



Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

October 21, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: United Transportation / 089-14993-00469

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03



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**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
OFFICE OF AIR QUALITY**

**United Transportation Group
1150 East 145th Street
East Chicago, Indiana 46312**

The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; and denial of a permit renewal application. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

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

Operation Permit No.: F089-14993-00469	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 21, 2004 Expiration Date: October 21, 2009

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a railcar and truck tank cleaning facility.

Authorized Individual:	Owner, United Transportation Group
Source Address:	1150 East 145 th Street, East Chicago, IN 46312
Mailing Address:	P.O. Box 300, East Chicago, IN 46312
General Source Phone:	(219) 392-8100
SIC Code:	4785
County Location:	Lake
Source Location Status:	Nonattainment for ozone (1-hr and 8-hr standard) and SO ₂ Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD, Emission Offset Rules and Nonattainment NSR; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, with emissions uncontrolled and vented to building B which exhaust to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, with emissions uncontrolled and vented to building A which exhausts to vent A.
- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity 1 railcar per two hours, and emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-1.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Five (5) space heaters, and five (5) HVAC units.

- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

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 the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within thirty (30) days after issuance of this permit, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

And

Northwest Regional Office
Telephone Number: 1-888-209-8892, or 219-757-0265
Facsimile Number: 219-757-0267

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-

8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.23 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
 - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 26, 2001. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. The plan is included as Appendix B.

C.8 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that

- the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.
 - (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:
 - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan [or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan)] to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional

response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
 - (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
 - (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
 - (e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
 - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM,

OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Railcar and Tank truck Cleaning Operations

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, with emissions uncontrolled and vented to building B which exhaust to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, with emissions uncontrolled and vented to building A which exhausts to vent A.

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

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

D.1.1 FESOP/Emission Offset Minor Limit/Nonattainment NSR Minor Limit [326 IAC 2-8][326 IAC 2-3][326 IAC 8-1-6][326 IAC 2-1.1-5]

- (a) The total number of tank trucks, containing volatile organic compounds (VOC), cleaned at the source shall not exceed 2960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned.
- (b) The source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with these limits is equivalent to VOC emissions less than 20.12 tons per twelve consecutive month period. These limits, in conjunction with the limits in Condition D.2.1, are structured such that the total VOC emissions from the entire source shall be less than 25 tons per year.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment NSR) and 326 IAC 8-1-6 (BACT) not applicable, and satisfy the requirements of 326 IAC 2-8 (FESOP).

D.1.2 FESOP/Hazardous Air Pollutants [326 IAC 2-8][326 IAC 2-4.1]

- (a) The total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned.
- (b) The source shall not clean any tank trucks or non-pressurized railcars that contain a HAP with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with these limits is equivalent to HAP emissions less than 5.12 tons per twelve consecutive month period. These limits, in conjunction with the limits in Condition D.2.1, are structured such that the emissions of any combination of HAPs from the entire source shall be less than 10 tons per year.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 2-4.1 (Hazardous Air Pollutants) not applicable, and satisfy the requirements of 326 IAC 2-8 (FESOP).

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Railcar and Tank Truck Cleaning Operations.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.1 and D.1.2. The Permittee shall maintain records of the:
- (1) Calendar dates covered in the compliance determination period;
 - (2) Number of railcars and tank trucks, containing VOCs or HAPs, cleaned at the source;
 - (3) Contents of all tank trucks and railcars cleaned; and
 - (4) Vapor pressures of the contents (if the contents are volatile organic compounds).
- (b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information used to document compliance with Conditions D.1.1 and D.1.2, in any compliance period shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Purging/Degassing Operation

- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity 1 railcar per two hours, and emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-1.

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

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

D.2.1 VOC/HAP Emission Limitations [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6][326 IAC 2-1.1-5]

- (a) VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 1.11 pounds per hour.
- (b) The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.

Compliance with these limits is equivalent to VOC and HAP emissions less than 4.88 tons per twelve consecutive month period. These limits, in conjunction with the limits in Conditions D.1.1 and D.1.2, are structured such that the total VOC emissions and total HAP emissions from the source shall be less than 25 tons per year and 10 tons per year, respectively.

Compliance with these limits will satisfy the requirements of 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-3 (Emission Offset), 326 IAC 2-1.1-5 (Nonattainment NSR) and 326 IAC 8-1-6 (BACT) not applicable.

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

In order comply with Condition D.2.1:

- (a) A flare, controlling VOC and HAP emissions exhausting to stack S-1, shall be:
- (1) Installed, calibrated, and maintained according to the manufacturers specifications and operated at all times when emissions may be vented to it.
 - (2) Designed and operated such that no visible emissions are present as determined by Method 22, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- (b) The following equipment must be installed, calibrated, maintained, and operated in conjunction with the flare:
- (1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame
 - (2) A device that records the gas flow to the flare. The Permittee shall install, calibrate, and maintain a gas flow rate measuring and record the flow to the control device at least every fifteen minutes.

D.2.4 Flare Testing

Within 180 days after issuance of this permit, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC/HAP testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.5 Flare Pilot Flame

The presence of a flare pilot flame shall be monitored continuously using a thermocouple or any other equivalent device to detect the presence of a flame.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.6 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the:
 - (1) Gas flow rate sent to the flare;
 - (2) Contents of all railcars cleaned; and
 - (3) Vapor pressures of the contents (if the contents are volatile organic compounds).
- (b) To document compliance with Condition D.2.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2]

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

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

D.3.1 Particulate Matter - Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from the 0.38 MMBtu/hr natural gas-fired boiler shall not exceed 0.6 pounds per million BTU heat input.

