



Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

December 05, 2016

Mr. Robert Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: State Implementation Plan Submittal for
Indiana Regarding 1-Hour SO₂ Attainment
SABIC Innovative Plastics in Posey
County, Indiana (Commissioner's Order
#2016-03) Addendum Documentation of
the Public Participation Process

Dear Mr. Kaplan:

Pursuant to Section 110 of the Clean Air Act (CAA) and Title 13 of the Indiana Code (IC), the Indiana Department of Environmental Management (IDEM) submits an amendment to the Indiana state implementation plan (SIP) for SABIC Innovative Plastics (SABIC) accomplished by Commissioner's Order #2016-03. IDEM submitted a request for parallel processing of the amendment to Indiana's SIP on October 25, 2016. IDEM scheduled a public hearing concerning the proposed SIP revision on December 01, 2016, and the public comment period concluded on December 02, 2016. No comments were received during the public comment period. Additionally, there was no request for a public hearing during the comment period, thus a hearing was not held.

The attached enclosure consists of the following:

- Commissioner's Order #2016-03 issued on October 20, 2016, that establishes permanent and enforceable sulfur dioxide (SO₂) emission limits for SABIC, located in Posey County, Indiana, in order to ensure continued attainment of the 2010 primary 1-hour SO₂ standard in the area surrounding the facility. The Commissioner's Order contains emission limitations and emission rates for all of SABIC's SO₂ emission units, as well as reporting and recordkeeping requirements and method for compliance. The compliance date for the emission limitations in the Commissioner's Order is January 13, 2017. It contains and meets the requirements set forth in 42 U.S.C. §7407(d)(3)(E)(iii) and the conditions will become applicable requirements as defined in 326 IAC 2-7-1(6).

Mr. Robert Kaplan
Page 2 of 2

- Administrative checklist, modeling summary and documentation of the public participation process.

This submittal consists of one (1) hard copy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hard copy has been sent to Doug Aburano, Chief of U.S. EPA Region 5's Attainment Planning and Maintenance Section and Chris Panos of U.S. EPA Region 5.

IDEM requests that U.S. EPA proceed with review and approval of this amendment to Indiana's SIP. If you have any questions or need additional information, please contact Brian Callahan, Chief, Air Quality Standards and Implementation Section, Office of Air Quality at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,



Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sad/bec/gf/mlb

Attachments: Supporting Documents

cc: Doug Aburano, U.S. EPA Region 5 (no enclosures)
John Mooney, U.S. EPA Region 5 (no enclosures)
Steve Rosenthal, U.S. EPA Region 5 (no enclosures)
Pamela Blakley, U.S. EPA Region 5 (no enclosures)
John Summerhays, U.S. EPA Region 5 (no enclosures)
Keith Baugues, IDEM-OAQ (no enclosures)
Scott Deloney, IDEM-OAQ (no enclosures)
Mark Derf, IDEM-OAQ (w/ enclosures)
Mike Mosier, IDEM-OAQ (no enclosures)
Christine Pedersen, IDEM-OAQ (no enclosures)
Betsy Zlatos, IDEM-OAQ (no enclosures)
Brian Callahan, IDEM-OAQ (w/ enclosure)
File Copy

Supporting Documents

Attachment A: Administrative Checklist (40 CFR 51, Appendix V)

Attachment B: Commissioner's Order #2016-03

Attachment C: Legal Notice of Public Hearing and Certificates of Web Publication

Attachment D: Modeling Summary

Data, calculations, and methodology for determining emission limitations and emission rates for all of SABIC's sulfur dioxide emission units (available upon request).

Attachment A

Administrative Checklist

ADMINISTRATIVE CHECKLIST (40 CFR 51, Appendix V)

- | | |
|---|------------------------------|
| 1. The submittal is accompanied by a formal letter of submittal from the governor or his designee. | Enclosed |
| 2. Evidence that the State has adopted the plan in the State code or body of regulations; or issued the permit, order, consent agreement ("document"); in final form. | Attachment B |
| a. Date of adoption or final issuance: | October 20, 2016 |
| b. The effective date of the plan, if different from the adoption/issuance date. | January 13, 2017 |
| 3. Evidence that the State has the necessary legal authority under state law to adopt and implement the plan. | IC 13-14-1-9
IC 13-14-2-1 |
| 4. A copy of the actual regulation or document submitted for approval and incorporation by reference into the plan, including the following: | Attachment B |
| a. Indication of the changes made to the existing approved plan, where applicable. | |
| b. The submittal shall be a copy of the official State regulation or document signed, stamped, dated by the appropriate state official indicating that it is fully enforceable by the State. Effective date shall be stated in the document itself. | |
| 5. Evidence that the State followed all of the procedural requirements of the State's laws and constitution in conducting and completing the adoption/issuance of the plan. | Attachment B |
| 6. Evidence that public notice was given, including date of proof of publication. | Attachment C |
| 7. Certification that public hearings were held in accordance with information provided in public hearing notice. | Attachment C |
| 8. Compilation of public comments and State's response. | Attachment C |
| 9. Technical Support Document (if source specific change). | Attachment D |

Attachment B

Commissioner's Order for SABIC Innovative
Plastics addressing the 1-hour SO₂ NAAQS

Posey County



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

STATE OF INDIANA
COUNTY OF MARION

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SS:

BEFORE THE INDIANA DEPARTMENT
OF ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF:
ORDER OF THE COMMISSIONER
PURSUANT TO IC 13-14-2-1
FOR SABIC INNOVATIVE PLASTICS
MT. VERNON, LLC

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NOTICE AND ORDER OF THE COMMISSIONER OF THE INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

On September 9, 2016, SABIC Innovative Plastics Mt. Vernon, LLC (SABIC) submitted a Petition to the Commissioner of the Indiana Department of Environmental Management (IDEM) that requested that the Commissioner limit the emissions of Sulfur Dioxide (SO₂) from SABIC's Mt. Vernon plant. The purpose of the petition request was to allow SABIC to limit its SO₂ emissions below the applicability threshold of the federal SO₂ Data Requirements Rule at 40 CFR 51 Subpart BB and concurrently ensure compliance with the 2010 1-hour SO₂ National Ambient Air Quality Standard (NAAQS). The Commissioner has determined that the Petition should be granted according to the terms specified below:

LEGAL BACKGROUND

SABIC Innovative Plastics Mt. Vernon, LLC owns a stationary integrated plastics and engineering resin manufacturing facility with Source I.D. Number 129-00002, located at 1 Lexan Lane in Mount Vernon, Posey County, Indiana, and permitted under the Part 70 air operating permit program.

The United States Environmental Protection Agency (U.S. EPA) published the final Data Requirements Rule (DRR) for the 2010 1-hour SO₂ Primary National Ambient Air Quality Standard (NAAQS), in the *Federal Register* on August 21, 2015 (80 FR 51052). The DRR was promulgated in order to establish minimum requirements for air agencies to characterize 1-hour SO₂ air quality concentrations across the country, with an emphasis on doing so in the vicinity of sources that have the largest annual SO₂ emissions to aid in the implementation of the 2010 primary 1-hour SO₂ standard. Implementation of the new 1-hour SO₂ standard began in 2013 when U.S. EPA established nonattainment areas based on monitoring data. On March 2, 2015, U.S. EPA entered into a federal Consent Decree with the Sierra Club and Natural Resources Defense Council (NRDC) that established a timeline for the completion of air quality characterizations and designations in all remaining areas of the country. The Consent Decree required U.S. EPA to complete the designations in three additional rounds: Round 2 by July 2, 2016, Round 3 by December 31, 2017, and Round 4 by December 31, 2020.

On January 7, 2016, Indiana submitted to U.S. EPA a list of 11 stationary sources, including SABIC, for air quality characterization pursuant to the DRR requirements as part of the Round 3 designation process. The DRR considers air dispersion modeling and ambient air monitoring appropriate ways to assess local SO₂ concentrations and the DRR also provides states with a third option to establish a permanent and federally enforceable facility-wide limit on SO₂ emissions from a listed source to below 2,000 tons per year. A source that limits its SO₂ emissions under the third option is not subject to the requirements for air quality characterization.

Indiana informed U.S. EPA on June 30, 2016 that SABIC had selected the DRR modeling option to characterize the ambient air quality in the area. Subsequently, Indiana has learned that modifications made at the SABIC facility due to a Co-Gen project that was permitted as PSD/Significant Source Modification No.: 129-33998-00002 and issued on November 20, 2014 have resulted in the reduction of potential SO₂ emissions at the facility.

On September 9, 2016, SABIC submitted a request to the Commissioner to impose permanent and federally enforceable SO₂ emission limitations and emission rates on SABIC in order to ensure continued attainment of the SO₂ NAAQS in the area surrounding SABIC. SABIC proposed SO₂ emission limitations, applicable to specific emissions units and source-wide, as follows:

- a. Limitation on source-wide SO₂ emissions of 2,000 tons per year;
- b. Limitation on SO₂ emissions from 08-706 COS Vent Oxidizer and 08-708 COS Flare;
- c. Limitation on sulfur content of diesel fuel used in diesel-powered engines; and
- d. Limitation requiring coal-fired boilers (01-001 BW1-BOILER, 01-001 BW2-BOILER and 09-002 E-BOILER) at the facility to permanently cease operation prior to January 13, 2017.

Pursuant to IC 13-14-2-1(b) and IC 13-14-2-7(1), the Commissioner may issue Orders to secure compliance with Indiana's environmental statutes and rules, including the ambient air quality standard for SO₂ at 326 Indiana Administrative Code ("IAC") 1-3-4(b)(1)(A).

FINDINGS

Based on the foregoing information, IDEM, through its Commissioner, finds the following:

1. Permanent and enforceable SO₂ emission limitations and emission rates for SABIC are required that limit SO₂ emissions in order to provide assurance of attainment of the 2010 1-hour SO₂ NAAQS in the area surrounding SABIC's facility without continued assessment of the SO₂ concentrations through air dispersion modeling or ambient air monitoring.
2. Adding SO₂ emission limitations and emission rates to SABIC's Part 70 Operating Permit, while federally enforceable, is not permanent and, therefore, is not adequate to assure continued attainment of the SO₂ NAAQS. An Order of the Commissioner of IDEM (Order) is

required to ensure SO₂ emission limitations and emission rates remain permanent and enforceable, as required by 42 U.S.C. § 7407(d)(3)(E)(iii).

3. In addition, the approval by U.S. EPA of the Order into the Indiana State Implementation Plan ("SIP") is required to make the Order requirements permanent and federally enforceable. Upon approval into the Indiana SIP, the Order requirements become applicable requirements as defined in 326 IAC 2-7-1(6).

4. Based on modeling conducted by IDEM, the SO₂ emission limitations and emission rates proposed by SABIC were clarified and adjusted in order to assure continued attainment of the 1-hour SO₂ NAAQS. The annual source-wide SO₂ limitation of 2,000 tons was not necessary in order to demonstrate compliance with the DRR.

This Notice and Order of the Commissioner of the Indiana Department of Environmental Management (Order) is issued pursuant to Indiana Code (IC) 13-14-1-9, IC 13-14-2-1, and IC 13-14-2-7.

ORDER

1. SO₂ emission limitations and emission rates are set forth below for the following emission units: 01-101 NE BOILER, 01-014 BW GAS, 08-706 COS Vent Oxidizer, 08-707 COS Flare, 12-701 H-790, 03-007 H-520, 03-008 H-530A, 03-008 H-530B, 12-169 H-390, 13-049 H-900, 13-321 H-900B, 13-155 SC-1/2, 04-063 H-7090, 04-050 H-6060, 08-001 F-972, 19-001 COGEN, 19-002 AUX BOILER, 19-003 AUX2 BOILER, 19-004 CG1 BOILER, 09-106 R BOILER.

2. The COS Vent Oxidizer and the COS Flare shall not exceed the following SO₂ emission rates:

- a. 415 lb/hr, one (1) hour average; and
- b. 269.21 lb/hr, twenty-four (24) hour rolling average, based on daily coke usage and daily sulfur input.

