed in 1993, with a maximum capacity of 14 MMBtu per hour, exhausting to stack F15.

Coal Handling Operations

Coal Handling System

- (a) One (1) Railcar Dumper, identified as FS-1A, constructed in 1993, with a maximum capacity of 550 tons per hour, ducted to a baghouse 8A exhausting to stack 8A,
- (b) One (1) Railcar Dumper, identified as FS-1B, constructed in 1993, with a maximum capacity of 550 tons per hour, ducted to a baghouse 8B exhausting to stack 8B,
- (c) One (1) Reclaim Hopper, identified as FS-15, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to baghouse (DC-6) exhausting to stack (9),
- (d) One (1) Car Dump Hopper 1/C1, identified as FS-8, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to baghouse DC-1 exhausting to stack F1,
- (e) One (1) Car dump Hopper 2/C1, identified as FS-9, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-2 exhausting to stack F2,
- (f) One (1) Car Dump Hopper 3/C1, identified as FS-10, constructed in 1993, with a maximum capacity of 200 tons per hour, ducted to a baghouse DC-3, exhausting to stack F3,
- (g) One (1) Transfer Point C1/C2, identified as FS-2, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-4 exhausting to stack F4,
- (h) One (1) Reclaim Hopper/C2, identified as FS-14, constructed in 1993, with a maximum capacity of 300 tons per hour, ducted to a baghouse DC-5 exhausting to stack F5,
- (i) One (1) Screen Transfer/C2, identified as FS-3, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-7, exhausting to stack F7,

- (j) One (1) Screen/C3 Gate Transfer identified as FS-11, constructed in 1993, ducted to a baghouse DC-8, exhausting to stack F8,
- (k) One (1) Screen/C4 Gate Transfer, identified as FS-12, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-9, exhausting to stack F9,
- (l) One (1) Transfer Point C4/C5, identified as FS-4, constructed in 1993, ducted to a baghouse DC-10, exhausting to stack F10,

East Building Coal Handling

- (a) One (1) Transfer Point C5/C6, identified as FS-5, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to a baghouse DC-11 exhausting to stack F11,
- (b) One (1) Transfer Point C6/Bin 1, identified as FS-7, constructed in 1993, ducted to baghouse DC-12 exhausting to stack F12,
- (c) One (1) Transfer Point C5/Bin 2, identified as FS-6, constructed in 1993, ducted to baghouse DC-13 exhausting to stack F13,
- (d) One (1) Transfer Point C6/Bin 3, identified as FS-13, constructed in 1993, with a maximum capacity of 600 tons per hour, ducted to baghouse DC-14 exhausting to stack F14.

Coal Piles and Haul Roads

- (a) One (1) coal pile and handling operation, identified as F17, constructed in 1993, with a storage capacity of 50,000 tons and an area of 2 acres, having a maximum throughput of 200,000 tons per year.
- (b) Haul Roads - Vehicle Traffic

Insignificant Activities

Gary Coal Processing LP, also includes the following Specifically regulated insignificant activities:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6. [326 IAC 8-3-8][326 IAC 8-3-8]
- (b) Cleaners and solvents characterized as follows:
 - (1) Having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100EF) or;
 - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months. [326 IAC 8-3-8] [326 IAC 8-3-8]
- (c) One (1) 5, 000 gallon 2 diesel fuel tank - A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. [326 IAC 8-9-1]

Existing Approvals

Gary Coal Processing LP has been Operating under approvals from Indiana Department of Environmental Management and the City of Gary Environmental Affairs Department including but not limited to the following:

- (a) State Construction Permit (45) 1895, issued October 26, 1990, amended on October 30, 1992 and March 18, 1994.
- (b) City of Gary Certificates of Operation Permit Nos. 02162, through 02187, issued October 21, 1997.

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

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

CP (45) 1895 issued October 26, 1990, amended on October 30, 1992 and March 18, 1994.

- (a) Condition 6 - That visible emissions from the operations associated with the raw coal storage pile shall be limited to 30% opacity over a six-minute average and 60% opacity for a cumulative total of 15 minutes in a six hour period, pursuant to 326 IAC 5-1.

Reason not incorporated: The opacity limit was incorrectly stated as 30% over a six minute average. The opacity limit should have been 20% over a six minute average as required in 326 IAC 5-1, since the source is located in Lake County.

- (b) Condition 9 - That particulate matter emissions from the train car heating unit shall comply with 326IAC 6-2 (Particulate Emissions Limitations for Sources of Indirect Heating). Particulate matter emissions from the train car heating unit shall be limited to 0.55 pounds per million BTU heat input, pursuant to that rule.

Reason not incorporated: The railcar heater is not considered a source of indirect heating and , 326 IAC 6-2 does not apply to this operation. Since the railcar heater is located in a particulate matter nonattainment area, and the potential to emit particulate for the entire source is greater then 100 tons per year and actual particulate matter emissions are greater than 10 tons per year, 326 IAC 6-1-2(a) applies to the railcar heater.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information used in this review was derived from the application and information submitted July 21, 2003.

An administratively complete Part 70 permit application for the purposes of this review was received on November 14, 1996.

A notice of completeness letter was mailed to the source on November 5, 1997.