D.3.2 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 26, 2001. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. The plan is included as Appendix A.

D.3.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant portable shot blasting unit shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

SECTION D.4

FACILITY OPERATION CONDITIONS

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

- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Five (5) space heaters, and five (5) HVAC units.
- (e) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

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

There are no specifically applicable requirements that apply to these facilities.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: United Transportation Group
Source Address: 1150 East 145th Street, East Chicago, IN 46312
Mailing Address: P.O. Box 300, East Chicago, IN 46312
FESOP No.: F089-14993-00469

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: United Transportation Group
Source Address: 1150 East 145th Street, East Chicago, IN 46312
Mailing Address: P.O. Box 300, East Chicago, IN 46312
FESOP No.: F089-14993-00469

This form consists of 2 pages

Page 1 of 2

☛ This is an emergency as defined in 326 IAC 2-7-1(12)
☐ The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
☐ The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
 Source Address: 1150 East 145th Street, East Chicago, IN 46312
 Mailing Address: P.O. Box 300, East Chicago, IN 46312
 FESOP No.: F089-14993-00469
 Facility: Railcar and Tank Truck Cleaning Operations
 Parameter: Number of tank trucks and railcars cleaned that contains any HAP.
 Limit: 750 tank trucks; for every railcar cleaned that contains HAPs, this limit is reduced by 3.43 tank trucks

YEAR: _____

Month	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
Source Address: 1150 East 145th Street, East Chicago, IN 46312
Mailing Address: P.O. Box 300, East Chicago, IN 46312
FESOP No.: F089-14993-00469
Facility: Railcar and Tank Truck Cleaning Operations
Parameter: Number of tank trucks and railcars cleaned that contains any VOC.
Limit: 2960 tank trucks; for every railcar cleaned that contains VOC, this limit is reduced by 3.43 tank trucks

YEAR: _____

Month	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on: _____

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: United Transportation Group
 Source Address: 1150 East 145th Street, East Chicago, IN 46312
 Mailing Address: P.O. Box 300, East Chicago, IN 46312
 FESOP No.: F089-14993-00469

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input checked="" type="radio"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input checked="" type="radio"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

APPENDIX A - Fugitive Dust Control Plan

Original Date: 11/02/2000

Revision No.: 1
Date: 3/11/2002
Author: Skip Parker
Re-author: Dan LoGreco
Approved: Mike Pellin

United Transportation Group

Fugitive Dust Control Program

The UTG fugitive dust emission control program has been implemented in keeping with regulations specified by IDEM for fugitive dust emissions (326 IAC 6-4 and 326 IAC 6-5)

UTG will spray the paved and unpaved areas traveled by vehicular traffic with water to limit or eliminate dust emissions from travel. Therefore dust emissions will not travel outside the limits of UTG property.

The following schedule will be adhered to and documented in the table below (or its equivalent) to indicate the days of use and/or non-use as a result of inclement weather.

Any area that may need to be to be water sprayed should be conducted along the following schedule.

Monday – Friday no later then 0900 or anytime deemed necessary. (By noting dust in the air or traveling fugitive dust as a result of vehicular traffic.)

Saturday no later then 0900 or anytime deemed necessary. (By noting dust in the air or traveling fugitive dust as a result of vehicular traffic.)

Week of:	SUN	MON	TUES	WED	THUR	FRI	SAT
Application to Paved Roads	-						
Application to Unpaved Roads	-						

C = Water application completed; N1 = Not necessary (due to inclement weather); N2 = Not necessary (due to zero or minimal dusting); Note that this table should be reproduced as necessary to ensure compliance with 326 IAC 6-4 and 326 IAC 6-5.

This is the beginning of UTG's fugitive dust emission program and it may be necessary to make changes to it in the future to further enhance the efficiency of its use.

Indiana Department of Environmental Management Office of Air Quality

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

Source Background and Description

Source Name: United Transportation Group
Source Location: 1150 East 145th Street, East Chicago, IN 46312
County: Lake County
SIC Code: 4785
Operation Permit No.: F089-14993-00469
Permit Reviewer: ERG/BS

The Office of Air Quality (OAQ) has reviewed a FESOP application from United Transportation Group ("UTG") relating to the operation of a railcar and truck tank cleaning facility.

History

The source was constructed and began operation in 1989. In 1990, UTG added two operations: tank truck cleaning, and pressurized railcar purging operations. The entire source was permitted by the East Chicago Air Quality Control Board in 1992. In 2001, the source replaced a flare that controls VOC emissions from the Pressurized Railcar Purging/ Degassing operations. IDEM received an application for an unspecified operation permit on September 26, 2001.

Permitted Emission Units and Pollution Control Equipment

The source does not contain any permitted emission units and pollution control devices.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted emission units and pollution control devices:

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, with emissions uncontrolled and vented to building B which exhaust to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, with emissions uncontrolled and vented to building A which exhausts to vent A.
- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity of 1 railcar per two hours, and emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-1.

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Several space heaters, and several HVAC units.
- (d) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

Existing Approvals

The source has constructed and/or has been operating under the following previous approvals:

- (a) East Chicago Air Quality Permit # 852, issued January 31, 1992;
- (b) East Chicago Air Quality Permit # 853, issued January 31, 1992;
- (c) East Chicago Air Quality Permit # 854, issued January 31, 1992;
- (d) East Chicago Air Quality Permit # 855, issued August 31, 1992;
- (e) East Chicago Air Quality Permit # 903, issued December 14, 1992; and
- (f) East Chicago Air Quality Permit # 904, issued December 14, 1992.

