



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 22 2016

REPLY TO THE ATTENTION OF:

Matt Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency reviewed the draft part 70 significant permit modification for ESSROC Cement Corporation, permit number 019-35535-00008. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments:

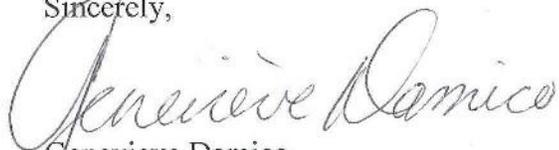
- 1.) Pages 14-15 of appendix A to the technical support document (TSD) shows Kiln #2's uncontrolled liquid waste derived fuel (LWDF) combustion potential to emit calculated using AP-42 emission factors. Page 4 of the TSD explains that the LWDF to be combusted in Kiln #2 is blended, analyzed, certified, and shipped from ESSROC's Logansport facility. Since ESSROC's Logansport facility may already analyze the LWDF, more representative LWDF emission factors are likely be available to estimate Kiln #2's combustion emissions. It is our understanding that AP-42 emission factors were used in this case as a conservative estimate of Kiln #2's emissions while combusting LWDF, but the justification to use AP-42 emission factors over representative emission factors, if available, is not included in the TSD. Please clarify whether LWDF emission factors are available. If LWDF emission factors are available, then please provide further justification regarding the use of AP-42 emission factors over LWDF emission factors to estimate Kiln #2's LWDF combustion emissions.
- 2.) Permit condition D.3.19 requires a fuel analysis or fuel specification to determine the content of lead, mercury, and beryllium present in each fuel combusted in Kiln #2. The fuel analysis results are then used to calculate the lead, mercury, and beryllium input into Kiln #2 on a rolling twelve-month basis. We understand that there may occasionally be analyses that indicate the content of lead, mercury, or beryllium for a given fuel is below an analysis' detection threshold. Please clarify what value the source is required to use when calculating mercury, lead, or beryllium input if the fuel analysis shows that the

metal content is below the detection threshold. In order to avoid underestimation of each fuel's metal content, we recommend that the source use the full detection threshold as a conservative value. If necessary, please update the permit to specify the value the source is required to use in this instance.

- 3.) Permit condition F.2.2 incorporates the requirements of 40 CFR Part 63, Subpart LLL (Portland Cement MACT). Permit condition F.2.2 identifies EU20 and EU27 (Kiln #1 and Kiln #2, respectively) as affected sources. Permit condition F.2.2(5) incorporates the emission limitations given at 40 CFR 63.1343(b)(1), Table 1: Lines 7, 8, and 13. However, 40 CFR 63.1343(b)(1), Table 1, also includes emission limitations that apply to existing kilns (Table 1: Lines 1-3) that are not included in the permit. We request that you determine whether the emission limitations applicable to existing kilns should be included in the permit and revise the permit if necessary. We further request that you verify that all other applicable Portland Cement MACT requirements are included in the permit.
- 4.) Permit condition F.7.2 states that the source is subject to 40 CFR Part 63, Subpart EEE, (HWC MACT) after the first LWDF is combusted in Kiln #2 and thereafter when combusting LWDF. However, page 19 of the TSD explains that the source will be required to comply with the HWC MACT after initial combustion of LWDF in Kiln #2 even when hazardous waste is not being combusted. As written, permit condition F.7.2 requires compliance with the HWC MACT only while combusting LWDF. Please revise permit condition F.7.2. to specify that the HWC MACT applies to Kiln #2 at all times after it first combusts LWDF.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,


Genevieve Damico
Chief
Air Permits Section