



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

REPLY TO THE ATTENTION OF:

FEB 03 2016

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 has reviewed the draft part 70 operating permit renewal, permit number T089-36071-00173, for Mid-Continent Coal & Coke Company. 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.) The 90 HP generator (Gen1) is subject to 40 C.F.R. 60, Subpart IIII -- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (Subpart IIII). The permit incorporates Subpart IIII by reference and indicates applicable portions in Condition E.1.2.

The permit record does not indicate the model year of Gen1, its displacement per cylinder, and whether it is equipped with a diesel particulate filter to comply with the emission standards in 40 C.F.R. § 60.4204. This information is necessary to ascertain the applicability of portions of Subpart IIII that are cited in the permit, including:

Permit Condition	Subpart IIII Reference	Comment
E.1.2.(3)	40 C.F.R. § 60.4204(a),(b)	<p>§ 60.4204(a) applies to pre-2007 model year emission units, and § 60.4204(b) applies to 2007 model year and later. Gen1 cannot be subject to both.</p> <p>§ 60.4204(a) and (b) both contain decision trees based upon the emission unit's displacement per cylinder.</p>

E.1.2.(6)	40 C.F.R. § 60.4209(b)	Only applies to emission units equipped with a diesel particulate filter to comply with the emission standards in 40 C.F.R. § 60.4204.
E.1.2.(7)	40 C.F.R. § 60.4211(b),(c),(d)	<p>§ 60.4211(b) applies to pre-2007 model year emission units, and § 60.4211(e) applies to 2007 model year and later. Gen1 cannot be subject to both.</p> <p>The applicability of § 60.4211(d) is based upon on the emission unit's displacement per cylinder. Gen1 cannot be subject to both § 60.4211(d) and § 60.4204(a) or (b).</p>

We request that you review the applicability of the above portions of Subpart IIII and revise the permit record accordingly.

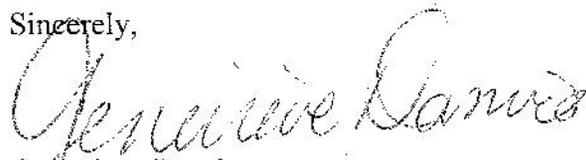
- 2.) Condition E.1.2 indicates that Gen1 is subject to the portions of Subpart IIII that apply only to emergency stationary internal combustion engines (ICE). These portions include:

Permit Condition	Subpart IIII Reference	Comment
E.1.2.(6)	40 C.F.R. § 60.4209(a)	Only applies to emergency stationary ICE.
E.1.2.(7)	40 C.F.R. § 60.4211(f)	

The permit record does not contain information to support the determination that Gen1 is an emergency stationary ICE as defined in 40 C.F.R. § 60.4219. We request that the permit record include additional information to support such a determination, or that 40 C.F.R. §§ 60.4209(a) and 60.4211(f) are removed from the list of applicable permit requirements.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Paymon Danesh, of my staff, at (312) 886-6219.

Sincerely,


Genevieve Damico
Chief
Air Permits Section