All terms and conditions from previous permits issued pursuant to permitting programs approved into the state implementation plan have been either incorporated as originally stated, revised, or deleted by this permit.

Enforcement Issue

- (a) The source was constructed in 1989 and modified in 1990 and did not receive a permit to operate until 1992. IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the section entitled Unpermitted Emission Units and Pollution Control Equipment. IDEM is also aware the source was did not receive the proper operating permit for a major source of VOC emissions in a severe non-attainment area for ozone.
- (b) IDEM is reviewing these matters and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the FESOP 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 administratively complete FESOP application for the purposes of this review was received on September 26, 2001. Additional information was received April 19, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A (pages 1 through 5) of this document for detailed emissions calculations.

Potential To Emit for the Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE of the source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	2.5
PM-10	2.5
SO ₂	0.01
VOC	324
CO	0.2
NO _x	1.2

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP	Potential To Emit (tons/year)
Benzene	unknown
Carbon disulfide	unknown
Methanol	unknown
Toluene	unknown
Formaldehyde	unknown
Hydrogen Chloride	unknown
TOTAL	greater than 25

Note: the PTE of each individual HAP is unknown because the source will only emit HAPs if a railcar or tank truck containing a HAP is cleaned. See Appendix A, pages 2-3 for more information.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any combination of HAPs is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Railcar Cleaning Operation	0.63	0.63	0	less than 20.12 ^(a)	0	0	less than 5.12 ^(b)
Tank truck Cleaning Operation	1.8	1.8	0		0	0	
Pressurized Railcar Degassing/Purging Operations	0.03	0.03	0.005	less than 4.88	0.2	1.2	less than 4.88
Total Emissions	2.46	2.46	0.005	less than 25.0^(a)	0.2	1.2	less than 10.0^(b)

(a) In order to satisfy the requirements of 326 IAC 2-8, and render the requirements of 326 IAC 2-3 and 326 IAC 8-1-6 not applicable, the total volatile organic compound (VOC) emissions from the Railcar Cleaning and Tank truck Cleaning operations shall not exceed (in aggregate) 20.12 tons per twelve consecutive month period (25 tpy less the maximum controlled VOC/HAP emissions from the Pressurized Railcar Degassing/Purging Operations). See *State Rule Applicability -326 IAC 2-3* and Appendix A for more information.

(b) In order to satisfy the requirements of 326 IAC 2-8, the total hazardous air pollutant (HAP) emissions from the Railcar Cleaning and Tank truck Cleaning operations shall not exceed (in aggregate) 5.12 tons of any combination of hazardous air pollutants (HAP) per twelve consecutive month period (10 tpy less the maximum controlled VOC/HAP emissions from the Pressurized Railcar Degassing/Purging Operations). Note that the source specifically requested this limit. See *State Rule Applicability -326 IAC 2-3* and Appendix A for more information.

Note that the VOC emissions from the insignificant activities are negligible.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	attainment
SO ₂	primary nonattainment
NO ₂	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. VOC emissions were reviewed pursuant to the requirements of 326 IAC 2-3 (Emission Offset).
- (b) Lake County has also been classified as non-attainment for sulfur dioxide (SO₂). Therefore, these emissions were reviewed pursuant to the requirements of 326 IAC 2-3 (Emission Offset).
- (c) Lake County has been classified as attainment or unclassifiable for PM₁₀, CO, NO₂, and lead. Therefore, these emissions were reviewed pursuant to the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (c) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source has accepted limits such that the potential to emit of the source is less than 10 tons per year of a single HAP and less than 25 tons per year of any combination of HAPs, and the source does not include one or more units that belong to one or more source categories affected by the Section 112(j) MACT Hammer date of May 15, 2002.
- (d) This source is not subject to the provisions of 40 CFR Part 64, Compliance Assurance Monitoring. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. This source does not require a Part 70 permit so the requirements of 40 CFR Part 64 (CAM) are not applicable to this source or any facilities contained therein.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The source has the potential to emit each attainment regulated pollutant (NO_x and CO) less than 250 tons per year. Therefore, the source is not subject to the requirements of 326 IAC 2-2 or 40 CFR 52.21 (Prevention of Significant Deterioration).

326 IAC 2-3 (Emission Offset), 326 IAC 2-8 (FESOP), and 326 IAC 8-1-6 (BACT)

During review of the source's permit application, IDEM determined that the source was an unpermitted major source for VOC in a severe nonattainment county for ozone (Lake County). Pursuant to the EPA's "Injunctive Relief Memo" (Guidance on the Appropriate Injunctive Relief for Violations of Major New Source Review Requirements, from Eric V. Schaeffer, dated November 17, 1998), the source had to either submit a complete NSR/Emission Offset application or prove that its actual emissions are sufficiently low such that additional controls are not warranted and accept limits to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable. On April 19, 2002, the source provided operation information for the past twelve years which IDEM then used to estimate actual VOC emissions. Those emission calculations indicate that actual VOC emissions never exceeded 3.0 tons per year. As a result, it was determined that a retroactive Emission Offset permit was not necessary. The following limit has been incorporated into this FESOP to render the requirements of 326 IAC 2-3 (Emission Offset) not applicable:

The total number of tank trucks, containing any volatile organic compound (VOC), cleaned at the source shall not exceed 2960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned. In addition, the

source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.

These limits are equivalent to VOC emissions less than 20.12 tons (25 tpy less the maximum controlled VOC emissions from the Pressurized Railcar Degassing/Purging Operations) per twelve consecutive month period.