Potential to Emit - US Steel - Gary Works (089-00121) and Coal Processing LP (089-00169)

Pursuant to 326 IAC 2-7-1(29), Potential to Emit is defined as the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant | Potential To Emit (tons/year) |
|-----------------|-------------------------------|
| PM | greater than 100 |
| PM-10 | greater than 100 |
| SO ₂ | greater than 100 |
| VOC | greater than 25 |
| CO | greater than 100 |
| NO _x | greater than 100 |

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29) of PM₁₀, SO₂, NO_x and CO are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions - Gary Coal Processing LP (089-00169)

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

| Pollutant | Actual Emissions (tons/year) |
|-----------------|------------------------------|
| PM | 13.77 |
| PM-10 | 5.87 |
| SO ₂ | 0.07 |
| VOC | 0.64 |
| CO | 9.8 |
| NO _x | 11.67 |
| HAP (specify) | 0.0 |

County Attainment Status

The source is located in Lake County.

| Pollutant | Status |
|--------------|-----------------------|
| PM-10 | attainment |
| SO2 | Non-attainment |
| NO2 | Attainment |
| 1-hour Ozone | Severe non-attainment |
| 8-hour Ozone | basic non-attainment |
| CO | Attainment |
| Lead | attainment |

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone 2-3.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NOx threshold for non-attainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as non-attainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offsets, 326 IAC 2-3. See the State Applicability for the source section.
- (2) VOC and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as non-attainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for non-attainment new source review.
- (b) Lake County has been classified as nonattainment for SO2. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (c) Lake County has been classified as attainment for PM10 , NOx, CO and lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The New Source Performance Standard, 326 IAC 12 (40 CFR 60.250 through 60.254 Subpart Y) is included in this permit for the Gary Coal Processing, LP coal preparation operation.
 - (1) The particulate matter emissions from the preheaters shall not exceed 0.031 gr/dscf.
 - (2) The particulate matter opacity from the three (3) preheaters, three (3) pulverizers, two (2) coal transport lines, railcar heater and transfer equipment shall not exceed twenty percent (20%) opacity.
- (b) There are no other New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit for Gary Coal Processing, LP.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPS) (326 IAC 20 and 40 CFR Part 63) included in this permit for Gary Coal Processing, LP.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

Since this source is required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, this source is subject to 326 IAC 2-6 (Emission Reporting). The US Steel-Gary Works and Gary Coal Processing, LP also have potential to emit greater than or equal to 2500 tons per year of nitrogen oxides and 250 tons of volatile organic compounds per year; therefore, an emission statement covering the previous calendar year must be submitted by July 1 annually. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

326 IAC 5-1 (Opacity Limitations)

The source is subject to 326 IAC 5-1-2 (Opacity Limitations), because it is located in Lake County and it shall meet the following:

- (a) Opacity shall not exceed an average of twenty percent (20%) 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.

326 IAC 6-1-10.1(l) 326 IAC 6-1-10.1(u) Continuous Compliance Plan (CCP)

Pursuant to 326 IAC 6-1-10.1(l), the Permittee shall submit to IDEM, OAQ and maintain at the source a copy of the Continuous Compliance Plan (CCP). Pursuant to 326 IAC 6-1-10.1 (l) through (v), the Permittee shall perform inspections, monitoring and record keeping requirements as specified or in accordance to Permittee's CCP.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements),

The source is subject to the limits in 326 IAC 6-1-11.1 , because particulate matter emissions from

source wide activities are above five (5) tons per year.

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

- (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%). Where adequate wetting of the material for fugitive particulate emissions control is prohibitive to further processing or reuse of the material, the opacity shall not exceed ten percent (10%) three (3) minute average. This includes material transfer to initial hopper of material processing facility as defined in 326 IAC 6-1-11.1(c) or material transfer for transportation within or outside the source property including but not limited to the following:
 - (A) Transfer of slag product for use in asphalt plant
 - (i) From a storage pile to a front end loader; and
 - (ii) From a front end loader to a truck.
 - (B) Transfer of sinter blend for use at the sinter plant:
 - (i) From a storage pile to a front end loader; and
 - (ii) From a front end loader to a truck; and
 - (iii) From a truck to the initial processing point
 - (C) Transfer of coal for use at a coal processing line:
 - (i) From a storage pile to a front end loader, and
 - (ii) From a front end loader to the initial hopper of a coal processing line.

Compliance with any operation lasting less than three (3) minutes shall be determined as an average of consecutive operations recorded at fifteen (15) second intervals for the duration of the operation.

- (4) Slag and kish handling activities at integrated iron and steel plants shall comply with the following particulate emissions limits:
 - (A) The opacity of fugitive particulate emissions from transfer from pots and trucks into pits shall not exceed twenty percent (20%) on a three (6) minute average.
 - (B) The opacity of fugitive particulate emissions from transfer from pits into front end loaders and from transfer from front end loaders into trucks shall comply with the fugitive particulate emission limits in 326 IAC 6-1-11.1(d)(9).
- (5) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (6) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average. These limitations may not apply during periods when application of fugitive particulate control measures is either ineffective or unreasonable due to sustained very high wind speeds. During such periods the company must continue to implement all reasonable fugitive particulate control measures and maintain records documenting the application of

measures and the basis for a claim that meeting opacity limitation was not reasonable given prevailing wind conditions.