3. The NE BOILER (01-101) shall not exceed an SO₂ emission rate of 0.15 lb/hr, one (1) hour average.

4. The BW GAS (01-014) shall not exceed an SO₂ emission rate of 0.15 lb/hr, one (1) hour average.

5. The H-790 (12-701) shall not exceed an SO₂ emission rate of 0.02 lb/hr, one (1) hour average.

6. The H-520 (03-007) shall not exceed an SO₂ emission rate of 0.0045 lb/hr, one (1) hour average.

7. The H-530A (03-008) shall not exceed an SO₂ emission rate of 27.8 lb/hr, one (1) hour average.

8. The H-530B (03-008) shall not exceed an SO₂ emission rate of 27.8 lb/hr, one (1) hour average.
9. The H-390 (12-169) shall not exceed an SO₂ emission rate of 0.0102 lb/hr, one (1) hour average.
10. The H-900 (13-049) shall not exceed an SO₂ emission rate of 1.86 lb/hr, one (1) hour average.
11. The H-900B (13-321) shall not exceed an SO₂ emission rate of 0.0188 lb/hr, one (1) hour average.
12. The SC 1/2 (13-155) shall not exceed an SO₂ emission rate of 0.0008 lb/hr, one (1) hour average.
13. The H-7090 (04-063) shall not exceed an SO₂ emission rate of 0.00235 lb/hr, one (1) hour average.
14. The H-6060 (04-050) shall not exceed an SO₂ emission rate of 0.00153 lb/hr, one (1) hour average.
15. The F-972 (08-001) shall not exceed an SO₂ emission rate of 0.518 lb/hr, one (1) hour average.
16. The COGEN (19-001) shall not exceed an SO₂ emission rate of 1.17 lb/hr, one (1) hour average.
17. The AUX BOILER (19-002) shall not exceed an SO₂ emission rate of 0.15 lb/hr, one (1) hour average.
18. The AUX2 BOILER (19-003) shall not exceed an SO₂ emission rate of 0.15 lb/hr, one (1) hour average.
19. The CG1 BOILER (19-004), if constructed, shall not exceed an SO₂ emission rate of 0.15 lb/hr, one (1) hour average.
20. The R BOILER (09-106) shall not exceed an SO₂ emission rate of 0.11 lb/hr, one (1) hour average.
21. To achieve the SO₂ emission rate and emission limitation in Paragraph 2.a, daily sulfur input to the carbon monoxide generators, identified as COG1, COG2, COG3, COG4, COG5, COG6, COG7, COG8, COG9, COG10, COG11, COG12, COG13, COG14, COG15, and COG16, shall be limited to no more than 2.49 tons per day.
22. All site emergency generators and pumps, standby energy curtailment diesel generators and mobile diesel units, temporary and portable emergency generators shall operate on No. 2 diesel fuel containing 15 parts per million (ppm) by weight or less of sulfur.
23. SABIC shall comply with the SO₂ emission limitations and emission rates, and the No. 2 diesel fuel sulfur content limit, beginning January 13, 2017.

24. As required by 326 IAC 2-7-2(d)(1) and 326 IAC 2-7-5, SABIC shall apply to incorporate Order requirements, including reporting and recordkeeping requirements and methods to determine compliance, into its Part 70 Operating Permit within ninety (90) days of U.S. EPA approval of the Commissioner's Order into the Indiana SIP.

25. From January 13, 2017 until IDEM issues a Permit incorporating Order requirements, SABIC shall comply with the reporting and recordkeeping requirements and methods to determine compliance specified in this paragraph.

a. Reporting: SABIC shall submit to IDEM, on a quarterly basis, a report of the daily coke input and corresponding sulfur content for the COS Vent Oxidizer and COS Flare.

b. Recordkeeping: SABIC shall maintain records of daily coke input and corresponding sulfur content, and sulfur content of No. 2 diesel fuel.

c. Method to determine compliance: Compliance shall be determined on a daily basis, based on 326 IAC 3-5.

i. Daily sulfur input for the group of carbon monoxide generators (COG1-16), calculated by taking the daily coke usage and multiplying by the percent weight of corresponding sulfur content.

ii. The sulfur content of the coke used in the carbon monoxide generators shall be analyzed daily as received (vendor delivery analysis may be used, approved by IDEM on 08/01/2005) for each day the carbon monoxide generators operate.

iii. Actual fuel usage for natural gas, diesel and fuel oil and liquid waste fuel-fired emission units or, in the alternative, the maximum design fuel usage.

26. This Order shall apply to and be binding upon SABIC, its successors and assigns. No change in ownership, corporate, or partnership status of SABIC shall in any way alter its status or responsibilities under this Order.