VOC emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 1.11 pounds per hour (equivalent to 4.88 tons per twelve consecutive month period). Compliance with this limit will be achieved with the use of a flare.

In addition, the total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned. In addition, the source shall not clean any tank trucks or non-pressurized railcars that contain a HAP with a vapor pressure greater than 30 mm Hg at 25°C.

This limit is equivalent to HAP emissions less than 5.12 tons (10 tpy less the maximum controlled HAP emissions from the Pressurized Railcar Degassing/Purging Operations) per twelve consecutive month period. Note that the source specifically requested to limit its potential to emit any combination of HAPs to less than 10 tons per twelve consecutive month period.

HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 1.11 pounds per hour (equivalent to 4.88 tons per twelve consecutive month period). In addition, the source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C. Compliance with this limit will be achieved with the use of a flare.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 not applicable, and satisfy the requirements of 326 IAC 2-8 (FESOP).

326 IAC 2-4.1-1 (Hazardous Air Pollutants)

The source has the potential to emit greater than 25 tons per year of any combination of HAPs. However, the source was constructed in 1989 and modified in 1990. Therefore, the source is not subject to the requirements of 326 IAC 2-4.1.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Pursuant to 326 IAC 5-1-2(2), opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4 unless otherwise specified in 326 IAC 6-1-10.1.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1-10.1 (Lake County PM-10 emission requirements)

Pursuant to 326 IAC 6-1-10.1(d), this source is not subject to 326 IAC 6-1-10.1 because it does not operate any of the specifically listed facilities regulated by this rule.

326 IAC 6-1-2 (Particulate Matter)

This source, while located in Lake County, is not subject to 326 IAC 6-1-2 (Particulate Emissions), because it does not have actual particulate matter emissions greater than ten (10) tons per year or potential particulate matter emissions greater than one hundred (100) tons per year.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

This source has the potential to emit less than five (5) tons per year fugitive particulate matter into the atmosphere in Lake County. Therefore, this source is not subject to the requirements of 326 IAC 6-1-11.1.

326 IAC 6-1-11.2 (Lake County Particulate Matter Contingency Measures)

Pursuant to 326 IAC 6-1-11.2(a)(2), any source subject to 326 IAC 6-1-11.1 is subject to the requirements of 326 IAC 6-1-11.2. Therefore, this source is not subject to 326 IAC 6-1-11.2.

326 IAC 6-2-4 (Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4, the PM emissions from the 0.38 MMBtu/hr natural gas-fired boiler, constructed after September 21, 1983, shall not exceed 0.6 pounds per million BTU heat input.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

326 IAC 6-3-2 does not apply to this source because the operations conducted at this source are not manufacturing operations.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4. Fugitive dust emissions shall be controlled according to the plan submitted on September 26, 2001. The plan is included as Appendix A to the permit.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 26, 2001. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. The plan is included as Appendix A to the permit.

326 IAC 8-1-6 (Volatile Organic Compounds - BACT)

The railcar cleaning and tank truck cleaning operations were constructed after January 1, 1980 and have the potential to emit greater than 25 tons per year. However, as indicated in the *State Rule Applicability - 326 IAC 2-3* section of this document, the VOC emissions from these operations are limited to less than 25 tons of VOC per year, in aggregate. As a result, the requirements of 326 IAC 8-1-6 do not apply to the railcar cleaning and tank truck cleaning operations.

The pressurized railcar degassing/purging operation has the potential to emit less than 25 tons of VOC per year. Therefore the requirements of 326 IAC 8-1-6 do not apply to this operation.

Testing Requirements

The Railcar and Tank Truck Cleaning operations do not use a device to control VOC emissions and compliance with 326 IAC 2-3 and 326 IAC 2-8 will be determined by recording the number of

vehicles, containing VOC, cleaned. The Pressurized Railcar Purging/Degassing operations have an uncontrolled potential to emit VOC greater than major source threshold levels and use an enclosed flare to control VOC emissions with an estimated efficiency of 98%. As a result, testing is required to determine the VOC emissions from the flare used to control emissions from the Railcar Degassing/Purging operations.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Railcar Cleaning and Tank truck Cleaning operations do not have any applicable compliance monitoring conditions. Compliance with the applicable requirements shall be demonstrated by recordkeeping and reporting.
2. The Pressurized Railcar Purging/Degassing operations have applicable compliance monitoring conditions as specified below:

The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame.

These monitoring conditions are necessary because the flare must be in operation at all times the Pressurized Railcar Purging/Degassing operations are in operation to ensure compliance with 326 IAC 2-8 and render the requirements of 326 IAC 2-3 and 326 IAC 8-1-6 not applicable.

Conclusion

The operation of this railcar and truck tank cleaning facility shall be subject to the conditions of the attached proposed FESOP 089-14993-00469.

**Appendix A: Emissions Calculations
Emissions from Degassing/Purging Operations**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit #: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004**

VOC/HAP Emissions

Note: Railcars contain VOCs and or HAPs which are purged and sent to a flare for destruction.

