



**Cokenergy LLC**

3210 Watling Street MC 2-991  
East Chicago, IN 46312

December 18, 2018

Keith Baugues  
Assistant Commissioner  
Indiana Department of Environmental Management  
Office of Air Quality  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

Nancy King  
Assistant Commissioner  
Indiana Department of Environmental Management  
Office of Legal Counsel  
100 North Senate Avenue  
Indianapolis, IN 46204-2251

**RE:** Application for Site-Specific Revision to Indiana State Implementation Plan

Dear Mr. Baugues and Ms. King:

Indiana Harbor Coke Company (“IHCC”) and Cokenergy, LLC (“Cokenergy”) hereby apply for a site-specific revision to the Indiana State Implementation Plan (“SIP”) at 326 IAC 7-4.1-7 and 326 IAC 7-4.1-8 pursuant to Paragraph 27.b of the consent decree between the United States, the State of Indiana, IHCC, SunCoke Energy, Inc., and Cokenergy entered in the United States District Court for the Northern District of Indiana (Case No.: 2:18-cv-00035) on October 25, 2018 (“Consent Decree”).

The Consent Decree requires that the Indiana SIP be modified to incorporate: (1) the annual bypass venting limits in Paragraph 14 of the Consent Decree; and (2) the requirement to operate and maintain a permanent flow monitor in Paragraph 19 of the Consent Decree (for Cokenergy only). We have attached a markup of the SIP with proposed changes consistent with these requirements and a copy of the Consent Decree. The Consent Decree is also available on the IDEM website at [https://www.in.gov/idem/airquality/files/indiana\\_harbor\\_cd.pdf](https://www.in.gov/idem/airquality/files/indiana_harbor_cd.pdf).

We appreciate IDEM’s assistance with this rulemaking effort. If you have any questions, please contact me at (219) 397-3976 or [lford@primaryenergy.com](mailto:lford@primaryenergy.com).

Sincerely,

Luke E. Ford  
Director EH&S  
Primary Energy

attachments

cc:

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**326 IAC 7-4.1-7 Cokenergy Inc. sulfur dioxide emission limitations**

Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11

Affected: IC 13-15; IC 13-17

Sec. 7. (a) Cokenergy Inc., Source Identification Number 00383, shall comply with the sulfur dioxide emission limit in pounds per hour for the heat recovery coke carbonization waste gas stack, identified as Stack ID 201, combined with the sixteen (16) vents from the Indiana Harbor Coke Company of a twenty-four (24) hour average emission rate of one thousand six hundred fifty-six (1,656) pounds per hour.

(b) Cokenergy shall install, operate, and maintain a permanent flow monitor to continuously measure the flow rate in Stack ID 201.

(c) A maximum of twelve percent (12%) of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks on an annual basis from January 1, 2017 through December 31, 2019. A maximum of thirteen percent (13%) of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks on an annual basis beginning on January 1, 2020. Beginning on January 1, 2020, if Cokenergy undertakes heat recovery steam generator (HRSG) retubing, then in that calendar year a maximum of 14% of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks, as determined on an annual basis, provided the bypass venting percentage resulting from HRSG retubing accounts for at least 3.25% annual bypass venting. Bypass venting resulting from tube leaks, inspections, routine cleaning or maintenance, or unplanned HRSG outages shall not count in calculating the bypass venting percentage resulting from HRSG retubing. (Air Pollution Control Division; 326 IAC 7-4.1-7; filed May 25, 2005, 10:50 a.m.: 28 IR 2957)

**326 IAC 7-4.1-8 Indiana Harbor Coke Company sulfur dioxide emission limitations**

Authority: IC 13-14-8; IC 13-17-3-4; IC 13-17-3-11

Affected: IC 13-15; IC 13-17

Sec. 8. (a) Indiana Harbor Coke Company (IHCC), Source Identification Number 00382, shall comply with the sulfur dioxide emission limits in pounds per ton, pounds per hour, and other requirements as follows:

Emissions Unit Description	Emission Limit lbs/ton	Emission Limit lbs/hour
(1) IHCC Coal Carbonization Charging	0.0068 each	1.57 total
(2) IHCC Coal Carbonization Pushing	0.0084	1.96
(3) IHCC Coal Carbonization Quenching	0.0053	1.232 total
(4) IHCC Coal Carbonization Thaw Shed	0.0006 lbs/1,000 cubic feet natural gas	0.015
(5) IHCC Vent Stacks (16 total) in combination with Cokenergy's heat recovery coke carbonization waste gas stack identified as Stack ID 201		1,656 total for a 24 hour average

(b) The coke ovens shall recycle the gases emitted during the coking process and utilize it as the only fuel source for the ovens during normal operations. The gases shall not be routed directly to the atmosphere unless they first pass through the common tunnel afterburner. A maximum of nineteen percent (19%) of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere on a twenty-four (24) hour basis and fourteen percent (14%) on an annual basis.

(c) A maximum of twelve percent (12%) of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks on an annual basis from January 1, 2017 through December 31, 2019. A maximum of thirteen percent (13%) of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks on an annual basis beginning on January 1, 2020. Beginning on January 1, 2020, if Cokenergy undertakes heat recovery steam generator (HRSG) retubing, then in that calendar year a maximum of 14% of the coke oven waste gases leaving the common tunnel shall be allowed to be vented to the atmosphere through the bypass vent stacks, as determined on an annual basis, provided the bypass venting percentage resulting from HRSG retubing accounts for at least 3.25% annual bypass venting. Bypass venting resulting from tube leaks, inspections, routine cleaning or maintenance, or unplanned HRSG outages shall not count in calculating the bypass venting percentage resulting from HRSG retubing. (Air Pollution Control Division; 326 IAC 7-4.1-8; filed May 25, 2005, 10:50 a.m.: 28 IR 2957)