27. The requirements of this Order supersede any less stringent requirements applicable to SABIC.

EFFECTIVE DATE OF ORDER

Pursuant to IC 13-14-2-1(d), IC 4-21.5-3-1, IC 4-21.5-3-5(a)(6), and 40 Code of Federal Regulations ("CFR") 51.102, IDEM will give notice of this Order to each entity to whom the Order is directed and affected neighbors by mailing and to the general public by web publication.

Pursuant to IC 4-21.5-3-7(a)(3), IC 4-21.5-3-2(e), and IC 4-21.5-3-5, this Order may be appealed by filing a Petition for review within eighteen (18) days after the date affected persons were given notice of the Order by U.S. mail. Information on petitions for review of this Order can be found at IC 4-21.5-3-7.

Pursuant to IC 4-21.5-3-5(f) and IC 4-21.5-3-2(e), the Order is effective eighteen (18) days from mailing of notice unless a Petition for review has been filed before or on the eighteenth (18th) day. However, the compliance date for the emission limitations in this Order is January 13, 2017.

Pursuant to 40 CFR 51.103, IDEM will submit this Order to U.S. EPA as a revision to the Indiana SIP. Upon approval by the U.S. EPA, this Order will be part of the Indiana SIP.

Persons seeking judicial review of this Order may do so in accordance with IC 4-21.5-5.

If you have procedural or scheduling questions regarding your request for review, you may contact the Office of Environmental Adjudication at (317) 232-8591. If you have questions regarding this Order, please contact Mark Derf, Office of Air Quality, by telephone at (317) 233-5682 or email at MDERF@idem.IN.gov.

Dated at Indianapolis, Indiana this 20th day of October, 2016.

A handwritten signature in black ink, appearing to read "Carol S. Comer", is written over a horizontal line.

Carol S. Comer
Commissioner
Indiana Department of Environmental Management

Attachment C

Public Participation Documentation



Indiana Department of Environmental Management

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Michael R. Pence
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Carol S. Comer
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Legal Notice for Public Hearing State Implementation Plan (SIP) Submittal

SABIC Innovative Plastics Mt. Vernon, LLC (SABIC)
Commissioner's Order No 2016-03

Notice is hereby given under 40 CFR 51.102 that the Indiana Department of Environmental Management ("IDEM") is accepting written comments and providing an opportunity for a public hearing regarding a revision to the Indiana State Implementation Plan (SIP) for SABIC Innovative Plastics Mt. Vernon, LLC (SABIC), Source I.D. Number 129-00002, located at 1 Lexan Lane in Mount Vernon, Posey County, Indiana. All interested persons are invited and will be given reasonable opportunity to express their views concerning the proposed revision to the SIP.

The purpose of this notice is to solicit public comment on a proposed revision to the SIP that is accomplished by Commissioner's Order No. 2016-03 for SABIC Innovative Plastics. The Commissioner's Order imposes a sulfur dioxide emission limit upon SABIC Innovative Plastics. This Commissioner's Order will be submitted to the United States Environmental Protection Agency ("U.S. EPA") for approval as a revision to the Indiana SIP.

Any person may submit written comments on the proposed SIP revision. Written comments must be postmarked or delivered in person on or before December 2, 2016.

Any person may request a public hearing on the proposed SIP revision. Requests for a public hearing must be submitted on or before November 20, 2016. A hearing has been scheduled for December 1, 2016 at 6:00 p.m. eastern time. The hearing will occur at the Mount Vernon Fire Station Training Room, located at 311 College Avenue, Mount Vernon, Indiana 47620. If no timely request for a public hearing is received by November 20, 2016, the hearing will be cancelled. Interested parties can check the online IDEM calendar at <http://www.in.gov/activecalendar/EventList.aspx> or contact Mark Derf at the contact information listed below to see if the hearing has been cancelled. Interested parties may present oral or written comments at the public hearing, if held.

Comments and supporting documentation, or a request for a public hearing must be sent in writing to Mark Derf via the information provided below. Please refer to Commissioner's Order 2016-03 in all correspondence.

Mark Derf
Indiana Department of Environmental Management
Office of Air Quality
100 North Senate Avenue
Mail Code 61-50 IGCN 1003
Indianapolis, Indiana 46204

Phone: (317) 233-5682
Fax: (317) 233-2342
E-mail:MDERF@idem.IN.gov.

Individuals requiring reasonable accommodations for participation in this event should contact the Indiana Department of Environmental Management, Americans with Disabilities Act coordinator at:

Attn: ADA Coordinator
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

or call (317) 233-1785 (V). Speech and hearing impaired callers may contact IDEM via the Indiana Relay Service (711) or (800) 743-3333. Please provide a minimum of 72 hours notification.

A copy of the Commissioner's Order is available to any person upon request and is available for public inspection at the following locations:

Indiana Department of Environmental Management
Office of Air Quality
Indiana Government Center-North
100 North Senate Avenue
10th Floor
Indianapolis, Indiana 46204

and

Indiana Department of Environmental Management
Southwest Regional Office
1120 North Vincennes Avenue
Petersburg, Indiana 47567

and

Alexandrian Public Library
115 West Fifth Street
Mount Vernon, Indiana 47620

The Commissioner's Order is also available on the IDEM website at:
<http://www.in.gov/idem/6974.htm>.

For additional information, please contact Mark Derf at the contact information provided above.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
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Carol S. Comer
Commissioner

October 21, 2016

CERTIFICATE OF PUBLICATION

This is to certify that the Indiana Department of Environmental Management (IDEM) notice of public comment period and opportunity for a Public Hearing regarding the following:

- **Commissioner's Order #2016-03 for SABIC Innovative Plastics Mt. Vernon, LLC**

was published on IDEM's web site on October 21, 2016. It is expected that it will remain posted on the site until at least December 1, 2016.

The document in full was also made available the same day online at the following web address:

<http://www.in.gov/idem/6974.htm>

Web publication of the notice was at the request of Scott Deloney, Branch Chief, Programs Branch, Office of Air Quality, IDEM.

By:

Mike Finklestein
IDEM Webmaster

Attachments:

Copy of web page as published.

http://www.in.gov/ide/6974.htm

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Governor Mike Pence

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Commissioner's Orders

A Commissioner's Order is a permanent enforceable order specifically authorized by an air rule as an alternative to a rule requirement. Once issued, a Commissioner's Order becomes a condition in an air permit. In most cases, a Commissioner's Order will be submitted to U.S. EPA for approval as an amendment to Indiana's state implementation plan for the Clean Air Act.

- Commissioner's Order #2016-02 for Clifty Creek Generating Station of Indiana:
 - [Notice and Order of the Commissioner of the Department of Environmental Management IPDF](#)
 - [Legal Notice of Public Hearing IPDF](#)
- Commissioner's Order #2016-01 for A.B. Brown Generating Station of Indiana:
 - [Notice and Order of the Commissioner of the Department of Environmental Management IPDF](#)
 - [Legal Notice of Public Hearing IPDF](#)
- Commissioner's Order #2015-01 for Abengoa Bioenergy of Indiana:
 - [Notice and Order of the Commissioner of the Department of Environmental Management IPDF](#)
 - [Legal Notice of Public Hearing IPDF](#)
- Commissioner's Order #2014-01 for Jeffboat LLC:
 - [Notice and Order of the Commissioner of the Department of Environmental Management IPDF](#)
 - [Legal Notice of Public Hearing IPDF](#)
- Commissioner's Order #2009-OAQ-01:
 - [Notice of Commissioner's Order IPDF](#)
- Commissioner's Order #2008-02 and Variance, Indianapolis Power & Light - Harding Street Generating Station:
 - [Notice, Order, and Variance of the Commissioner of the Department of Environmental Management IPDF](#)
 - [IPL Legal Notice of Comment Period and Opportunity to Request a Public Hearing IDOC](#)
 - [Notice of Variance Decision IPDF](#)
- Commissioner's Order #2008-01 and Variance, ALCOA Power Generating, Inc. -

Online Services

- Acronyms List
- Electronic Permitting / Regulatory Services Portal
- Enforcement Database
- Forms.IN.gov
- Impaired Waters (e303d)
- Online Air Permit Search
- Online Invoice Payment Options
- Real-Time Monitoring
- Safe Drinking Water Information Search
- Virtual File Cabinet
- Wastewater Certification Renewal

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IDEM Public Notices

Be aware of what's going on in your community

Top FAQs I Want To...

1. Need Help? Have problems? Who do I call? What Agency?
2. Where can I recycle?
3. How do I file an IDEM complaint?
4. How do I request or where can I find public records/files?
5. Where can I find information

Environmental Education
Hoosier Riverwatch
Indiana Beach Program
Land Quality
Partners for Pollution Prevention
Pollution Prevention
Recycle Indiana
Storm Water Permitting
Waste Tire Program
Water Quality

10:35 AM 10/21/2016

Browser window showing the IN.gov website. The address bar displays <https://www.in.gov/ideem/6393.htm>. The page title is "IDEM: Public Notices: Sout...".

The website header includes the IN.gov logo and navigation tabs: BUSINESS & AGRICULTURE, RESIDENTS, GOVERNMENT, EDUCATION, TAXES & FINANCE, VISITING & PLAYING, and FAMILY & HEALTH. The Governor Mike Pence name is visible in the top right corner.

The main content area displays "Environmental Publications" and "Nonrule Policies". A "Find Out Where to Recycle" graphic is present.

A "Date and Time" dialog box is open, showing the date "Friday, October 21, 2016" and time "10:38:33 AM". It includes options to "Change date and time..." and "Change time zone...".

The main content area lists various public notices, including:

- FIC America Corporation**: New Source Review and Minor Source Operating Permit (MSOP) [PDF]. Dates: 10/11/2016 - 11/10/2016. Yes. Permit Number: M083-37373-00045.
- Bicknell Municipal Water-Water Treatment Plant Facility**: Water Treatment For Drinking Water [PDF]. Dates: 09/27/2016 - 10/27/2016. Yes. Project Manager: Kristine Taylor. Permit Number: 11591.
- Lawrence**: No current public notices.
- Martin**: Naval Support Activity Crane. RCRA Corrective Action Notice of Remediation Decision [PDF]. Dates: 09/30/2016 - 11/14/2016. Yes. Project Manager: Doug Griffin. Permit Number: IN5170023498.
- NSWC Crane Division**: NPDES Major Final Modification [PDF]. Dates: 10/21/2016 - 11/08/2016. No. Project Manager: Jennifer Carlino. Permit Number: IN0021539.
- Orange**: No current public notices.
- Perry**: No current public notices.
- Pike**: Kerns Excavating - AML Site 2083, Sugar Ridge Area 2. NPDES 15-7 "Termination" General Permit [PDF]. Dates: 10/14/2016 - 11/01/2016. No. Project Manager: Sheri Jordan. Permit Number: ING040281.
- SR 364 over Patoka River**: 401 Water Quality Certification Public Notice [PDF]. Dates: 09/12/2016 - 10/03/2016. Yes. Project Manager: Samantha Groce. Applicant Company: INDOT. Permit Number: 2016-511-63-SKG-A.
- Posay**: Commissioner's Order #2016-03 for SABIC Innovative Plastics Mt. Vernon, LLC. Legal Notice and Opportunity for Public Hearing [PDF]. Dates: 10/21/2016 - 11/20/2016. Yes. Project Manager: Mark Derf. Commissioner's Order 2016-03 is available on the IDEM Commissioner's Orders page.
- Matheson Tri-Gas Inc (formerly Air Liquide Industrial US LP)**: NPDES Final Renewal [PDF]. Dates: 10/21/2016 - 11/08/2016. No. Project Manager: Jennifer Carlino. Permit Number: IN0001970.
- GAF Building Materials Manufacturing Corp.**: NPDES Final Renewal [PDF]. Dates: 09/23/2016 - 10/11/2016. No. Project Manager: Devery Deboy. Permit Number: IN0051667.
- Spencer**: No current public notices.
- Vanderburgh**: DSM Engineering Plastics. Renewal of a Federally Enforceable State. Dates: 10/08/2016 - Yes. Permit Number: F163-37397-.

Attachment D

SABIC Innovative Plastics:

Modeling Summary

Posey County

SABIC Innovative Plastics Mt. Vernon, LLC – Commissioner’s Order 2016-03 Modeling

Background

SABIC Innovative Plastics Mt. Vernon, LLC (SABIC) is retrofitting their facility with a cogeneration (CoGen) plant that will use natural gas to create a majority of the steam for the site. Currently, SABIC’s coal-fired boilers provide approximately 40 percent of the site’s steam. The United States Environmental Protection Agency (U.S. EPA) recently issued a new boiler Maximum Achievable Control Technology (MACT) standard for industrial, commercial, and institutional boilers. SABIC is building their CoGen plant to address those standards. Significant sulfur dioxide (SO₂) emission reductions are a byproduct of this project as several coal-fired boilers will be shut down once the project becomes fully operational by January of 2017.

SABIC was classified as a Data Requirements Rule (DRR) source based on their actual 2014 SO₂ emissions of 4,030 tons exceeding the DRR threshold of 2,000 tons of SO₂. While the CoGen project helped SABIC realize significant SO₂ emission reductions, modeling was still required to address the DRR.

Initial modeling, using actual emissions data from 2014, showed higher modeled 1-hour SO₂ concentrations. However, after discussions with SABIC, it was decided they would request a Commissioner’s Order to establish SO₂ emission limits that would be federally enforceable and permanent. A worst case modeling scenario was evaluated based on their manufacturing process explained below.

Manufacturing Process

SABIC has 16 carbon monoxide (CO) reactors, or generators, that are used to manufacture carbon monoxide. The CO generators are located in the phosgene process area. CO is generated by combusting coke (a petroleum-based material that consists mostly of carbon, with minor amounts of sulfur as an impurity) in the CO generators under low-oxygen conditions. Because the coke contains low levels of sulfur, the raw CO from the CO generators contains sulfur-containing impurities (carbonyl sulfide, carbon disulfide, and hydrogen sulfide). These impurities need to be removed prior to the next step in the manufacturing process, where CO is combined with chlorine to make phosgene.

The raw CO is purified by passing it through one of several carbon adsorbers. At the outlet of the adsorber, a gas chromatograph measures the concentrations of the sulfur-containing compounds in the purified CO. Once a certain level of sulfur-containing compounds is detected,

the flow of raw CO is switched to another adsorber and the spent adsorber is regenerated by desorbing the sulfur-containing compounds with heated nitrogen.

The adsorbed regeneration gas (primarily nitrogen, with low levels of sulfur-containing compounds) is then vented to either the COS Vent Oxidizer or the COS Flare. The regeneration gas passes through a valve that directs the flow to either the COS Vent Oxidizer or the COS Flare, but cannot direct the flow to both simultaneously. The COS Vent Oxidizer is the primary control device; the COS Flare serves as a back-up to the COS Vent Oxidizer or during safety interlock of the system. Both the COS Vent Oxidizer and COS Flare eliminate the sulfur-containing compounds in the regeneration gas by thermal combustion.

Modeled Limits

Since SO₂ emissions can be routed to either the COS Vent Oxidizer or COS Flare, modeling was performed for both scenarios to determine the worst-case dispersion. The meteorological and background time period examined was 2013-2015. All ancillary SO₂ emitting sources (i.e. generators and fire pumps) at SABIC were included in both modeling scenarios. Temporally varying seasonal SO₂ background concentrations as well as the surrounding SO₂ source inventories were included in the modeling to establish SABIC's emission limits.

The COS Vent Oxidizer was the worst case modeling scenario and was limited to 415 lb of SO₂/hr which equates to a 269.21 lbs of SO₂/hr over a 24-hour averaging period. The COS Vent Oxidizer represented 93 percent of SABIC's total SO₂ modeled contributions. The other 7 percent of the modeled contributions were from SABIC's ancillary units which also have SO₂ limits. Table 1 shows the modeled results used to establish SABIC's SO₂ emission limits.

Table 1
SABIC 1-Hour SO₂ Modeling Results

Modeled Source	Modeled Concentration Including Seasonal Hourly Background (µg/m³)	1-Hour SO₂ NAAQS (µg/m³)	Facility Models Attainment
SABIC COS Flare	135.4	196.2	Yes
SABIC COS Vent Oxidizer	192.9	196.2	Yes

The modeling showed attainment of the 1-hour SO₂ standard with the emission limits listed in SABIC's Commissioner's Order. All other modeling parameters were maintained from the DRR modeling.