Operating parameters

Capacity:	0.5	cars/hour	
Operating Schedule:	8760	Hours	
Volume of high pressure railcar:	33,500	gal	= 126,817 Liters
Flare efficiency:	98	%	

Estimation of residual VOC in used railcars

Assume: 1) benzene as a surrogate VOC/HAP chemical (MW = 78 lb/lbmol, VP at 25degC = 0.125 atm)
2) Pressure in "empty" railcar = VP of benzene at 25 degC

$$PV = nRT$$

P =	0.125 atm
V =	126,817 liters
R =	0.0821 atm-L/gmol-K
T =	298 K

$$n = PV/RT$$

n =	647.93 gmol/ car residual
n =	111.42 lb/ car residual

$$\begin{aligned} \text{Uncontrolled VOC/HAP Emissions} &= (\text{VOC/HAP residual/car}) \times (\text{operating capacity}) = \\ &= 55.71 \text{ lb/hr} \\ &= 244.00 \text{ ton/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled VOC/HAP Emissions} &= (\text{Uncontrolled VOC/HAP Emissions}) \times (1 - \text{flare efficiency}/100) \\ &= 1.11 \text{ lb/hr} \\ &= \mathbf{4.88 \text{ ton/yr}} \end{aligned}$$

PM/PM-10, SO2, CO, and NOx Emissions (from VOC combustion)

Criteria pollutant (except VOC) emission calculations are based on the combustion of LPG.

Rate of VOC sent to flare =	55.71 lb/hr
Liquid density of LPG =	4.24 lb/gal
Amount of residual VOC combusted =	54.59 lb/hr

Summary of Emissions

Pollutant	Emission factor - combustion of LPG* (lb/10 ³ gal)	Emissions	
		(lb/hr)	(tpy)
PM	0.6	0.008	0.034
PM10	0.6	0.008	0.034
VOC/HAP	NA	NA	4.88
SO2	0.095	0.001	0.005
NOx	21	0.270	1.184
CO	3.6	0.046	0.203

*Criteria pollutant emissions data source - AP-42, section 1.5 (except VOC)

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Federally Enforceable State Operating Permit

Source Background and Description

Source Name: United Transportation Group
Source Location: 1150 East 145th Street, East Chicago, IN 46312
County: Lake County
SIC Code: 4785
Operation Permit No.: F089-14993-00469
Permit Reviewer: ERG/BS

On April 11, 2004, the Office of Air Quality (OAQ) had a notice published in the South Bend Tribune, of South Bend, Indiana, stating that United Transportation Group ("UTG") had applied for a Federally Enforceable State Operating Permit (FESOP) relating to the operation of a stationary railcar and truck tank cleaning facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit. Text with a line through it has been deleted and bold text has been added. The Table Of Contents has been modified, if applicable, to reflect any changes. The summary of the comments is as follows:

1. In the Notice of 30-day period for public comment in the fifth (5th) paragraph, the address of the East Chicago Public Library is listed as Chicago, Indiana 46312-2998. This should have been listed as East Chicago, Indiana 46312-2998. Although it is too late to make this correction to the Public Notice, the TSD addendum serves the purpose of noting this correction.
2. In Condition A.3, Insignificant Activities, Section (c), "several" space heaters and "several" HVAC units has been changed to a specific number, and in A.3(d), 'a' was changed to 'an'. In Condition A.5, Prior Permits Suspended Section, a colon (:) was placed after the word either. The same changes were made in Condition D.4(c) and Condition D.4(d).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

...

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: ~~Several~~ **Five (5)** space heaters, and ~~several five (5)~~ **five (5)** HVAC units.
- (d) Activities associated with the treatment of wastewater streams with ~~aan~~ oil and grease content less than or equal to 1% by volume.

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either:

SECTION D.4 FACILITY OPERATION CONDITIONS

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

- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: ~~Several~~ **Five (5)** space heaters, and ~~several five (5)~~ **five (5)** HVAC units.
- (d) Activities associated with the treatment of wastewater streams with ~~aan~~ oil and grease content less than or equal to 1% by volume.
- ...

- 3. In Condition B.11, Annual Compliance Certification, Section (a), July 1 has been changed to April 15. In Condition B.13 Emergency Provisions Section (b)(4), the Northwest Regional Office Telephone Number has been changed to 1-888-209-8892 or 219-757-0265, and the fax number has been changed to 219-757-0267.

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than ~~July~~ **April 15** of each year to:

B.13 Emergency Provisions [326 IAC 2-8-12]

- ...
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - ...
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and the Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

And

Northwest Regional Office
Telephone Number: 1-888-209-8892, or ~~219-881-6742~~ **219-757-0265**
Facsimile Number: ~~219-881-6745~~ **219-757-0267**

4. The word “performed” in Condition C. 13 has been removed as it is unnecessary.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing ~~performed~~ required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

5. The section referring to a pH meter in Condition C.14 (Pressure Gauge and Other Instrument Specifications), has been deleted as a pH meter as one does not exist at this source.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

...

~~(e) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.~~

(c d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

6. In Condition C.16 (Compliance Response Plan - Preparation, Implementation, Records, and Reports Section) the phrase “and local agency when applicable” has been removed.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ ~~(and local agency when applicable)~~ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of: ...

7. A 326 IAC 2-4.1 rule citation belongs in the header of Condition D.1.2. This has been updated as follows:

D.1.2 FESOP/Hazardous Air Pollutants [326 IAC 2-8] [326 IAC 2-4.1]

- (a) The total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned.

...

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) **and 326 IAC 2-4.1 (Hazardous Air Pollutants)** not applicable, and satisfy the requirements of 326 IAC 2-8 (FESOP).

8. "T" in the word truck in Condition D.1.3 (Preventative Maintenance Plan) and in the FESOP Quarterly Reports has been capitalized.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the Railcar and Tank tTruck Cleaning Operations.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
Source Address: 1150 East 145th Street, East Chicago, IN 46312
Mailing Address: P.O. Box 300, East Chicago, IN 46312
FESOP No.: F089-14993-00469
Facility: Railcar and Tank tTruck Cleaning Operations
Parameter: Number of tank trucks and railcars cleaned that contains any HAP.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
Source Address: 1150 East 145th Street, East Chicago, IN 46312
Mailing Address: P.O. Box 300, East Chicago, IN 46312
FESOP No.: F089-14993-00469
Facility: Railcar and Tank Truck Cleaning Operations
Parameter: Number of tank trucks and railcars cleaned that contains any VOC.