- (7) There shall be a zero (0) percent frequency of visible emission observations of a material during the in plant transportation of material by truck or rail at any time. Material transported by truck or rail that is enclosed and covered shall be considered in compliance with in-plant transportation requirement.
 - (8) The opacity of fugitive particulate emissions from the in plant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
 - (9) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (10) The PM₁₀ emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (11) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
 - (12) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.
 - (13) PM₁₀ emissions from each material processing stack shall not exceed 0.022 grains per dry standard cubic foot and ten percent (10%) opacity.
 - (14) Fugitive particulate matter from the material processing facilities except at a crusher in which a capture system is not used shall not exceed ten percent (10%) opacity.
 - (15) Fugitive particulate matter from a crusher in which a capture system is not used shall not exceed fifteen percent (15%) opacity.
- (b) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan submitted on December 13, 1996.
- (c) The source is subject to 326 IAC 6-1-11.2 (Lake county Particulate Matter Contingency Measures), because it is subject to the requirements of 326 IAC 6-1-11.1. Pursuant to this rule, the source shall comply with parts (h), (i), (k), (l), (m), (o), (p) and (q).

326 IAC 6-3 Particulate Matter Limitations for Manufacturing Operations

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

326 IAC 6-4 Fugitive Dust Emissions

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

326 IAC 7-1.1 Sulfur Dioxide (SO₂) Emission Limitations

Since coal pulverizing and handling does not have the potential to emit twenty five (25) tons per year or more of SO₂, this rule is not applicable.

State Rule Applicability - Individual Facilities

Coal Pulverization and Preheater System

326 IAC 2-3 Particulate Matter Emission Offset Minor Limit

Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for each coal pulverizer and preheater stack SS-1, SS-2 and SS-3, shall not exceed 0.001 grains per actual cubic foot of exhaust gas. Compliance with this limit makes the provisions of 326 IAC 2-3 Emission Offsets, not applicable.

326 IAC 6-1-2(a) Particulate Matter Emissions Limitation

Pursuant to 326 IAC 6-1-2(a), the particulate matter from each Coal pulverizers 1, 2 and 3 and Preheaters 1, 2 and 3 ,stacks SS-1, SS-2 and SS-3, shall not exceed 0.03 grains per dry standard cubic foot (dscf).

326 IAC 2-2 Nitrogen Oxides NO_x (PSD) Minor Limit

Pursuant to CP (45) 1895 issued October 26, 1990, the NO_x emissions from the pulverized coal preheaters and railcar heater (Section D.3) shall be limited to 37 tons per 12 consecutive month period. Pursuant to CP(45) 1895, the natural gas usage in the three (3) preheaters shall be limited to less than 549 million cubic feet per 12 consecutive month period with compliance demonstrated at the end of each month. The natural gas usage in the three (3) preheaters shall be limited to less than 183 million cubic feet per month. Compliance with this limit restricts the potential to emit for NO_x to less than 37 tons per year for the three (3) preheaters and makes the provisions of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), not applicable.

Pulverized Coal Storage and Feed System

326 IAC 2-3 Particulate Matter Emission Offset Minor Limit

Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for pulverized coal transport line A and B and pulverized coal storage reservoir stacks SS-5, SS-6 and SS-7 shall not exceed 0.002 grains per actual cubic foot of exhaust gas.

326 IAC 6-1-2 (a) Particulate Limitations

Pursuant to 326 IAC 6-1-2 (a)(Non-attainment Area Particulate Limitations: General Sources), the particulate matter from the pulverized coal transport line A and B and pulverized coal storage reservoir stacks SS-5, SS-6 and SS-7 shall not exceed three-hundreds (0.03) grain per dry standard cubic foot (dscf).

Railcar Heater

326 IAC 2-2 Nitrogen Oxides (NO_x) PSD Minor Limit

Pursuant to CP (45) 1895 issued October 26, 1990, the NO_x emissions from the railcar heater and the pulverized coal preheaters (Section D.1) shall be limited to 37 tons per 12 consecutive month

period. Pursuant to CP(45) 1895, the natural gas usage in the railcar heater shall be limited to less than 12.504 million cubic feet per 12 consecutive month period with compliance demonstrated at the end of each month. The natural gas usage in the railcar heater shall be limited to less than 5 million cubic feet per month. Compliance with this limit restricts the potential to emit for NOx to less than 37 tons per year for the railcar heater and makes the provisions of 326 IAC 2-2 Prevention of Significant Deterioration (PSD), not applicable.

326 IAC 6-1-2 (a) Particulate Limitation

Pursuant to CP (45) 1895 issued October 26, 1990 and 326 IAC 6-1-2 (a)(Nonattainment Area Particulate Limitations: General Sources), the particulate matter from the railcar heater stack F15 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Coal Handling

326 IAC 2-3 Particulate Matter Emission Offset Minor Limit

Pursuant to CP (45) 1895, issued on October 26, 1990, and amended on March 18, 1994, the outlet grain loading for rail car dumpers, hoppers, screens, transfer points and east building transfer points and bins stacks 8A, 8B, 9, F1 through F5, F7 through F14 shall not exceed 0.005 grains per actual cubic foot of exhaust gas.

326 IAC 6-1-2 (a) Particulate Limitations

Pursuant to 326 IAC 6-1-2 (a)(Non-attainment Area Particulate Limitations: General Sources), the particulate matter from the rail car dumpers, hoppers, screens, transfer points and east building transfer points and bins stacks 8A, 8B, 9, F1 through F5, F7 through F14 shall not exceed three-hundredths (0.03) grain per dry standard cubic foot (dscf).

Insignificant Activities - Specifically Regulated

326 8-3-5 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Clark, Elkhart, Floyd, Lake, Marion, Porter or St. Joseph Counties, the Permittee shall ensure that the following requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)),

then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^oC) (one hundred twenty degrees Fahrenheit (120^oF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-3-8 Volatile Organic Compounds (VOC) (Material requirements for cold cleaning degreasers)

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

- (a) On and after November 1, 1999, no person shall operate a cold cleaning degreaser with a solvent vapor pressure that exceeds two (2) millimeters of mercury (thirty-eight thousandths (0.038) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) On and after May 1, 2001, no person shall Operate a cold cleaning degreaser with a solvent vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (c) On and after November 1, 1999, all persons subject to the requirements of 326 IAC 8-3-8 (c)(1)(B) and (c)(2)(B) shall maintain each of the following records for each purchase:

- (1) The name and address of the solvent supplier.
 - (2) The date of purchase.
 - (3) The type of solvent.
 - (4) The volume of each unit of solvent.
 - (5) The total volume of the solvent.
 - (6) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (d) All records required by 326 IAC 8-3-8 (d) shall be retained on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

326 IAC 8-9-1 Volatile Organic Liquid Storage Vessels

Pursuant to 326 IAC 8-9-1 (a) and (b) (Volatile Organic Liquid Storage Vessels), on and after October 1, 1995, stationary vessels used to store volatile organic liquids (VOL), that are located in, Lake County with a capacity of less than thirty nine thousand (39,000) gallons are subject to the reporting and record keeping requirements of this rule. The VOL storage vessels Diesel Tank is exempt from all other provisions of this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less 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 requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

The compliance monitoring requirements applicable to the three (3) coal pulverizers are as follows:

- (a) Visible emissions notations of the coal pulverizer stacks SS-1 through SS-3, exhaust shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously a normal means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. 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. 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. The Compliance Response Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation of this permit.

- (b) The Permittee shall record the total static pressure drop across the baghouses 1, 2 and 3 used in conjunction with the pulverizers at least once per shift when the pulverizers are in operation, when for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 to 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

These monitoring conditions are necessary, because the baghouses for the coal pulverizers and preheaters must operate properly to ensure compliance with 326 IAC 6-1-2(a) (PM limitation for general sources in non-attainment areas) and 326 IAC 2-7 (Part 70).

Conclusion

The operation of this coal handling and pulverizing operation shall be subject to the conditions of the attached proposed Part 70 Permit No. T089-7171-00169.

Fugitive Dust Plan

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1.0 INTRODUCTION

On May 12, 1993, The Indiana Department of Environmental Management (IDEM) promulgated rule 326 IAC 6-1-11.1, Lake County Fugitive Particulate Matter Control Requirements, placing it into effect 30 days later. This rule requires that affected sources submit a fugitive particulate control plan to reduce emissions of PM-10 (particulate matter with an aerodynamic diameter of 10 microns or less) from nontraditional sources of fugitive emissions. This plan must include a description of each nontraditional source, measurements of the parameters needed to estimate emissions from these sources, control measures and other work practices to be employed to limit PM-10 emissions from these sources, and conditions (i.e. rain, snow, high wind speeds, freezing conditions, etc.) that may prevent or delay routine implementation of some control measures.

In response to these regulations, Gary Works conducted field programs to quantify emissions of PM-10 generated by vehicular traffic on plant roadways, material handling and transfer activities, wind erosion of storage piles and open areas, and vehicular traffic entering and exiting parking lots. In order to quantify these emissions, samples of the particulate in parking lots and roadways were collected. Storage piles and open areas were also sampled. The opacity of PM-10 emissions from these nontraditional sources were also observed and recorded using the procedures set forth in 326 IAC 6-1-11.1. Gary Works recently updated the original survey. Roadways, storage piles, material transfer and handling activities, parking lots and exposed areas under the control of private contractors were not included in this study. The results of this survey and the quantification of nontraditional sources of fugitive emissions are presented in [Figure 1](#). The background data used to estimate these emissions can be found in [Appendix A](#).

The following sections contain the plan developed to control nontraditional fugitive particulate emissions at USS Gary Works. This plan updates the original plan submitted in 1993 and will be executed under the supervision of the USS Environmental Control Division, Gary Works, One North Broadway, Mail Station 70, Gary, Indiana 46402. Telephone number (219) 888-2339. This plan will be implemented on a year round basis except, when not required to do so under Section 5.0 – Conditions Preventing Use of Control Measures.

Areas of USS Gary Works which are under the control of independent contractors and companies will have separate particulate control plans and are not covered within the context of this particulate control plan. These contractors fall under 326 IAC 6-1-11.1 paragraph (a) (4).
[top↑](#)

2.0 DESCRIPTION OF FACILITIES

USS Gary Works is a fully integrated steelmaking facility located on the southern shore of Lake Michigan in Gary, Indiana. The plant occupies an area approximately seven miles long and more than a mile wide. Landfill areas occupy the extreme eastern end of the plant property. The

Coke Plant and Sinter Plant are also located east of the Slip with the remainder of the Plant west of the slip. Roadways, storage piles, and most of the material handling operations that are the responsibility of Gary Works are identified in this plan. The blast furnace dustcatcher, coke screening, coal handling, raw material handling at the sinter plant, ore unloading, alloy control and other operations are described in paragraphs 3.3.1 through 3.3.11. [top↑](#)

3.0 IDENTIFICATION OF FACILITIES

3.1 Paved Roadways and Parking Lots

Drawings [GW468068](#) and [GW468069](#) show the locations of the existing paved roads and parking lots at USS Gary Works. Paved roadways and parking lots that require control measures specified by this plan are identified on these drawings.

3.2 Unpaved Roadways and Open Areas

Drawings [GW468070](#) and [GW468071](#) show the locations of existing unpaved roads and open areas at USS Gary Works. Unpaved roads and open areas that require control measures specified by this plan are identified on these drawings.

3.3 Storage Piles

The approximate locations of the various storage piles are identified on Gary Works drawings [GW487814](#) and [GW487815](#). Because of the transient nature of these storage piles, the exact pile locations may change but the general storage pile areas will remain the same. Load-in, load-out and screening operations are also transient and take place throughout the area.

3.4 Other Material Handling Facilities

The majority of material handling activities that have the potential to generate fugitive particulate are performed by outside contractors. Plant contractor locations and associated activities are identified on Gary Works drawings [GW487814](#) and [GW487815](#). Control of these emissions is the responsibility of the individual contractor and these activities are not included in this control plan. Material handling activities performed by USS are also identified on these drawings and are described below. [Figure 2](#) lists USS material processing facilities and their associated control equipment as specified in 326 IAC 6-1-11.1. A general material process flow diagram can be found in [Figure 3](#).

3.4.1 Blast Furnace Dustcatchers

The blast furnace dustcatchers are unloaded into trucks and hauled to the sinter plant storage area. Occasionally a truck may not be available and the content of the dustcatcher is discharged to the ground and a front-end loader transfers this material to the truck. Because the contents of the dustcatchers for blast furnaces 4, 6, and 8 are wetted in a slurry device with water and steam prior to discharge, emissions are normally negligible. If the dust binds in the dustcatcher and plugs the discharge port, significant emissions may result because the material is not thoroughly wetted in the slurry device.

The No. 13 blast furnace dust catcher unloads automatically on a regular cycle throughout the day. The dust is discharged from an intermediate chamber, which is sealed off from the dust catcher, therefore, the dust falls by gravity to a truck or to the ground and fugitive emissions are not significant. Front-end loaders are used to load material to trucks if on the ground.

3.4.2 Revert Coal & Coke Screening

The coal and coke screening operation sizes undersize material into three or more products. These screened products are recycled or sold. Except for periods when the wind speed is very high, no visible emissions are generated.

3.4.3 Coal and Coke Handling

Coal is transported to the plant by rail. Rail cars are unloaded to hoppers and then the coal is transported by covered conveyors to the coal handling facility where it is pulverized and blended. The blended coal is transferred by covered conveyor to the No. 5 and 7 coke batteries (wet-charged) or to the precarbon facilities and then to the No. 2 and 3 batteries.

After the coking process is completed, the coke is pushed into a quench car and transported to the quench tower. The quenched coke is then transferred to the coke wharf where further cooling takes place. The cooled coke slides down the sloped wharf onto a covered belt conveyor system where it is transferred to one of the three coke loading stations (2 & 3 loading station, No. 5 loading station and No. 6 loading station). The unscreened coke is transported by rail to the blast furnaces where it is unloaded, screened and subsequently charged to the blast furnaces.

3.4.4 Destock Coke Screening

Excess production or purchased coke is staged in a storage area at the east end of the plant. This coke is screened for size prior to use at the blast furnaces. A contractor currently performs this screening activity. Material not suitable for use is recycled or sold.

3.4.5 Raw Material Handling at the Sinter Plant

Waste and raw materials are transferred by truck from various areas of the plant to the Sinter Plant storage pile area. These materials are unloaded from the trucks onto specific storage piles. The material in these storage piles is then loaded into trucks by use of front-end loaders and transferred to one of the blending areas. The material is blended and then loaded into trucks and taken to the sinter plant where it is screened and loaded onto a conveyor. The conveyor transfers the screened material to the Sinter Plant storage bins where it is then fed to the sinter machines. The sinter product is transported by conveyor belt from the sinter plant to the highline sinter load-out bins. Transfer cars deposit the sinter into the appropriate blast furnace bins along the highline. Sinter is then drawn from the highline bins into a stockhouse scale car and then deposited into the blast furnace skips.

3.4.6 Ore Unloading

Pellets are received by bulk carriers and are transferred to a belt conveyor by self-unloaders. Pellets are transferred to a stockpile in the West Ore Yard by a conveyor-stacker or by ore bridge. The material is then handled by ore bridge and/or conveyor and deposited at the North or South pellet screening station. The screened pellets are fed by conveyor into the stockhouse of the No. 13 Blast Furnace.

Screened pellets from the south screening station are transported by conveyor to the blast furnace highline load-out bin. Transfer cars transport the pellets from the load-out bin to the appropriate blast furnace bins. The pellets are then drawn from the highline bins into a stockhouse scale car where they are weighed before being deposited into the blast furnace skips.

3.4.7 Mill Scale Recycling

Mill scale is transferred by truck from the 84-inch Hot Strip Mill and the continuous casters to the sinter plant storage area. This material is wet and is unloaded into storage piles prior to being transferred to the blending area.

3.4.8 B-Mix and B-Scrap Recycling

B-Mix and B-Scrap are processed by slag contractors at several locations in the plant. The material is screened, loaded into trucks and transported to the north and south ends of the West Ore Yard on an alternating sequence. The material is then handled by ore bridge and deposited into highline transfer cars. The transfer cars transport the B-Mix or B-Scrap to the appropriate blast furnace highline bins. The material is then drawn from the highline bins into a stockhouse scale car and deposited into the blast furnace skips.

3.4.9 Unloading Burnt Lime and Dolomite

Burnt lime for the No. 1 BOP Shop is unloaded from rail cars at the flux unloading station east of the shop. The railcar is positioned over an underground storage bin and the lime is discharged from the hopper beneath the car into the storage bin. The burnt lime is transferred from the storage bin by covered conveyor to the highline storage bins inside the BOP Shop. The lime is then drawn from the storage bins into the furnace hopper.

Pulverized lime and pebble sized dolomite are both used as fluxing agents at the No. 2 Q-BOP. Pulverized lime is delivered to the flux unloading station south of the Q-BOP in railroad cars. The lime is unloaded through hoppers at the bottom of the cars by introducing low-pressure air into the hoppers so that the lime is fluidized and flows freely into an underground storage bin. The lime is then transferred pneumatically via a 12-inch steel pipe from the bottom of the storage bin to the day storage tank. The day storage tank is located north of the unloading building and holds enough lime to supply the Q-BOP Shop for one day. The lime is again transferred pneumatically from the day tank to three intermediate bins inside the Q-BOP Shop. The lime in the intermediate bins is transferred to the weigh tank by a short air slide. The powdered lime leaving the weigh tank is injected with oxygen through the tuyeres.

Dolomite is unloaded from rail cars or trucks into underground bins at the unloading house. A conveyor that starts 20-feet underground moves the dolomite to the Q-BOP transfer tower and another conveyor transfers the material to the flux floor. From the flux floor another conveyor moves the dolomite to the inside storage bins. The dolomite is then drawn from the bins to the weigh hoppers.

3.4.10 Baghouse Dust Disposal

Particulate from the many baghouses located at the Gary Works are trucked to the appropriate facility for recycle, disposal onsite or offsite. [Figure 2](#) identifies the plant dust control equipment and the disposition of the collected particulate.

3.4.11 Alloy Control

Alloys used for additions during steel making are screened and stored in small piles prior to use. These alloys are loaded by front-end loaders into trucks and transported to the appropriate facility. [top↑](#)

4.0 CONTROL MEASURES

4.1 Paved Roadway Cleaning

Paved roadways within USS Gary Works will be cleaned by using high pressure water flushing and/or vacuum sweeping. The planned cleaning frequency of each paved road segment along with the segment length is listed in [Table 1](#). This frequency may be temporarily or permanently modified if the emissions limitation specified in 326 IAC 6-1-11.1 is exceeded and/or the road silt loading is excessive. Gary Works drawings nos. [GW468068](#) & [GW468069](#) identify paved roadways that require control measures in the plant.

4.2 Paved Parking Area Cleaning

Paved parking areas may be high pressure water flushed and/or vacuum swept to prevent visible particulate emissions from vehicular traffic. Identified lots will be cleaned on as needed basis determined by an opacity-based mechanism where parking areas will be monitored using procedures described in 326 IAC 6-1-11.1. The paved parking areas eligible for control measures are listed in [Table 2](#). Gary Works drawings nos. [GW468068](#) & [GW468069](#) identify lot locations in the plant.

4.3 Unpaved Roadway Treatment

All unpaved roadways listed below in [Table 3](#) are identified on Gary works drawings [GW468070](#) & [GW468071](#) and will be treated with a commercially produced chemical dust suppressant specifically manufactured for that purpose. Application rates and frequencies will be consistent with the manufacturers recommendations to achieve the degree of control required to meet the

applicable emission limitation. At times, recommended application rates may be too high to be absorbed by the roadway in one step. In that case, application will be adjusted in dust suppressant concentration and frequency to ensure proper control of particulate emissions per 326 IAC 6-1-11.1. As an alternative USS may pave previously unpaved road sections and apply paved road cleaning measures to these newly paved roads at frequencies consistent with the existing paved roads in the immediate area.

Gary Works currently uses an asphalt based emulsion dust suppressant to control particulate emissions from unpaved roadways. A material data safety sheet (MSDS) for the current dust suppressant can be found in [Appendix B](#). The minimum application frequencies are shown in [Table 4](#). Note: Contractors are responsible for the treatment of roadways under their control.

4.4 Exposed Area Treatment

Unpaved open areas without roadway designations may require treatment to reduce windblown emissions or to prevent visible emissions from vehicular traffic that utilize these areas. Gary Works will commit to the opacity-based mechanism of the average instantaneous opacity of 10% as described in 326 IAC 6-1-11.1. Application of dust suppressant chemical will be done at a frequency and application rate to effectively control fugitive dust to the above stated opacity limitation. [Table 5](#) lists unpaved open areas currently controlled by chemical dust suppressants at Gary Works and drawings nos. [GW468070](#) and [GW468071](#) show their locations. In addition to chemical treatment, selected open areas have been seeded with vegetation to inhibit the generation of fugitive dust. Current plans are to continue vegetating areas to prevent dust generation in open areas. Note: Contractors are responsible for the treatment of unpaved open areas under their control.

4.5 Material Storage Area Treatment

4.5.1 Sinter Plant Storage Pile Area

Measures to control fugitive emissions generated by mechanical disturbance and wind erosion of the storage piles in the sinter plant area are limited to water spraying, because by specification, hydrocarbon compounds like those contained in the dust suppressant chemicals are strictly limited in the burden materials. This area will be routinely sprayed with water at a rate and frequency necessary to achieve compliance with the applicable emissions limitation.

4.5.2 Coal Stockpile and Delivery Management

Coal stockpile management focuses on the reduction of inventory and land used for coal storage. Coal deliveries are scheduled to maximize availability to utilize coal directly as efficiently as possible. Adherence to shipping schedule is a priority for all concerned parties involved including coal suppliers, railroads and USS.

4.5.3 Coal Storage Pile Areas

A dust suppressant will be applied to coal storage piles, April through November, on an as needed basis to meet the opacity limitation specified in 326 IAC 6-1-11.1. The material safety data sheet for the currently used dust suppressant can be found in [Appendix B](#).

4.5.4 Coke Loading Station Transfers

Coke is transferred to the blast furnaces via three loading stations located at the coke plant. A dust suppressant will be applied at these loading stations should this material transfer activity generate excessive fugitive particulate emissions as specified in 326 IAC 6-1-11.1. The material safety data sheet for the currently used dust suppressant can be found in [Appendix B](#).

4.6 Material Transfer and Inplant Transportation Control

4.6.1 Vehicle Speed Control

All plant roads shall have posted 20 mph speed limits with a few exceptions dependent upon location and utilization. Enforcement of these posted speed limits shall be the responsibility of the various plant security forces who will employ security vehicles and radar.

4.6.2 Inplant Transportation

Inplant transportation of material by truck will be carried out in such a manner that meets the opacity standard found in 326 IAC 6-1-11.1 (d)(6). Material transported by rail or trucks that generate visible particulate emissions will be covered to meet the applicable emission limit.

4.7 Other control Measures

Gary Works has a program to evaluate and improve paved and unpaved roads on an as needed basis when funds are available.

Vacuum sweeping or flushing on paved roads will continue and the unpaved shoulders of the more heavily traveled roads will be treated with a dust suppressant.

The use of open areas as roadways creates a dust problem because vehicles may veer off paved roads to travel on exposed open areas and can track dust onto paved road surfaces. In addition, in some parts of the plant, vehicles can travel in and out of material processing areas although alternate routes can be taken. In order to limit the use of open areas as roadways and reduce the volume of traffic in material processing areas, signs and concrete barriers may be used to redirect traffic at selected locations. The placement of signs and concrete barriers will be coordinated with knowledgeable plant personnel. After the signs and barriers are in place, additional traffic control measures will be evaluated that will further limit the generation of fugitive dust.

As an alternative to eliminate treatment, selected exposed areas may be seeded with an appropriate ground cover to limit or eliminate the generation of fugitive particulate. The type of ground cover to be established will be appropriate to the soil and climatic conditions at the Gary Works, and will be self-sustaining. [top↑](#)

5.0 CONDITIONS PREVENTING USE OF CONTROL MEASURES

Under the following set of conditions, USS Gary Works will not perform the control measures as listed above.

5.1 Conditions for Paved Roads

The cleaning of paved road segments may be delayed when:

- It is raining or snowing at the time of the scheduled cleaning.
- Rain of 0.1 or more inches or 0.5 inches or more of snow has accumulated during the 24-hour period prior to the scheduled cleaning.
- The temperature is below 32°F at the scheduled time of cleaning, use of high pressure water flushing will be discontinued due to the potential for ice buildup on roadways.
- The road segment is closed or abandoned. Abandoned roads will be barricaded to prevent vehicle access.
- Treatment is not required because the roadway meets the opacity limitation specified in 326 IAC 6-1-11.1.

In the event that consecutive rain or snow days create a condition where a severe backlog of road segments to be cleaned exists, USS will make a reasonable effort to eliminate this backlog as soon as conditions permit.

5.2 Conditions for Unpaved Roadways and Areas and Storage Piles

The treating of unpaved road segments, unpaved areas, or storage piles may be delayed when:

- It is raining or snowing at the time of the scheduled treatment.
- Greater than 0.1 inches of rain or 0.5 inches of snow has accumulated during the 24-hour period prior to the scheduled treatment.
- Road segments, areas, or piles are saturated with water such that chemical dust suppressants cannot be accepted by the surface.

- Road segments, areas, or piles are frozen or covered by ice, snow or standing water.
- The road segment or area is closed or abandoned. Abandoned roads will be barricaded.
- Treatment is not required because the unpaved road or open area meets the opacity limitation specified in 326 IAC 6-1-11.1.
- Sustained wind speeds are excessive.

The treatment of exposed areas and storage piles may be temporarily suspended during periods when excessive wind speeds would result in ineffective or wasteful chemical use. [top↑](#)

6.0 SCHEDULE FOR ACHIEVING COMPLIANCE

6.1 Road Paving Program

Road paving and repairing is an ongoing program at the plant. It is expected that the paving of unpaved roads, and paved roads in poor condition, will continue.

6.2 Road Cleaning Program

The road cleaning program was implemented on January 1, 1994, and continues.

6.3 Storage Pile, Material Handling & Transfer, and Exposed Area Treatment

The treatment of storage piles, material handling and transfer activities, and exposed areas was implemented on January 1, 1994, and continues.

6.4 Other Fugitive Dust Control Activities

Other fugitive dust control measures as described in Section 4.7 will continue. [top↑](#)

7.0 RECORD KEEPING AND REPORTING

7.1 Drawings Showing Controlled Emission Sources

The drawings showing the locations of the controlled roadways, parking lots, storage piles, open areas, and material handling will be kept in the Environmental Control Division Office.

Drawings will also be maintained showing the locations of all areas under the control of outside contractors at USS Gary Works.

7.2 Records of Water or Chemical Applications

Records will be kept on file of all sweeping and flushing and chemical treatments that are performed on the fugitive dust sources covered by this control plan. These forms will be kept in the Environmental Compliance, Energy and Environmental Control Division Office. The following information will be contained on the form:

- The name and location of the roadway, area, or pile controlled.
- The application rate.
- The time of each application.
- The area covered by each application.
- Identification of each method of application.
- The total quantity of water or chemical used for each application.
- For each application of chemical solution, the concentration and identity of the chemical.

If special physical or chemical treatment occurs on an area or facility within the plant as specified in 326 IAC 6-1-11.1 part (e), paragraph (4)(C), the following information will be provided in the log:

- The name of the physical or chemical agent used.
- The location of the application,
- The application rate.
- The total quantity of agent used.
- If the agent was diluted, the percent of concentration.

7.3 Records of Eliminated or Delayed Treatments

A log will be maintained for the reporting of incidents that prevent the application of control measures. For each incident, the date along with a specific explanation as to why the control measures were not implemented will be provided. This notation should also include any necessary corrective action to be taken.

7.4 Maintenance of Records

A section will be established within the Environmental Control Division Office for the Storage of five (5) years of records pertaining to fugitive particulate control measures. Copies of all records required will be submitted to IDEM within twenty (20) working days upon written request. These records will be available for inspection and copying by IDEM department representatives during normal working hours.

7.5 Quarterly Reports

A quarterly report will be submitted by the Environmental Control Division Office containing the following information:

- The dates on which any of the required control measures were not implemented.
- A listing of the above control measures.
- The reasons that the control measures were not implemented.
- Any corrective action taken, that may be necessary.

This report will be submitted to the IDEM within 30 calendar days after the end of the quarter. The quarters end on March 31, June 30, September 30, and December 31.

7.6 Changing of Control Plan

The plan administrator will review and update the plan as necessary. A copy of the revised plan will be provided to IDEM upon request. The plan will also be revised if IDEM determines that the requirements of the control plan have not been met and requests such revisions in writing. The plan will also be revised if a significant change occurs on a road, area, or transfer procedure which would make the current control measure obsolete, such as an unpaved road being paved.
top↑

8.0 FUGITIVE EMISSION MONITORING PROGRAM

8.1 Silt Sampling of Paved Road

If requested by IDEM, USS Gary Works will provide representative silt loading measurements for a maximum of ten paved roads per month during the months of April through November. Silt loadings will be measured in accordance with the procedures provided in the Rule. IDEM will have the right to specify the road segments to be sampled.

8.2 Opacity Monitoring of Fugitive Emission Sources

A visible emission based mechanism as described in 326 IAC 6-1-11.1 (d)(1-9) will be used to determine the effectiveness of this treatment program. Opacity readings will be taken one day per month of paved and unpaved roads, parking lots, material handling, processing, transfer activities, wind erosion of storage piles and exposed areas during the months of April through November. Opacity readings will help to determine the effectiveness of the program and identify areas where corrective action may be necessary to maintain compliance. [top↑](#)

LIST OF DRAWINGS

[GW468068 - Paved Roadways and Paved Parking Lots \(West\)](#)
[GW468069 - Paved Roadways and Paved Parking Lots \(East\)](#)
[GW468070 - Unpaved Roadways and Open Areas \(West\)](#)
[GW468071 - Unpaved Roadways and Open Areas \(East\)](#)
[GW487814 - Storage Piles and Material Handling \(West\)](#)
[GW487815 - Storage Piles and Material Handling \(East\)](#)

TABLES

[Table 1 - Paved Roads](#)
[Table 2 - Paved Parking Lots](#)
[Table 3 - Unpaved Roads](#)
[Table 4 - Control Levels of Applications to Unpaved Roads](#)
[Table 5 - Unpaved Open Areas](#)

APPENDICES

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[B roads](#)
[C roads](#)
[D roads](#)
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[Appendix B \(Material Safety Data Sheets for Dust Suppressants\) top↑](#)

[Asphotac 18883 MSDS](#)

[EC-46 MSDS](#)

[PetroTac MSDS](#)