

Mr. Kenneth Hirsig
Acting Chief Engineer
Newport Chemical Depot
P.O. Box 160
Newport, Indiana 47966-0160

Re: 165-12677
Second Minor Revision to
FESOP 165-5470-00003

Dear Mr. Hirsig:

Newport Chemical Depot was issued a FESOP (F165-5470-00003) on December 11, 1996 for the operations at the Newport Chemical Depot (NECD). A letter requesting changes to this permit, relating to the operation of various equipment to be installed at the existing source temporarily, was received on September 18, 2000. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of adding the following:

- (a) the following equipment to be temporarily installed and operated at the existing source:
 - (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches; and
 - (H) emergency lights.
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons.
 - (3) heaters.
 - (4) smoke bombs.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Pan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Duane Van Laningham or extension (3-6878), or dial (973) 575-2555, extension 3248.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
SCP/EVP

cc: File - Vermillion County
U.S. EPA, Region V
Vermillion County Health Department
Air Compliance Section Inspector - Eric Courtright
Compliance Data Section - Jerri Curless
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

**Newport Chemical Depot (NECD)
Indiana State Road 63
Newport, Indiana 47966-0121**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F165-5470-00003	
Original issued by Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: December 11, 1996
Exemption: 165-8390	Issuance Date: July 1997
First Significant Revision: 165-9701	Issuance Date: October 7, 1998
First Minor Permit Revision: 165-10289	Issuance Date: April 23, 1999
Second Significant Permit Revision: 165-9659	Issuance Date: December 3, 1999
Third Significant Permit Revision: 165-11541	Issuance Date: July 5, 2000
Second Minor Permit Revision: 165-12677	Pages Affected: 7b, 7c, 25m, 30d

Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:
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- (q) One (1) diesel storage tank, identified as Diesel Tank #1, with maximum storage capacity of 1,000 gallons; and
- (r) One (1) oxyacetylene and stick welding station, with maximum wire consumption rate of 2.01 pounds per hour.
- (s) Paved and unpaved roads and parking lots with public access;
- (t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process;
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment;
- (v) On-site fire and emergency response training approved by the department;
- (w) Emergency generators as follows:
 - (1) Gasoline generators not exceeding 110 horsepower;
 - (2) Diesel generators not exceeding 1600 horsepower;
 - (3) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower;
- (x) Stationary fire pumps;
- (y) Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 tons per year of a single HAP;
- (z) Any unit emitting greater than 1 pound per day but less than 12.5 pounds per day or 2.5 tons per year of any combination of HAPs.
- (aa) Two (2) propane fired hot water heaters, each rated at 0.179 million British thermal units per hour (mmBtu/hr);
- (bb) One (1) diesel generator and one (1) air compressor, each rated at 5 HP;
- (cc) one (1) diesel fired heater, rated at 0.406 million British thermal units (MMBtu) per hour, exhausting at one (1) stack, identified as S/V 87;
- (dd) four (4) portable kerosene heaters, each rated at 0.189, 0.189, 0.149 and 0.162 MMBtu/hr, respectively, and each exhausting at one (1) stack, identified as S/V 88, S/V 89, S/V 90 and S/V 91, respectively;
- (ee) three (3) propane heaters, each rated at 0.028, 0.095 and 0.095 MMBtu/hr, respectively,

and each exhausting at one (1) stack, identified as S/V 92, S/V 93 and S/V 94, respectively; and

- (ff) two (2) aboveground diesel fuel tanks, each with a storage capacity of 550 gallons and 300 gallons, respectively.

- (gg) the following equipment to be temporarily installed and operated at the existing source:
- (1) Internal combustion engines:
 - (A) Non-emergency generators;
 - (B) Pressure washers;
 - (C) Air compressors;
 - (D) Welders;
 - (E) Winches;
 - (F) Water pumps;
 - (G) Cutting torches; and
 - (H) Emergency lights.
 - (2) Above ground storage tanks with storage capacity less than 10,500 gallons.
 - (3) Heaters.
 - (4) Smoke bombs.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(gg) the following equipment to be temporarily installed and operated at the existing source:

- (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches; and
 - (H) emergency lights.
- (2) above ground storage tanks with storage capacity less than 10,500 gallons.
- (3) heaters.
- (4) smoke bombs.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.11.1 Particulate Matter (PM-10), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Nitrogen Oxides (NOx)

The emissions of each of PM-10, SO₂, VOC, CO and NOx due to the operation of the equipment covered in this section shall be limited to 5 tons per 12-month period, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.11.2 Record Keeping Requirements

To document compliance with Condition D.11.1, the Permittee shall maintain records at the source of the information necessary for determining the emissions of PM-10, SO₂, VOC, CO and NOx, due to the equipment brought to the source temporarily. The records shall contain a minimum of the following:

- (a) The hours of operation for each month for the equipment covered;
- (b) The rated capacity and type of fuel used for internal combustion (IC) engines and heaters, and storage capacity, dimensions and material type and throughput for storage tanks;
- (c) The monthly PM-10, SO₂, VOC, CO and NOx emissions, calculated by using emission factors for IC engines, storage tanks and heaters provided in the most recent edition of USEPA's AP-42 emission factor document.

D.11.3 Quarterly Reporting

A quarterly summary to document compliance with operation conditions D.11.1 and D.11.2 shall be submitted to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
 Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
 Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
 FESOP No.: F165-5470-00003
 Facility: Equipment brought to the source temporarily
 Parameter: PM-10, SO₂, VOC, CO and NO_x
 Limit: 5 tons per 12-month period, rolled on a monthly basis, for each pollutant.

YEAR: _____

Unit ID.	Month: _____			Month: _____			Month: _____		
	Emissions this month	Emissions prev. 11 months	12 mon. emission total	Emissions this month	Emissions prev. 11 months	12 mon. emission total	Emissions this month	Emissions prev. 11 months	12 mon. emission total
IC Engines									
Storage Tanks									
Heaters									

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____

Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	Newport Chemical Depot
Source Location:	Indiana State Road 63, Newport, Indiana, 47966-0160
County:	Vermillion
SIC Code:	9711
Operation Permit No.:	F165-5470-00003
Operation Permit Issuance Date:	December 11, 1996
Minor Revision No.:	165-12677-00003
Permit Reviewer:	Scott Pan/EVP

The Office of Air Management (OAM) has reviewed applications from Newport Chemical Depot relating to the operation of various equipment to be temporarily installed and operated at the existing source.

History

On September 18, 2000, Newport Chemical Depot submitted an application to the OAM requesting to operate various equipment to be temporarily installed and operated at the existing source. The reason Newport Chemical Depot requested for the approval of these equipment is mainly due to the fact that the source covers an area of over 7,000 acres and there is limited electrical power to most of the facility. Absence of electrical power in remote locations requires electrical power be generated at the point of use. Newport Chemical Depot has contractors that may require short-term usage of different equipment covered under this approval at different times. Newport Chemical Depot was issued a FESOP (F165-5470-00003) on December 11, 1996.

Existing Approvals

The source was issued a FESOP (F165-5470-00003) on December 11, 1996. The source has since received the following:

- (a) First Significant Revision to the existing FESOP source, 165-9701-00003, issued on October 7, 1998.
- (b) First Minor Revision to the existing FESOP source, 165-10289-00003, issued on April 23, 1999.
- (c) Second Significant Revision to the existing FESOP source, 165-9659-00003, issued on December 3, 1999.
- (d) Third Significant Revision to the existing FESOP source, 165-11541-00003, issued on July 5, 2000.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no facilities determined to be significant activities included in this review process.

Insignificant Activities

This application consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) the following equipment to be temporarily installed and operated at the existing source:
 - (1) internal combustion engines:
 - (A) non-emergency generators;
 - (B) pressure washers;
 - (C) air compressors;
 - (D) welders;
 - (E) winches;
 - (F) water pumps;
 - (G) cutting torches; and
 - (H) emergency lights.
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons.
 - (3) heaters.
 - (4) smoke bombs.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 18, 2000.

Potential To Emit of Revision and Justification

The potential to emit for any of the regulated pollutants (PM-10, VOC, SO₂, NO_x and CO), due to the equipment covered in the proposed modification, shall each be limited to 5 tons per 12-month period, rolled on monthly basis. Total allowable potential to emit for all regulated pollutants, after adding 5 tons/yr for each of the regulated pollutants, shall each be kept at less than 100 tons per year without adjusting the existing allowable potential to emit for the existing equipment. Therefore, pursuant to 326 IAC IAC 2-8-11, a Minor Revision to the FESOP is required.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the emission units at the source:

Process/facility	Limited PTE (tons/yr)					
	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Previously Permitted Units (Including both significant and insignificant activities)	29.93	30.02	46.54	68.42	71.39	13.99

Proposed Units	5.00	5.00	5.00	5.00	5.00	Negligible
Total Emissions after Revision	34.93	35.02	51.54	73.42	76.39	13.99

County Attainment Status

The source is located in Vermillion County.

Pollutant	Status
PM-10	Unclassifiable
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vermillion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

The storage tanks to be temporarily installed and operated at the existing source shall have individual storage capacities of less than 10,500 gallons (40 cubic meter (m³)). Therefore, the requirements of New Source Performance Standards, Subpart Kb (326 IAC 12 and 40 CFR 60.110b - 60.117b), do not apply.

There are no changes in Federal rule applicability from the original FESOP.

State Rule Applicability

326 IAC 2-8-4 (FESOP)

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the operations of the units covered under this approval are limited such that the potential to emit for each regulated pollutants (PM-10, VOC, SO₂, NO_x and CO) is limited at 5 tons per twelve (12)-month period, rolled on a monthly basis. The limit will assure source wide emissions be limited to less than 100 tons per year for each of the regulated pollutants. Therefore, the requirements of 326 IAC 2-7 will not apply.

To document compliance with the 5 tons per 12-month period emission limits, the source shall record and report the information necessary for determining the emissions of PM-10, SO₂, VOC, CO and NO_x, due to the equipment brought to the source temporarily. The information shall contain a minimum of the following:

- (a) The hours of operation for each month for the equipment covered;
- (b) The rated capacity and type of fuel used for internal combustion (IC) engines and heaters, and storage capacity, dimensions and material type and throughput for storage tanks;
- (c) The monthly PM-10, SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for IC engines, storage tanks and heaters provided in the most recent edition of USEPA's AP-42 emission factor document.

There are no applicable Article 8 rules due to the VOC emissions from the facilities covered under this approval. There are no changes in State rule applicability from the original FESOP.

Testing Requirements

The emissions from the units covered under this approval shall be determined using emission factors provided in the most recent edition of USEPA's AP-42 emission factor document. Therefore, stack tests are not required.

Compliance Monitoring

The units covered under this approval are considered insignificant activities, as defined in 326 IAC 2-7-1(21). Therefore, there are no changes in Compliance Monitoring from the original FESOP.

Proposed Changes to Federally Enforceable State Operating Permit

The following changes were made as the Second Minor Revision for this source (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

- (I) Section A.3 "Insignificant Activities" has been changed to list the equipment covered under this proposed minor FESOP revision, as follows:
- (gg) the following equipment to be temporarily installed and operated at the existing source:**
- (1) Internal combustion engines:**
 - (A) Non-emergency generators;**
 - (B) Pressure washers;**
 - (C) Air compressors;**
 - (D) Welders;**
 - (E) Winches;**
 - (F) Water pumps;**
 - (G) Cutting torches; and**
 - (H) Emergency lights.**
 - (2) Above ground storage tanks with storage capacity less than 10,500 gallons.**
 - (3) Heaters.**
 - (4) Smoke bombs.**
- (II) A new Section D.11 has been added as follows:

SECTION D.11 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (gg) the following equipment to be temporarily installed and operated at the existing source:**
- (1) internal combustion engines:**
 - (A) non-emergency generators;**
 - (B) pressure washers;**
 - (C) air compressors;**
 - (D) welders;**
 - (E) winches;**
 - (F) water pumps;**
 - (G) cutting torches; and**
 - (H) emergency lights.**
 - (2) above ground storage tanks with storage capacity less than 10,500 gallons.**
 - (3) heaters.**
 - (4) smoke bombs.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.11.1 Particulate Matter (PM-10), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Nitrogen Oxides (NO_x)

The potential to emit of each of PM-10, SO₂, VOC, CO and NO_x due to the operation of the equipment covered in this section shall be limited to 5 tons per 12-month period, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 do not apply.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.11.2 Equipment Operations

To document compliance with Condition D.11.1, the Permittee shall maintain records at the source of the information necessary to determine the emissions of PM-10, SO₂, VOC, CO and NO_x, due to the equipment brought to the source temporarily. The records shall contain a minimum of the following:

- (a) The hours of operation for each month for the equipment covered;
- (b) The rated capacity and type of fuel used for internal combustion (IC) engines and heaters, and storage capacity, dimensions and material type and throughput for storage tanks;
- (c) The monthly PM-10, SO₂, VOC, CO and NO_x emissions, calculated by using emission factors for IC engines, storage tanks and heaters provided in the most recent edition of USEPA's AP-42 emission factor document.

D.11.3 Quarterly Reporting

A quarterly summary to document compliance with operation conditions D.11.1 and D.11.2 shall be submitted to the address listed in Section C.19 - General Reporting Requirements, using the enclosed forms or their equivalent, within thirty (30) days after the end of the calendar quarter being reported.

- (III) The following quarterly report has been added:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Newport Chemical Depot
Source Address: Indiana State Road 63, Newport, Indiana 47966-0160
Mailing Address: P. O. Box 160, Newport, Indiana 47966-0160
FESOP No.: F165-5470-00003
Facility: Equipment brought in for short-term use
Parameter: PM-10, SO₂, VOC, CO and NO_x
Limit: 5 tons per 12-month period, rolled on a monthly basis, for each pollutant.

YEAR: _____

Unit ID.	Month: _____			Month: _____			Month: _____		
	Emissions this month	Emissions prev. 11 months	12 mon. emission total	Emissios this month	Emissions prev. 11 months	12 mon. emission total	Emissios this month	Emissions prev. 11 months	12 mon. emission total
IC Engines									
Storage Tanks									
Heaters									

- 9 No deviation occurred in this month.
- 9 Deviation/s occurred in this month.
 Deviation has been reported on: _____
 conditions D.11.1 and D.11.2
 Submitted by: _____
 Title/Position: _____
 Signature: _____
 Date: _____

Attach a signed certification to complete this report.

Conclusion

The revision of this National Defense - Chemical Stockpile Storage site shall be subject to the conditions of the attached proposed **Minor FESOP Revision No. 165-12677-00003**.