9. In Condition D.1.5, Reporting Requirements, the word 'form' has been changed to 'forms'.

D.1.5 Reporting Requirements

A quarterly summary of the information used to document compliance with Conditions D.1.1 and D.1.2, in any compliance period shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

10. In Condition D.2.1(b), VOC/HAP Emission Limitations, in the first paragraph, the reference to D.2.1 was changed to D.1.2, which is the appropriate reference.

D.2.1 VOC/HAP Emission Limitations [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6]

...

(b) The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.

Compliance with these limits is equivalent to VOC and HAP emissions less than 4.88 tons per twelve consecutive month period. These limits, in conjunction with the limits in Conditions D.1.1 and ~~D.2.1~~ **D.1.2**, are structured such that the total VOC emissions and total HAP emissions from the source shall be less than 25 tons per year and 10 tons per year, respectively.

11. In Condition D.2.3, Volatile Organic Compounds (VOC and Hazardous Air Pollutants (HAP)), Section (a) should read "emissions exhausting to stack S-1". This has been updated as follows:

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

In order comply with Condition D.2.1:

(a) A flare, controlling VOC and HAP emissions ~~from~~ **exhausting to** stack S-1, shall be:

12. There is a space missing between the C and the dash in Condition D.2.4, Flare Testing, where it reads "in accordance with Section C - Performance Testing". This space has been added.

D.2.4 Flare Testing

Within 180 days after issuance of this permit, in order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC/HAP testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years

from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section ~~C~~ **C** - Performance Testing.

13. In Condition D.2.5, Flare Pilot Flame, the word “continuously” has been inserted between the words monitored and using:

D.2.5 Flare Pilot Flame

The presence of a flare pilot flame shall be monitored **continuously** using a thermocouple or any other equivalent device to detect the presence of a flame.

14. UTG operates a portable shotblasting unit which is used to blast liners out of railcars and which was not listed in the permit. The following changes were made to the permit to incorporate the portable shotblasting unit:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) **Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2]**
- (e d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: ~~Several~~ **Five (5)** space heaters, and ~~several~~ **five (5)** HVAC units.
- (d e) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

SECTION D.3 FACILITY OPERATION CONDITIONS

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) **Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shot blasting unit used to remove railcar liners. [326 IAC 6-3-2]**

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

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

D.3.1 Particulate Matter - Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from the 0.38 MMBtu/hr natural gas-fired boiler shall not exceed 0.6 pounds per million BTU heat input.

D.3.2 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 26, 2001. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. The plan is included as Appendix A.

D.3.3 Particulate Emission Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the insignificant portable shot blasting unit shall be limited by the following:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

SECTION D.4 FACILITY OPERATION CONDITIONS

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

(e d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: ~~Several~~ **Five (5)** space heaters, and ~~several five (5)~~ **five (5)** HVAC units.

(d e) Activities associated with the treatment of wastewater streams with a oil and grease content less than or equal to 1% by volume.

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

15. The I/M & Billing Section name has been changed to Billing, Licensing, and Training Section.

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, ~~I/M & Billing Section~~ **Billing, Licensing, and Training Section**), to determine the appropriate permit fee.

16. In accordance with the credible evidence rule (62 Fed. Reg. 8314, Feb 24, 1997); Section 113(a) of the Clean Air Act, 42 U.S. C. § 7413 (a); and a letter from the United States Environmental Protection Agency (USEPA) to IDEM, OAQ dated May, 18 2004, all permits must address the use of credible evidence. The following language will be incorporated into the permit to address credible evidence:

B.23 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

17. The following changes were made to incorporate revisions to 326 IAC 2-6:

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) ~~The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:~~

_____ Indiana Department of Environmental Management
_____ Technical Support and Modeling Section, Office of Air Quality
_____ 100 North Senate Avenue, P.O. Box 6015
_____ Indianapolis, Indiana 46206-6015

~~The emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).~~

- (a) **In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2007 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:**
- (1) **Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);**
 - (2) **Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) (“Regulated pollutant, which is used only for purposes of Section 19 of this rule”) from the source, for purpose of fee assessment.**

The statement must be submitted to:

**Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

18. Condition D.2.3(b)(2) includes requirements pertaining to a bypass line with respect to the Railcar Degassing Operation. That operation does not have a bypass line and all gas is routed to the flare. As a result, the following changes have been made:

D.2.3 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

In order to comply with Condition D.2.1:

...

- (b) The following equipment must be installed, calibrated, maintained, and operated in conjunction with the flare:
- (1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame
 - (2) A device that records **the** gas flow to ~~or bypass~~ of the flare. The Permittee shall ~~either~~ install, calibrate, and maintain a gas flow rate measuring device ~~that shall~~ **and** record the flow to the ~~control device flare~~ at least every fifteen minutes. ~~;~~ **or** secure the bypass line valve in the closed position with a ~~carseal or a lock-and-key type configuration.~~ A visual inspection of the seal or closure of the

~~seal or closure mechanism shall be performed at least once every month to ensure that the valve is maintained in the closed position and that the gas flow is not diverted through the bypass line.~~

19. On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Lake County has been designated as nonattainment for the 8-hour ozone standard.

