



093-48940 - 00002
AI: 11776

Heidelberg Materials

Heidelberg Materials North America
CEM/Midwest
200 Mill Creek Rd
Mitchell, IN, 47116
Phone (812) 849-2151

April 8, 2025

IDEM Air Permits Administration
ATTN: Incoming Application
100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, IN 46204-2251

Received ^{RFJ}
State of Indiana
APR 23 2025
Dept of Environmental Mgmt
Office of Air Quality

**RE: Title V Operating Permit - Administrative Amendment Application
Heidelberg Materials US Cement, LLC. - Mitchell, IN**

To whom it may concern:

This letter constitutes an administrative amendment (AA) application to correct errors and/or remove mistakenly included references in the Title V permit for Heidelberg Materials US Cement, LLC's (Heidelberg's) Portland cement plant in Mitchell, Indiana (Mitchell Plant). Heidelberg currently operates the Mitchell Plant under Part 70 (Title V) Renewal No. T093-45783-00002 Issued March 8, 2023 by the Indiana Department of Environmental Management (IDEM). The most recent change to the operating permit was issued by IDEM as a Significant Permit Modification on December 30, 2024 as No. 093-47798-00002 (SPM 47798).

This letter provides pertinent background information related to this requested change, including the basis for this change as an Administrative Amendment. Air permit application forms are included in Attachment A to this letter.

Revision Description

Heidelberg requests that IDEM remove errant Conditions D.8.7, D.8.8, revise Conditions D.8.15(e) and D.8.12, and delete "(and consent decree No. 5:19-cv-05688-JFL for Kiln #4)" from Conditions E.1.1(a) and E.5.1(a) from the Title V permit.

The requested revisions are consistent with Consent Decree No. 5:19-cv-05688-JFL ("the CD") entered into between U.S. EPA/states/state agencies and Heidelberg, including the State of Indiana, to enforce Clean Air Act provisions relating to NO_x and SO₂ limits. To address alleged noncompliance, the CD included requirements for existing kilns at certain of Heidelberg's

cement manufacturing operations throughout the United States. Because Heidelberg had already decided it was going to continue to operate its existing kilns at its other facilities, the CD specified the type of technology that must be installed on each existing kiln and the monitoring and record keeping for each to ensure compliance with NO_x and SO₂ limits. However, the settlement reached for Kilns Nos. 1, 2, and 3 at the Mitchell Plant, included the following option: (1) "Mitchell Option A" shutdown existing Kilns Nos. 1, 2, and 3 in accordance with the compliance schedule included in the CD (since Heidelberg wanted to continue to manufacture cement at the Mitchell Plant, the existing kilns would be replaced with a new kiln which would trigger the existing New Source Performance Standards for Portland Cement Plants (NSPS) requiring the best demonstrated emission control technologies for NO_x and SO₂); or (2) "Mitchell Option B" continue operating Kilns Nos. 1, 2, and 3 with modified operational, reporting and record keeping requirements as set forth in the CD to ensure compliance with NO_x and SO₂ limits.

Heidelberg submitted an application for construction approval for a new Kiln No. 4 at the Mitchell Facility to IDEM. IDEM issued the Significant Source and Permit Modifications for the new Kiln No. 4 on June 27, 2019 and July 17, 2019, respectively, which require Kiln No. 4 to comply with the NSPS for NO_x and SO₂, among other pollutants. The CA was signed and became effective November 19, 2020. Heidelberg opted for "Mitchell Option A" and retired Kiln No. 1 on April 12, 2023, Kiln No. 2 on April 11, 2023, and Kiln No. 3 on April 10, 2023. Kiln No. 4 commenced operation in April 2023 as well.

CD Tables 2 and 3 addressing NO_x and SO₂ requirements for all of Heidelberg's kilns/facilities subject to the enforcement action tracks how each kiln subject to the enforcement action (as defined in Section III of the CD, including for the Mitchell Plant only Kilns 1, 2 and 3) will come into compliance to ensure NO_x and SO₂ limits are met. The Mitchell Plant's Compliance Options A and B were included in the tables to track how Heidelberg might comply, either by shutting down existing Kilns Nos. 1, 2, and 3 (in which case any new kiln would be subject to existing NSPS regulations at 40 CFR Part 60, Subpart F), or meeting the new CD requirements for Kilns Nos. 1, 2, and 3. Pursuant to Paragraph 14 and 22 if "Mitchell Option A" is pursued the only CD requirements are shutting down Kiln Nos. 1, 2, and 3 in accordance with the triggering events schedule included in these conditions. Therefore, since Heidelberg opted to retire Mitchell Kiln Nos. 1, 2, and 3 and permitted, constructed and operates a new Kiln No. 4 at the Mitchell Plant that is subject to the NSPS best demonstrated emission control technologies for NO_x and SO₂, there are no CD conditions that needed to be incorporated into the Mitchell Plant's Title V Permit.

In addition to the removal of Conditions D.8.7 and D.8.8, Heidelberg also requests that the following conditions be updated as shown:

- Condition D.8.12

In order to ensure compliance with Condition D.8.1, the low-NOx burners and selective non-catalytic reduction (SNCR) shall be in operation and control NOx emissions from the Kiln #4 system at all times that the Kiln #4 system is in operation. ~~The term "SNCR shall be in operation and control NOx emissions from the Kiln #4 system at all times that the Kiln #4 system is in operation" has the same meaning as the term "Continuously Operate" or "Continuous Operation" used in Condition D.8.7(b).~~

- Condition D.8.15(e)

*(e) Pursuant to 326 IAC 2-7-10.5(b) ~~and as required by consent decree No. 5:19-cv-05688-JFL,~~
~~to demonstrate compliance with Condition D.8.7 for NOx and Condition D.8.8 for SO2~~
~~when~~
~~the CEMS are inoperable or otherwise not measuring emissions from Kiln #4, the~~
Permittee
~~shall apply the missing data substitution procedures used by the IDEM or in 40 CFR 75, Subpart D.~~*

Heidelberg also requests that references to "(and consent decree No. 5:19-cv-05688-JFL for Kiln #4)" be removed from Conditions E.1.1(a) and E.5.1(a) of the Title V permit.

326 IAC 2-7-11 – Administrative Amendment

Pursuant to 326 IAC 2-7-11, Heidelberg is applying for an administrative amendment to the Title V permit for the Mitchell Plant. This change may be addressed as an administrative amendment according to 326 IAC 2-7-11(a)(7) because it revises /corrects descriptive information that does not trigger new applicable requirements.

Summary

As described above, Heidelberg requests the removal of the above-referenced provisions from the Title V permit for the Mitchell plant. The appropriate application forms are included in Attachment A to facilitate processing of this letter.

If you have any questions or need additional information regarding this administrative amendment application, please contact me at (812) 849-7018 or Emily Stewart at (317) 451-8102.

Sincerely,

HEIDELBERG MATERIALS US CEMENT, LLC

A handwritten signature in black ink, appearing to read "Tracy Crowther". The signature is fluid and cursive, with the first name "Tracy" written in a larger, more prominent script than the last name "Crowther".

Tracy Crowther
Plant Manager
Mitchell Plant

cc: Samantha Smith – Mitchell Plant
Adam Swerchcek – Heidelberg
Kathryn Jost - Heidelberg
Emily Stewart – Trinity



AIR PERMIT APPLICATION COVER SHEET
 State Form 50030 (R4/1-10)
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM – Office of Air Quality – Permits Branch
 100 N. Senate Avenue, MC 61-53 Room 1003
 Indianapolis, IN 46204-2251
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-451-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
www.IN.gov/idem

NOTES:

- The purpose of this cover sheet is to obtain the core information needed to process the air permit application. This cover sheet is required for all air permit applications submitted to IDEM, OAQ. Place this cover sheet on top of all subsequent forms and attachments that encompass your air permit application packet.
- Submit the completed air permit application packet, including all forms and attachments, to IDEM Air Permits Administration using the address in the upper right hand corner of this page.
- IDEM will send a bill to collect the filing fee and any other applicable fees.
- Detailed instructions for this form are available on the Air Permit Application Forms website.

FOR OFFICE USE ONLY	
PERMIT NUMBER:	AZ 11776
	093 - 48940 - 00002
DATE APPLICATION WAS RECEIVED:	
Received State of Indiana	
APR 28 2025 Hc	
Dept of Environmental Mgmt Office of Air Quality	

1. Tax ID Number: _____

PART A: Purpose of Application

Part A identifies the purpose of this air permit application. For the purposes of this form, the term "source" refers to the plant site as a whole and NOT to individual emissions units.

2. Source / Company Name: Heidelberg Materials US Cement LLC

3. Plant ID: 093 - 0002

4. Billing Address: 180 North Meridian Road

City: Mitchell State: IN ZIP Code: 47446 -

5. Permit Level: Exemption Registration SSOA MSOP FESOP TVOP PBR

6. Application Summary: Check all that apply. Multiple permit numbers may be assigned as needed based on the choices selected below.

<input type="checkbox"/> Initial Permit	<input type="checkbox"/> Renewal of Operating Permit	<input type="checkbox"/> Asphalt General Permit
<input type="checkbox"/> Review Request	<input type="checkbox"/> Revocation of Operating Permit	<input type="checkbox"/> Alternate Emission Factor Request
<input type="checkbox"/> Interim Approval	<input type="checkbox"/> Relocation of Portable Source	<input type="checkbox"/> Acid Deposition (Phase II)
<input type="checkbox"/> Site Closure	<input type="checkbox"/> Emission Reduction Credit Registry	

Transition (between permit levels) From: _____ To: _____

Administrative Amendment: Company Name Change Change of Responsible Official
 Correction to Non-Technical Information Notice Only Change
 Other (specify): _____

Modification: New Emission Unit or Control Device Modified Emission Unit or Control Device
 New Applicable Permit Requirement Change to Applicability of a Permit Requirement
 Prevention of Significant Deterioration Emission Offset MACT Preconstruction Review
 Minor Source Modification Significant Source Modification
 Minor Permit Modification Significant Permit Modification
 Other (specify): _____

7. Is this an application for an initial construction and/or operating permit for a "Greenfield" Source? Yes No

8. Is this an application for construction of a new emissions unit at an Existing Source? Yes No

PART B: Pre-Application Meeting

Part B specifies whether a meeting was held or is being requested to discuss the permit application.

9. Was a meeting held between the company and IDEM prior to submitting this application to discuss the details of the project?

No Yes: Date: _____

10. Would you like to schedule a meeting with IDEM management and your permit writer to discuss the details of this project?

No Yes: Proposed Date for Meeting: _____

PART C: Confidential Business Information

Part C identifies permit applications that require special care to ensure that confidential business information is kept separate from the public file.

Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in the Indiana Administrative Code (IAC). To ensure that your information remains confidential, refer to the IDEM, OAQ information regarding submittal of confidential business information. For more information on confidentiality for certain types of business information, please review IDEM's Nonrule Policy Document Air-031-NPD regarding Emission Data.

11. Is any of the information contained within this application being claimed as **Confidential Business Information**?

No Yes

PART D: Certification Of Truth, Accuracy, and Completeness


Part D is the official certification that the information contained within the air permit application packet is truthful, accurate, and complete. Any air permit application packet that we receive without a signed certification will be deemed incomplete and may result in denial of the permit.

For a Part 70 Operating Permit (TVOP) or a Source Specific Operating Agreement (SSOA), a "responsible official" as defined in 326 IAC 2-7-1(34) must certify the air permit application. For all other applicants, this person is an "authorized individual" as defined in 326 IAC 2-1.1-1(1).

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate, and complete.

Tracy Crowther
Name (typed)

Plant Manager
Title


Signature

4/8/2025
Date



OAQ GENERAL SOURCE DATA APPLICATION
GSD-01: Basic Source Level Information
 State Form 50640 (Rev. 11-2014)
 INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM - Office of Air Quality - Permits Branch
 100 N. Senate Avenue, MC 61-53 Room 1003
 Indianapolis, IN 46204-2251
 Telephone: (317) 233-0178 or
 Toll Free: 1-800-461-6027 x30178 (within Indiana)
 Facsimile Number: (317) 232-6749
www.IN.gov/idem

APR 28 2025 HC
 Dept of Environmental Mgmt
 Office of Air Quality

NOTES:

- The purpose of GSD-01 is to provide essential information about the entire source of air pollutant emissions. GSD-01 is a required form.
- Detailed instructions for this form are available on the Air Permit Application Forms website.
- All information submitted to IDEM will be made available to the public unless it is submitted under a claim of confidentiality. Claims of confidentiality must be made at the time the information is submitted to IDEM, and must follow the requirements set out in 32B IAC 17.1-4-1. Failure to follow these requirements exactly will result in your information becoming a public record, available for public inspection.

PART A: Source / Company Location Information

1. Source / Company Name: Heidelberg Materials US Cement LLC		2. Plant ID: 093 - 0002	
3. Location Address: 180 North Meridian Road			
City: Mitchell	State: IN	ZIP Code: 47446 -	
4. County Name: Lawrence		5. Township Name: Marion	
6. Geographic Coordinates:			
Latitude: 38° 44' 08"		Longitude: 86° 27' 09"	
7. Universal Transverse Mercator Coordinates (if known):			
Zone: 18	Horizontal: 547.100	Vertical: 4287.400	
8. Adjacent States: Is the source located within 50 miles of an adjacent state?			
<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes - Indicate Adjacent State(s): <input type="checkbox"/> Illinois (IL) <input type="checkbox"/> Michigan (MI) <input type="checkbox"/> Ohio (OH) <input checked="" type="checkbox"/> Kentucky (KY)			
9. Attainment Area Designation: Is the source located within a non-attainment area for any of the criteria air pollutants?			
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes - Indicate Nonattainment Pollutant(s): <input type="checkbox"/> CO <input type="checkbox"/> Pb <input type="checkbox"/> NO _x <input type="checkbox"/> O ₃ <input type="checkbox"/> PM <input type="checkbox"/> PM ₁₀ <input type="checkbox"/> PM _{2.5} <input type="checkbox"/> SO ₂			
10. Portable / Stationary: Is this a portable or stationary source?			
		<input type="checkbox"/> Portable	<input checked="" type="checkbox"/> Stationary

PART B: Source Summary

11. Company Internet Address (optional):	
12. Company Name History: Has this source operated under any other name(s)?	
<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes - Provide information regarding past company names in Part I, Company Name History.	
13. Portable Source Location History: Will the location of the portable source be changing in the near future?	
<input checked="" type="checkbox"/> Not Applicable <input type="checkbox"/> No <input type="checkbox"/> Yes - Complete Part J, Portable Source Location History, and Part K, Request to Change Location of Portable Source.	
14. Existing Approvals: Have any exemptions, registrations, or permits been issued to this source?	
<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes - List these permits and their corresponding emissions units in Part M, Existing Approvals.	
15. Unpermitted Emissions Units: Does this source have any unpermitted emissions units?	
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes - List all unpermitted emissions units in Part N, Unpermitted Emissions Units.	
16. New Source Review: Is this source proposing to construct or modify any emissions units?	
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes - List all proposed new construction in Part O, New or Modified Emissions Units.	
17. Risk Management Plan: Has this source submitted a Risk Management Plan?	
<input checked="" type="checkbox"/> Not Required <input type="checkbox"/> No <input type="checkbox"/> Yes → Date submitted: _____ EPA Facility Identifier: _____	

PART C: Source Contact Information

IDEM will send the original, signed permit decision to the person identified in this section. This person MUST be an employee of the permitted source.

18. Name of Source Contact Person: Kathryn Jost		
19. Title (optional): Senior Environmental Manager		
20. Mailing Address: 7660 Imperial Way		
City: Allentown	State: PA	ZIP Code: 18195 --
21. Electronic Mail Address (optional): kathryn.jost@heidelbergmaterials.com		
22. Telephone Number: (636) 931 - 8546	23. Facsimile Number (optional): () -	

PART D: Authorized Individual/Responsible Official Information

IDEM will send a copy of the permit decision to the person indicated in this section, if the Authorized Individual or Responsible Official is different from the Source Contact specified in Part C.

24. Name of Authorized Individual or Responsible Official: Tracy Crowther		
25. Title: Plant Manager		
26. Mailing Address: 200 Mill Creek Road		
City: Mitchell	State: IN	ZIP Code: 47446 --
27. Telephone Number: (812) 849 - 7018	28. Facsimile Number (optional): () -	
29. Request to Change the Authorized Individual or Responsible Official: Is the source officially requesting to change the person designated as the Authorized Individual or Responsible Official in the official documents issued by IDEM, OAQ? The permit may list the title of the Authorized Individual or Responsible Official in lieu of a specific name. <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes - Change Responsible Official to:		

PART E: Owner Information

30. Company Name of Owner: Heidelberg Materials US, Inc.		
31. Name of Owner Contact Person: Adam Swercheck		
32. Mailing Address: 7660 Imperial Way		
City: Allentown	State: PA	ZIP Code: 18195 - 1040
33. Telephone Number: (610) 295 - 1906	34. Facsimile Number (optional): () -	
34. Operator: Does the "Owner" company also operate the source to which this application applies? <input type="checkbox"/> No - Proceed to Part F below. <input checked="" type="checkbox"/> Yes - Enter "SAME AS OWNER" on line 35 and proceed to Part G below.		

PART F: Operator Information

35. Company Name of Operator: Same As Owner		
36. Name of Operator Contact Person:		
37. Mailing Address:		
City:	State:	ZIP Code: -
38. Telephone Number: () -	39. Facsimile Number (optional): () -	

PART G: Agent Information

40. **Company Name of Agent:** Trinity Consultants

41. **Type of Agent:** Environmental Consultant Attorney Other (specify):

42. **Name of Agent Contact Person:** Emily Stewart

43. **Mailing Address:** 8900 Keystone Crossing, Suite 1070
 City: Indianapolis State: IN ZIP Code: 46240 -

44. **Electronic Mail Address (optional):** estewart@trinityconsultants.com

45. **Telephone Number:** (317) 451 - 8102 46. **Facsimile Number (optional):** () -

47. **Request for Follow-up:** Does the "Agent" wish to receive a copy of the preliminary findings during the public notice period (if applicable) and a copy of the final determination? No Yes

PART H: Local Library Information

48. **Date application packet was filed with the local library:** Within 10 days of submittal (if required)

49. **Name of Library:** Mitchell Community Public Library

50. **Name of Librarian (optional):**

51. **Mailing Address:** 804 Main Street
 City: Mitchell State: IN ZIP Code: 47446 -

52. **Internet Address (optional):** www.mitchell.lib.in.us

53. **Electronic Mail Address (optional):**

54. **Telephone Number:** (812) 849 - 2412 55. **Facsimile Number (optional):** () -

PART I: Company Name History (if applicable)

Complete this section only if the source has previously operated under a legal name that is different from the name listed above in Section A.

56. Legal Name of Company	57. Dates of Use
Lehigh Cement Company	2001 to 2010
Lehigh Portland Cement Company	1902 to 2001
Lehigh Cement Company LLC	2010 to 2022
Heidelberg Materials US Cement LLC	2023 to Current
	to
	to
	to
	to
	to
	to

58. **Company Name Change Request:** Is the source officially requesting to change the legal name that will be printed on all official documents issued by IDEM, OAQ?
 No Yes - Change Company Name to:

PART J: Portable Source Location History (if applicable)

Complete this section only if the source is portable and the location has changed since the previous permit was issued. The current location of the source should be listed in Section A.

59. Plant ID	60. Location of the Portable Source	61. Dates at this Location
-	N/A	to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to
-		to

PART K: Request to Change Location of Portable Source (if applicable)

Complete this section to request a change of location for a portable source.

62. Current Location:

Address: N/A

City: _____ State: _____ ZIP Code: -

County Name: _____

63. New Location:

Address: N/A

City: _____ State: _____ ZIP Code: -

County Name: _____

PART L: Source Process Description			
Complete this section to summarize the main processes at the source.			
64. Process Description	65. Products	66. SIC Code	67. NAICS Code
Portland Cement Manufacturing Plant	Gray Portland Cement and Masonry Products	3241	32731

PART M: Existing Approvals (if applicable)		
Complete this section to summarize the approvals issued to the source since issuance of the main operating permit.		
68. Permit ID	69. Emissions Unit IDs	70. Expiration Date
45783	Title V Renewal	3/08/2028
47782	Significant Source Modification	

PART N: Unpermitted Emissions Units (if applicable)				
Complete this section only if the source has emission units that are not listed in any permit issued by IDEM, OAQ.				
71. Emissions Unit ID	72. Type of Emissions Unit	73. Actual Dates		
		Began Construction	Completed Construction	Began Operation
	N/A			

PART O: New or Modified Emissions Units (if applicable)						
Complete this section only if the source is proposing to add new emission units or modify existing emission units.						
74. Emissions Unit ID	75. NEW	76. MOD	77. Type of Emissions Unit	78. Estimated Dates		
				Begin Construction	Complete Construction	Begin Operation
			N/A			

Heidelberg Materials
200 Mill Creek Rd.
Mitchell, IN 47446



Retail

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MITCHELL, IN 47446
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Dept of Environmental Mgmt
Office of Air Quality

IDEM - Office of Air Quality - Permits Branch
100 N. Senate Ave., MC 61-53 Room 1003
Indianapolis, IN 46204-2251