Since no modifications have been completed since the effective date of the 8-hr ozone standard, this source is not subject to any related requirements at this time. In addition, it is classified as a minor source for both the 1-hr and 8-hr ozone standards under nonattainment New Source Review (NSR) because it has the potential to emit less than 25 tons of VOC per year.

The following changes were made to the permit:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a railcar and truck tank cleaning facility.

Authorized Individual:	Owner, United Transportation Group
Source Address:	1150 East 145 th Street, East Chicago, IN 46312
Mailing Address:	P.O. Box 300, East Chicago, IN 46312
General Source Phone:	(219) 392-8100
SIC Code:	4785
County Location:	Lake
Source Location Status:	Nonattainment for ozone (1-hr and 8-hr standard) and SO ₂ Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD, and Emission Offset and Nonattainment NSR Rules; Minor Source, Section 112 of the Clean Air Act

D.1.1 FESOP/Emission Offset Minor Limit/**Nonattainment NSR Minor Limit** [326 IAC 2-8][326 IAC 2-3][326 IAC 8-1-6] **[326 IAC 2-1.1-5]**

- (a) The total number of tank trucks, containing volatile organic compounds (VOC), cleaned at the source shall not exceed 2960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned.
- (b) The source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with these limits is equivalent to VOC emissions less than 20.12 tons per twelve consecutive month period. These limits, in conjunction with the limits in Condition D.2.1, are structured such that the total VOC emissions from the entire source shall be less than 25 tons per year.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset), **326 IAC 2-1.1-5 (Nonattainment NSR)** and 326 IAC 8-1-6 (**BACT**) not applicable, and satisfy the requirements of 326 IAC 2-8 (FESOP).

D.2.1 VOC/HAP Emission Limitations [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6] [326 IAC 2-1.1-5]

- (a) VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 1.11 pounds per hour.
- (b) The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.

Compliance with these limits is equivalent to VOC and HAP emissions less than 4.88 tons per twelve consecutive month period. These limits, in conjunction with the limits in Conditions D.1.1 and ~~D.2.1~~ **D.1.2**, are structured such that the total VOC emissions and total HAP emissions from the source shall be less than 25 tons per year and 10 tons per year, respectively.

Compliance with these limits will satisfy the requirements of 326 IAC 2-8 (FESOP) and render the requirements of 326 IAC 2-3 (Emission Offset), **326 IAC 2-1.1-5 (Nonattainment NSR)** and 326 IAC 8-1-6 (BACT) not applicable.

**Appendix A: Emissions Calculations
Emissions from Degassing/Purging Operations**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit #: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004**

VOC/HAP Emissions

Note: Railcars contain VOCs and or HAPs which are purged and sent to a flare for destruction.

Operating parameters

Capacity:	0.5	cars/hour	
Operating Schedule:	8760	Hours	
Volume of high pressure railcar:	33,500	gal	= 126,817 Liters
Flare efficiency:	98	%	

Estimation of residual VOC in used railcars

Assume: 1) benzene as a surrogate VOC/HAP chemical (MW = 78 lb/lbmol, VP at 25degC = 0.125 atm)
2) Pressure in "empty" railcar = VP of benzene at 25 degC

$$PV = nRT$$

P =	0.125 atm
V =	126,817 liters
R =	0.0821 atm-L/gmol-K
T =	298 K

$$n = PV/RT$$

n =	647.93 gmol/ car residual
n =	111.42 lb/ car residual

$$\begin{aligned} \text{Uncontrolled VOC/HAP Emissions} &= (\text{VOC/HAP residual/car}) \times (\text{operating capacity}) = \\ &= 55.71 \text{ lb/hr} \\ &= 244.00 \text{ ton/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled VOC/HAP Emissions} &= (\text{Uncontrolled VOC/HAP Emissions}) \times (1 - \text{flare efficiency}/100) \\ &= 1.11 \text{ lb/hr} \\ &= \mathbf{4.88 \text{ ton/yr}} \end{aligned}$$

PM/PM-10, SO2, CO, and NOx Emissions (from VOC combustion)

Criteria pollutant (except VOC) emission calculations are based on the combustion of LPG.

Rate of VOC sent to flare =	55.71 lb/hr
Liquid density of LPG =	4.24 lb/gal
Amount of residual VOC combusted =	54.59 lb/hr

Summary of Emissions

Pollutant	Emission factor - combustion of LPG* (lb/10 ³ gal)	Emissions	
		(lb/hr)	(tpy)
PM	0.6	0.008	0.034
PM10	0.6	0.008	0.034
VOC/HAP	NA	NA	4.88
SO2	0.095	0.001	0.005
NOx	21	0.270	1.184
CO	3.6	0.046	0.203

*Criteria pollutant emissions data source - AP-42, section 1.5 (except VOC)

**Appendix A: Emissions Calculations
Emissions from Tank Truck Cleaning Operations**

Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit #: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004

Normal number of tanks washed/year 8976
 Maximum number of tanks containing VOC/HAP washed/year* 8976
 Maximum number of tanks containing PM washed/year** 8976
 *Assumes all tanks contain VOC/HAP when, in actuality, only approximately 7% contain VOC/HAPs
 **Assumes all tanks contain material that is a source of PM

VOC/HAP Emission factor for gaseous heel

VOC/HAP emissions were estimated based upon the chemical properties of toluene and the maximum amount of VOC/HAP in the vapor space of the rail car.

Toluene MW	Vp (mmHg)	tank vol (ft3)	Lb moles/ car	lbs/truck
92	30	936	0.10	8.80
VOC/HAP emission factor (lb/tank)				8.8

VOC/HAP Emission factor for liquid heel

As a worst case estimate, it is assumed that the liquid heel of the tank is not removed and shipped off-site, instead, it is assumed that the liquid is allowed to evaporate.
 Liquid heel assumed to be 0.0091% of product volume (per info from 089-16033-00314)

Therefore,

% loss	tank vol (ft3)	avg liq density (lb/gal)	lbs/truck
0.0091%	936	7.5	4.78
VOC/HAP emission factor (lb/tank)			4.8

Total VOC/HAP emission factor (lb/tank) 13.6

PM Emission factor

PM emissions are estimated based upon trace amounts of powder remaining in tanks (assumed 4 lbs) and 10% of PM is emitted during washing and 90 is captured in washwater.
 Amount of PM remaining in tank 4 pounds
PM emission factor (lb/tank) 0.4

Potential to Emit

	VOC/HAP		PM	
	throughput (tanks)	emissions (tons)	throughput (tanks)	emissions (tons)
Annual Emissions	8976	60.9	8976	1.8

Production Limit for 326 IAC 2-3, 326 IAC 8-1-6 and 326 IAC 2-8 (regarding VOC):

25 ton/yr threshold
 25 ton/yr - 4.88 ton/yr (from degassing/purging operations) = 20.12 ton/yr

$$20.12 \text{ ton/yr} \times \frac{1}{13.6 \text{ lb/tank}} \times 2000 \text{ lb/ton} = 2964$$

rounding down to ensure compliance with 25 ton/yr limit = **2960 truck/yr production limit (base)**

Production Limit for 326 IAC 2-8 (regarding HAP):

10 ton/yr threshold (for a single HAP); but accepted by source to avoid detailed recordkeeping of each HAP

10 ton/yr - 4.88 ton/yr (from degassing/purging operations) = 5.12 ton/yr

$$5.12 \text{ ton/yr} \times \frac{1}{13.6 \text{ lb/tank}} \times 2000 \text{ lb/ton} = 754$$

rounding down to ensure compliance with 10 ton/yr limit = **750 truck/yr production limit (base)**

**Appendix A: Emissions Calculations
Emissions from Railcar Cleaning Operations**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit #: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004**

Normal number of railcars washed/year 792
Maximum number of railcars containing VOC/HAP washed/year* 792
Maximum number of railcars containing PM washed/year** 792

*Assumes all railcars contain VOC/HAP when, in actuality, only approximately 5% contain VOCs
**Assumes all railcars contain material that is a source of PM

VOC/HAP Emission factor for gaseous heel

VOC/HAP emissions were estimated based upon the chemical properties of toluene and the maximum amount of VOC/HAP in the vapor space of the rail car.

Toluene MW	Vp (mmHg)	tank vol (ft3)	Lb moles/ car	lbs/car
92	30	3209	0.33	30.1
VOC/HAP emission factor (lb/car)				30.1

VOC/HAP Emission factor for liquid heel

As a worst case estimate, it is assumed that the liquid heel of the tank is not removed and shipped off-
Liquid heel assumed to be 0.0091% of product volume (per info from 089-16033-00314)

Therefore,

% loss	tank vol (ft3)	avg liq density (lb/gal)	lbs/car
0.0091%	3209	7.5	16.38
VOC/HAP emission factor (lb/tank)			16.4

Total VOC/HAP emission factor (lb/car) 46.5

PM Emission factor

PM emissions are estimated based upon trace amounts of powder remaining in tanks (assumed 16 lbs) and 10% of PM is emitted during washing and 90 is captured in washwater.

Amount of PM remaining in car 16 pounds
PM emission factor (lb/car) 1.6 pounds

Potential To Emit

	VOC/HAP		PM	
	throughput (cars)	emissions (tons)	throughput (cars)	emissions (tons)
Annual Emissions	792	18.4	792	0.63

Production Limit adjustment factor for 326 IAC 2-3:

46.5 lb/railcar = **3.43 tanktrucks per railcar**
13.6 lb/tanktruck (in terms of VOC/HAP emissions)

Therefore, for every railcar containing VOC/HAP cleaned, the tanktruck production limit shall be decreased by that ratio

**Appendix A: Emissions Calculations
Particulate Matter from Fugitive Sources**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit #: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004**

Paved Roads

Maximum Vehicular Speed: 10 mph
Average Distance of Haul: 0.25 miles
Weighted Average Gross Weight: 20 tons

Vehicle Type	No. of One Way Trips per Hour	Weight
tanker truck	2	17.5
car	1	2.5
total	3	

Calculations:

$$E = k(sL/2)^{0.65} * (W/3)^{1.5}$$

E = Emission factor (lbs/vehicle miles traveled(VMT))
k = 0.016 particle size multiplier for PM-10
0.082 particle size multiplier for PM
sL = 0.4 road surface silt content (g/m²)
W = 20 weighted average vehicle weight (tons)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT= 6570 (miles/yr)

$$E = \frac{PM}{VMT} = 0.4958456 \text{ lbs/VMT}$$

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
Potential PM Emissions (ton/yr) = **1.63 tpy**

$$E = \frac{PM-10}{VMT} = 0.09675036 \text{ lbs/VMT}$$

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
Potential PM-10 Emissions (ton/yr) = **0.32 tpy**

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100**

Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-14993-00469
Reviewer: ERG/BS
Date: March 12, 2004

Total Source
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.38

3.3

Emission Factor in lb/MMCF	PM	PM10	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential to Emit (ton/yr)	0.0	0.0	0.0	0.2	0.0	0.1

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Note that HAP emissions from natural gas combustion are negligible.

VOC emissions from the curing ovens that result from the drying of coatings are accounted for in the surface coating operations.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton