

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES

**Ashland Chemical Company
8315 E. 33rd Street
Indianapolis, Indiana 46226**

(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.

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.

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.: F097-15558-00186	
Issued by:	Issuance Date: August 19, 2004
Original signed by John B. Chavez, Administrator Indianapolis Office of Environmental Services	Expiration Date: August 19, 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), and Indianapolis Office of Environmental Services (OES). The information describing the source, contained in conditions A.2 and 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 stationary bulk chemical packaging and distribution operation.

Authorized Individual:	Plant Manager
Source Address:	8315 E. 33 rd Street, Indianapolis Indiana 46226
Mailing Address:	5200 Blazer Parkway, DA-4, Dublin, Ohio 43017
General Source Phone:	317 – 895 - 2200
SIC Code:	5169
Source Location Status:	Marion County
Source Status:	Attainment for all criteria pollutants Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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) Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (b) Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (c) Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- (d) Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- (e) Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (f) Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (g) Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (h) Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (i) Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (j) Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (k) Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (l) Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (m) Tank 13, fixed roof tank with a storage capacity of 8,239 gallons, constructed in 1965.
- (n) Tank 14, fixed roof blending tank with a storage capacity of 10,135 gallons, constructed in 1991.
- (o) Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- (p) Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (q) Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- (r) Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (s) Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- (t) Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (u) Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (v) Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (w) Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (x) Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (y) Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (z) Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (aa) Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.
- (bb) Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.

- (cc) Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (dd) Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ee) Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ff) Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.

- (gg) Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.

- (hh) One (1) Truck unloading and loading rack having room for two trucks, containing two (2) pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.

- (ii) Container Filling Station, with maximum pump rate of 3,600 gallons per hour.

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 less than ten million (10,000,000) Btu per hour - 2.1 Million Btu per hour boiler fired with natural gas.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as a temporary protective coating.
- (d) Cleaners and solvents, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months, characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psia measured at 38 degrees C (100 °F) or:
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psia measured at 20 degrees C (68 °F).
- (e) Paved and unpaved roads and parking lots with public access.
- (f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (g) On-site fire and emergency response training approved by the department.
- (h) Rail car unloading station dedicated for the unloading of aircraft de-icing fluid. The aircraft de-icing fluid is made up of an aqueous solution of potassium acetate. The potential emissions of VOC from this facility are negligible because the material transferred is an aqueous salt solution.

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), and OES to renew 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) deletedby 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]

- (a) 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 and OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

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, and OES within a reasonable time, any information that IDEM, OAQ, and OES 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, and OES copies of records required to be kept by this permit.

- (b) For information furnished by the Permittee to IDEM, OAQ, and OES, 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 and OES 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 an 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. All 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

- (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, and OES 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, and OES 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 maintain and implement Preventive Maintenance Plans (PMPs), 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.
- (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, and OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES 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 OES, 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 IDEM, OAQ, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for IDEM, OAQ, Compliance Section)
Facsimile No.: 317-233-5967

and

Telephone No.: 317-327-2234 (ask for OES Air Compliance Section)
Facsimile No.: 317-327-2274

- (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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, and OES, 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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 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 OES 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 OES 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 OES at least thirty (30) days in advance of the date this permit is to be reopened, except that OES 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 OES 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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

- (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, and OES on or before the date it is due.
 - (2) If IDEM, OAQ, and OES 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, and OES 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, and OES, 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
- and
- Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009
- 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

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES, 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 the requirements of 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][IC 13-30-3-1]

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, OES, 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

and

Indianapolis Office of Environmental Services
Air Permits
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

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 any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) 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 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
 - (3) 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) 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.
- (c) 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 thirty percent (30%) 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 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 unit(s) vented to the control equipment is **(are)** in operation.

C.8 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

and

Indianapolis Office of Environmental Services
Asbestos Section
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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.9 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, and OES.

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

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, and OES 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, and OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and OES, if the Permittee submits to IDEM, OAQ, and OES 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.10 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.11 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 upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

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.12 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.

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

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

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

within ninety (90) days from the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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.15 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, and OES 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, and OES that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ, and OES may extend the retesting deadline.
- (c) IDEM, OAQ, and OES reserve 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.16 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 OES Administrator makes a request for records to the Permittee, the Permittee shall furnish the records to the OES Administrator 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.17 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 Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services
Air Compliance
2700 South Belmont Avenue
Indianapolis, IN 46221-2009

- (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, and OES 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) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 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
Emission Limitations and Standards [326 IAC 2-8-4(1)]

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

Bulk Chemical Blending, Packaging, Storage, and Distribution Operation which includes the following equipment:

- (a) Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (b) Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (c) Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- (d) Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- (e) Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (f) Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (g) Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (h) Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (i) Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (j) Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (k) Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (l) Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (m) Tank 13, fixed roof tank with a storage capacity of 8,239 gallons, constructed in 1965.
- (n) Tank 14, fixed roof blending tank with a storage capacity of 10,135 gallons, constructed in 1991.
- (o) Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- (p) Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (q) Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- (r) Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (s) Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- (t) Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (u) Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (v) Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (w) Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (x) Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (y) Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (z) Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (aa) Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.
- (bb) Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.
- (cc) Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (dd) Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ee) Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ff) Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.
- (gg) Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.
- (hh) One (1) Truck unloading and loading rack having room for two trucks, containing two (2) pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.
 - (ii) Container Filling Station, with maximum pump rate of 3,600 gallons per hour.

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the VOC emissions to less than 49.9 tons per twelve (12) consecutive month period, such that the requirements of the Part 70 Operating Permit Regulation 326 IAC 2-7 shall not apply.

D.1.2 Hazardous Air Pollutants (HAP) [326 IAC 2-8-4(1)]

Pursuant to 326 IAC 2-8-4(1), the Permittee shall limit the emissions of any single HAP to less than 4.9 tons per twelve (12) consecutive month period and the emissions of any combination of HAPs to less than 12.4 tons per twelve (12) consecutive month period such that the requirements of the Part 70 Operating Permit Program 326 IAC 2-7 shall not apply.

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) and HAPs

Compliance with the emissions limitations in conditions D.1.1 and D.1.2 shall be based on monthly emissions calculations, performed using the following procedures:

- (a) For monthly emissions calculation purposes the Permittee shall utilize a Microsoft Access based computer program AACIS (Ashland Air Compliance Information System), which stores and processes materials and product throughput data from the Ashland Chemical Company product sales/accounting system (SAP) for each type of product handling activity that has the potential of producing emissions to the atmosphere. These activities shall include tank storage, truck compartment loading, container filling (e.g. totes, drums, and pails), and fugitive emission equipment (e.g. pumps, valves, and flanges). Emission calculations shall be performed for each product handling activity based on this monthly throughput.
- (b) The AACIS system shall provide reports for each calendar month, and reports generated by AACIS shall contain the following information:
 - (1) For bulk loading: month, product name, amount in gallons, and identification of transfer point.
 - (2) For container filling transfers: month, product name, amount in gallons, and identification of transfer point
- (c) Emission calculations shall be based on the USEPA TANKS program for storage tank working and breathing losses, SOCFI average emission factors for fugitives, and the following formula (AP-42, section 4.4) for the Bulk Loading and Container filling operations:

$$E = 12.46 * S * P * M / T, \text{ where:}$$
 - E = pounds of emissions per 1000 gallons loaded;
 - S = saturation factor (1.45 for splash loading and 0.6 for submerged fill);
 - P = vapor pressure (psia);
 - M = mol. wt (lb/lb mole);
 - T = Temp (R).
- (d) Storage tank throughput shall be electronically sent to the USEPA TANKS program (3.0 or more current version), and tank emissions shall be electronically returned to emission tables in the AACIS program. Loading and container filling throughput shall be used in a subroutine that calculates loading loss emissions, and those emissions shall be returned to the AACIS emission tables. Product handling throughputs shall be used with pump rates to determine fugitive emissions which shall also be returned to the AACIS emission tables.
- (e) For the purpose of HAPs emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emission.

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 keep records of chemicals inventory and throughput for each transfer and storage operation (input and output data from AACIS system and TANKS program). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period and shall include, but not limited to:
- (1) the number of gallons of each material;
 - (2) the molecular weight of each material;
 - (3) the vapor pressure of each material;
 - (4) the composition of each solvent (VOC and HAPs content);
 - (5) the type of operation used for each solvent (e.g., container filling or mixing or loading rack);
 - (6) the month in which the transfers occurred.
- (b) Pursuant to 40 CFR Part 60.110b(b), the Permittee is required to keep records of the design capacity and an analysis showing the capacity of the storage tanks 15, 25 and 26 in accordance with 40 CFR Part 60.116(a) and (b) for the life of the source.
- (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 to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. The report submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

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

Insignificant Activities: 2.1 Million Btu per hour boiler fired with natural gas.

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

D.2.1 Particulate Matter (PM) [326 IAC 6-2]

Pursuant to 326 IAC 6-2-2(a), the Particulate emissions from the 2.1 million Btu per hour boiler shall be limited to less than 0.6 pounds per million Btu of heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

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

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-15558-00186

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
- Emergency/Deviation Occurrence Reporting Form
- Test Result (specify) _____
- Report (specify) _____
- Notification (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 DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

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

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-15558-00186

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input checked="" type="radio"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) The Permittee must notify the OES and OAQ, within four (4) business hours; and must submit notice in writing or by facsimile to OES and OAQ within two (2) days, and follow the other of 326 IAC 2-8-12
<input type="radio"/> 2. This is a deviation, reportable per 326 IAC 2-8-4(3)(C) must submit notice in writing within ten (10) calendar days

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/Deviation:
Describe the cause of the Emergency/Deviation:

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

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? 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/deviation:
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: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-15558-00186
Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
Parameter: Volatile Organic Compound Emissions
Limit: 49.9 tons of VOC per twelve consecutive month period, rolled monthly

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-15558-00186
 Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
 Parameter: Hazardous Air Pollutant Emissions
 Limit: 4.9 tons of an individual HAP per twelve consecutive month period, rolled monthly.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR COMPLIANCE**

FESOP Quarterly Report

Source Name: Ashland Chemical Company
Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
FESOP No.: F097-15558-00186
Facility: Bulk Chemical Blending, Packaging, Storage, and Distribution Operation
Parameter: Hazardous Air Pollutant Emissions
Limit: 12.4 tons of any combination of HAPs per twelve consecutive month period, rolled monthly.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

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

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR COMPLIANCE**

FESOP Quarterly Deviation and Compliance Monitoring Report

Source Name: Ashland Chemical Company
 Source Address: 8315 E. 33rd Street, Indianapolis, Indiana 46226
 Mailing Address: 5200 Blazer Parkway, DA-4, Dublin Ohio 43017
 FESOP No.: F097-15558-00186

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>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
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:	
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.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

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

Source Background and Description

Source Name:	Ashland Chemical Company
Source Location:	8315 E. 33rd Street, Indianapolis, IN 46226
County:	Marion
SIC Code:	5169
Operation Permit No.:	097-5455-00186
Operation Permit Issuance Date:	January 21, 1998
Permit Renewal No.:	097-15558-00186
Permit Reviewer:	Boris Gorlin

The Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from Ashland Chemical Company relating to the operation of bulk chemicals and solvents blending, packaging, storage, and distribution facility.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Tank 1, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (b) Tank 2, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (c) Tank 3, fixed roof tank with a storage capacity of 14,100 gallons, constructed in 1965.
- (d) Tank 4, fixed roof tank with a storage capacity of 15,060 gallons, constructed in 1965.
- (e) Tank 5, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (f) Tank 6, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (g) Tank 7, fixed roof tank with a storage capacity of 6,843 gallons, constructed in 1965.
- (h) Tank 8, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (i) Tank 9, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (j) Tank 10, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (k) Tank 11, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (l) Tank 12, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (m) Tank 13, fixed roof tank with a storage capacity of 8,239 gallons, constructed in 1965.
- (n) Tank 14, fixed roof blending tank with a storage capacity of 10,135 gallons, constructed in 1991.
- (o) Tank 15, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1990.
- (p) Tank 16, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (q) Tank 17, fixed roof tank with a storage capacity of 6,806 gallons, constructed in 1965.
- (r) Tank 18, fixed roof tank with a storage capacity of 6,768 gallons, constructed in 1965.
- (s) Tank 19, fixed roof tank with a storage capacity of 12,307 gallons, constructed in 1965.
- (t) Tank 20, fixed roof tank with a storage capacity of 15,546 gallons, constructed in 1965.
- (u) Tank 21, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.

- (v) Tank 22, fixed roof tank with a storage capacity of 20,209 gallons, constructed in 1965.
- (w) Tank 23, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (x) Tank 24, fixed roof tank with a storage capacity of 9,597 gallons, constructed in 1965.
- (y) Tank 25, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (z) Tank 26, fixed roof tank with a storage capacity of 29,611 gallons, constructed in 1987.
- (aa) Tank 27, fixed roof tank with a storage capacity of 9,651 gallons, constructed in 1965.
- (bb) Tank 28, fixed roof tank with a storage capacity of 9,913 gallons, constructed in 1965.
- (cc) Tank 29, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (dd) Tank 30, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ee) Tank 31, fixed roof tank with a storage capacity of 1,322 gallons, constructed in 1989.
- (ff) Tank 36, fixed roof tank with a storage capacity of 8,097 gallons, constructed in 1986.

Storage Tanks (a) – (ff) store or process different chemicals, rotating depending on particular source contracts. Stored and processed chemicals include, but are not limited to: different solvents, Glycol Ether, Dimethyl Formamide, aircraft deicing fluid, aqueous solution of potassium acetate, Methylene Chloride, Hexane, Trichloroethane, etc.

- (gg) Three (3) railcar unloading stations with pipes which lead underground to two risers at the truck unloading rack. The pipes from two of the rail car unloading stations merge underground before rising at the truck load out station. At the truck loading rack there are two pumps and headers which lead to the tank farm. The maximum combined pumping rate is approximately 30,000 gallons per hour. This facility was constructed in 1965.
 - (hh) One (1) Truck unloading and loading rack having room for two trucks, containing two (2) pumps with headers which lead to the tank farm. The maximum combined pumping rate is 30,000 gallons per hour. This facility was constructed in 1965.
- (ii) Container Filling Station, with maximum pump rate of 3,600 gallons per hour.

Unpermitted Emission Units and Pollution Control Equipment

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

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 less than ten million (10,000,000) Btu per hour - 2.1 Million Btu per hour boiler fired with natural gas.
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 3,500 gallons per day or less.
- (c) Application of oils, greases, lubricants or other nonvolatile materials applied as a temporary protective coating.
- (d) Cleaners and solvents, the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months, characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15 mmHg; or 0.3 psia measured at 38 degrees C (100 °F) or:
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5 mmHg; or 0.1 psia measured at 20 degrees C (68 °F).

- (e) Paved and unpaved roads and parking lots with public access.
- (f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (g) On-site fire and emergency response training approved by the department.
- (h) Rail car unloading station dedicated for the unloading of aircraft de-icing fluid. The aircraft de-icing fluid is made up of an aqueous solution of potassium acetate. The potential emissions of VOC from this facility are negligible because the material transferred is an aqueous salt solution.

Existing Approvals

The source has been operating under the previous FESOP 097-5455-00186 issued on January 21, 1998, with an expiration date of January 20, 2003, and the Administrative Amendment 097-10244-00186, issued on October 28, 1998.

All conditions from previous approvals were incorporated into this FESOP, except applicability of Emission Reporting rule 326 IAC 2-6 which was modified in March of 2004.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP renewal 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 renewal application for the purposes of this review was received on December 14, 2002. Additional information was received on January 21, 2004.

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

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1-6 of 6).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.13
PM-10	0.13
SO ₂	Negligible
VOC	176.0
CO	0.19
NO _x	0.92

HAPs	Unrestricted Potential Emissions (tons/yr)
Methylene Chloride	21.91
1,1,1 Trichloroethane	10.34
Hexane	8.03
Total	>25

- (a) The unrestricted potential emissions of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a 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. The source will be issued a FESOP because the source will limit its emissions below the Title V levels.
- (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 particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP.

Process/emission unit	Potential To Emit (tons/year)						HAPs
	PM	PM-10	SO ₂	VOC	CO	NO _x	
Rail Car/Truck Unloading, Tanks and Filling of Containers	Negl.	Negl.	Negl.	49.9	Negl.	Negl.	4.9 tons of highest individual HAP; 12.4 tons of any Combination of HAPs
Insignificant Activities (Boilers)	0.13	0.13	Negl.	0.05	0.19	0.92	Negligible
Total Emissions	0.13	0.13	Negl.	49.95	0.19	0.92.	4.9 tons of highest individual HAP; 12.4 tons of any Combination of HAP

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO _x	Maintenance
NO ₂	Attainment
Ozone	maintenance
CO	Maintenance
Lead	Maintenance

- (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. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.13
PM-10	0.13
SO ₂	Negligible
VOC	49.95
CO	0.19
NO _x	0.92
Single HAP	4.9
Combination HAPs	12.4

- (a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories.
- (b) This existing source is **not** a major stationary source because no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories.

Federal Rule Applicability

- (a) Since Storage Tank 16 has capacity of 20,209 gallons (76.5 cubic meters) and Storage Tanks 21 and 22 have capacity of 29,611 gallons (112.1 cubic meters) each, and were installed in 1965 (before July 23, 1984), they are not subject to 40 CFR 60.110b, Subpart Kb.
- (b) Since tanks 15, 25 and 26 were constructed after July 23, 1984, have individual storage capacities of greater than 75 cubic meters and less than 151 cubic meters, and may store liquids with a maximum true vapor pressure greater than 15 kPa, they are subject to 40 CFR 60.110b, Subpart Kb (amended on October 15, 2003). The Subpart Kb only applicable requirement is 60.116 (b). Pursuant to this rule, the Permittee shall keep records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, for the life of the source.
- (c) This regulation (40 CFR 60, Subpart Kb) does not apply to the other tanks, based on the date constructed and/or the storage capacity of the tanks.
- (d) New Source Performance Standard for Synthetic Organic Chemical Manufacturing Operations 40 CFR Parts 60.480, 60.610, 60.660 and 60.700 (Subparts VV, III, NNN, and RRR) do not apply to this source because this source does not produce chemicals through

chemical synthesis but is only involved with blending of chemicals as received, packaging and distribution of chemicals.

- (e) National Emission Standard for Hazardous Air Pollutants (MACT) 40 CFR 63.2334 (Subpart EEEE), Organic Liquids Distribution (non-gasoline), does not apply to this source because it is not a major HAP source.
- (f) National Emission Standard for Hazardous Air Pollutants (MACT) 40 CFR 63.2435 (Subpart FFFF), Miscellaneous Organic Chemical Production and Processes (MON), does not apply to this source because this is not a chemical manufacturing source, and it is not a major HAP source.
- (g) According to 40 CFR Part 64 (Compliance Assurance Monitoring), § 64.2 (Applicability), neither this source or any emission unit at the source is subject to the requirements of 40 CFR Part 64 because it is not a major source that is required to obtain a part 70 or 71 permit.
- (h) New Source Performance Standard for Bulk Gasoline Terminals 40 CFR Part 60, Subpart XX does not apply to this source loading racks because this is not a bulk gasoline terminal which receives gasoline by pipeline, ship, or barge, but a bulk chemicals and solvents blending, packaging, storage, and distribution facility.
- (e) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operations of blending, packaging, and distribution of chemicals will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs, and they were all built prior to July 27, 1997. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-2 Prevention of Significant Deterioration (PSD)

This source is not one of the twenty-eight (28) listed source categories, does not have the potential to emit pollutants greater than 250 tons per year, and it was built prior to August 7, 1977, which pre-dates the PSD rule. Therefore, this source is not a major source under the PSD regulation, and 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

This source has opted to be a FESOP source, and as such it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program; therefore, pursuant to 326 IAC 2-6-1(a)(1), it is not subject to the requirements of the Emission Reporting rule 326 IAC 2-6.

326 IAC 2-8-4 (FESOP)

- (a) The VOC and HAPs emissions from the bulk chemical blending, packaging, storage, and distribution operation (includes all storage tanks, truck and rail loading stations, and drum and tote filling stations) to be limited to less than:
 - (1) 49.9 tons of VOC per twelve (12) consecutive month period, rolled monthly,
 - (2) 4.9 tons of any individual HAP per twelve (12) consecutive month period, rolled monthly,

- (3) 12.4 tons of any combination of HAPs per twelve (12) consecutive month period, rolled monthly.
- (b) To demonstrate compliance with VOC and HAPs limitations, the Permittee shall utilize a Microsoft Access based computer program AACIS (Ashland Air Compliance Information System), which stores and processes materials and product throughput data from the Ashland Chemical Company product sales/accounting system (SAP) for each type of product handling activity that has the potential of producing emissions to the atmosphere. These activities shall include tank storage, truck compartment loading, container filling (e.g. totes, drums, and pails), and fugitive emission equipment (e.g. pumps, valves, and flanges). Emission calculations shall be performed for each product handling activity based on this monthly throughput.
- (c) Emission calculations shall be based on the USEPA TANKS program for storage tank working and breathing losses, the AP-42 Section 5.2 loading loss equation for truck and container filling, and SOCM average emission factors for fugitives. Storage tank throughput shall be electronically sent to the USEPA TANKS program, and tank emissions shall be electronically returned to emission tables in the AACIS program. Loading and container filling throughput shall be used in a subroutine that calculates loading loss emissions, and those emissions shall be returned to the AACIS emission tables. Product handling throughputs shall be used with pump rates to determine fugitive emissions, which shall also be returned to the AACIS emission tables.

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 the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) 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.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This source is not subject to this rule because its limited potential to emit VOC is less than 100 tons per year.

State Rule Applicability – Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-2(a), the Particulate emissions from the 2.1 million Btu per hour boiler shall be limited to less than 0.6 pounds per million Btu of heat input.

326 IAC 8 (Volatile Organic Compound Rules)

- (a) Pursuant to 326 IAC 8-1-6 (New facilities; general reduction requirements), new facilities, as of January 1, 1980, that may be subject to this rule, are Storage Tanks ID 14 (constructed in 1991), 15 (1990), 25 and 26 (1987), 29, 30, 31, and 36 (1989). However, none of these tanks have potential emissions of 25 or more tons per year of VOC (see

Emission Calculations: Appendix A, page 4 of 6). Therefore, they are not subject to 326 IAC 8-1-6.

- (b) Three (3) railcar unloading stations with a truck unloading rack and one (1) truck unloading and loading rack are not subject to 326 IAC 8-1-6 (New facilities; general reduction requirements) because they were built before January 1, 1980 (in 1965).
- (c) This source is not subject to 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels), because it is not located in Clark, Floyd, Lake, or Porter Counties.
- (d) No other 326 IAC 8 rules apply to this source.

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, and OES, 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 in 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.

Conclusion

The operation of this stationary bulk chemical blending, packaging, storage, and distribution operation shall be subject to the conditions of the **FESOP 097-15558-00186**.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document (TSD) for a FESOP Renewal**

Source Name:	Ashland Chemical Company
Source Location:	8315 E. 33rd Street, Indianapolis, IN 46226
County:	Marion
SIC Code:	5169
Operation Permit No.:	097-5455-00186
Permit Renewal No.:	097-15558-00186
Permit Reviewer:	Boris Gorlin

On May 28, 2004, the Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that on April 12, 2002, Ashland Chemical Company, located at 8315 East 33rd Street, Indianapolis, Indiana 46226, applied for the renewal of a Federally Enforceable State Operating Permit (FESOP). The notice also stated that the OES proposed to issue a FESOP Renewal 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.

The TSD will remain as it originally appeared when published. Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and OES prefer that the Technical Support Document reflects the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision (bolded language has been added, the language with a line through it has been deleted).

No written comments were received.

Upon further review, the OAQ and OES have determined to make the following changes to the FESOP Renewal Condition D.1:

Compliance Determination Requirements

D.1.3 Volatile Organic Compounds (VOC) and HAPs

Compliance with the emissions limitations in conditions D.1.1 and D.1.2 shall be based on monthly emissions calculations, performed using the following procedures:

- (a) For monthly emissions calculation purposes the Permittee shall utilize a Microsoft Access based computer program AACIS (Ashland Air Compliance Information System), which stores and processes materials and product throughput data from the Ashland Chemical Company product sales/accounting system (SAP) for each type of product handling activity that has the potential of producing emissions to the atmosphere. These activities shall include tank storage, truck compartment loading, container filling (e.g. totes, drums, and pails), and fugitive emission equipment (e.g. pumps, valves, and flanges). Emission calculations shall be performed for each product handling activity based on this monthly throughput.
- ~~(b) Emission calculation shall be based on the USEPA TANKS program for storage tank working and breathing losses, the AP-42 Section 5.2 loading loss equation for truck and container filling, and SOCMI average emission factors for fugitives.~~

- (b) **The AACIS system shall provide reports for each calendar month, and reports generated by AACIS shall contain the following information:**
- (1) **For bulk loading: month, product name, amount in gallons, and identification of transfer point.**
 - (2) **For container filling transfers: month, product name, amount in gallons, and identification of transfer point**
- (c) **Emission calculations shall be based on the USEPA TANKS program for storage tank working and breathing losses, SOCMI average emission factors for fugitives, and the following formula (AP-42, section 4.4) for the Bulk Loading and Container filling operations:**
- $E = 12.46 * S * P * M / T$, where:**
- E = pounds of emissions per 1000 gallons loaded;**
S = saturation factor (1.45 for splash loading and 0.6 for submerged fill);
P = vapor pressure (psia);
M = mol. wt (lb/lb mole);
T = Temp (R).
- (d) Storage tank throughput shall be electronically sent to the USEPA TANKS program (**3.0 or more current version**), and tank emissions shall be electronically returned to emission tables in the AACIS program. Loading and container filling throughput shall be used in a subroutine that calculates loading loss emissions, and those emissions shall be returned to the AACIS emission tables. Product handling throughputs shall be used with pump rates to determine fugitive emissions which shall also be returned to the AACIS emission tables.
- (e) **For the purpose of HAPs emission calculations, 100% of HAP content in solvents shall be accounted for as HAP emission.**

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 the following~~ **keep records of chemicals inventory and throughput for each transfer and storage operation (input and output data from AACIS system and TANKS program). Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period and shall include, but not limited to:**
- ~~1) monthly data generated using TANKS III program in electronic or hard copy format, and~~
 - ~~2) monthly loading loss emissions calculations for the truck, railcar and container filling on operations.~~
- (1) **the number of gallons of each material;**
 - (2) **the molecular weight of each material;**
 - (3) **the vapor pressure of each material;**

- (4) **the composition of each solvent (VOC and HAPs content);**
- (5) **the type of operation used for each solvent (e.g., container filling or mixing or loading rack);**
- (6) **the month in which the transfers occurred.**
- (b) Pursuant to 40 CFR Part 60.110b(b), the Permittee is required to keep records of the design capacity and an analysis showing the capacity of the storage tanks 15, 25 and 26 in accordance with 40 CFR Part 60.116(a) and (b) for the life of the source.
- (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 to document compliance with Condition D.1.1 and D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the calendar quarter being reported. **The report submitted by the Permittee does require the certification by an “authorized individual” as defined by 326 IAC 2-1.1(1).**

Appendix A: Emission Calculations					
	Company Name:	Ashland Chemical Company			
	Plant Location:	8315 E. 33rd Street, Indianapolis, IN 46226			
	County:	Marion			
	FESOP:	F 097-15558-00186			
	Pit. ID:	097-00186			
	Permit Reviewer:	Boris Gorlin			
Point Source VOC Emissions					
The source has requested no annual throughput limits be imposed, instead the source will be tracking the emissions of VOC using the TANKS III program and AP-42 emissions factors for tanker and container loading and unloading. Ashland Chemical has requested a VOC emissions limit of 49.9 tons per two (12) month rolling sum.					
Bulk Loading Loss					
		VOC			
M = Molecular Weight		86.17			
P = True Vapor Pressure		2.44			
T = Temperature of blk. liq.		528			
S = Saturation Factor		0.6			
LL = Loading Loss		2.98			
Potential Throughput (GPY)		31,536,000			
Potential Emissions (TPY)		46.94			
Potential Throughput (GPY)		7,500,000			
Potential Emissions (TPY)		11.16			
Container Loading Loss					
		VOC			
M = Molecular Weight		86.17			
P = True Vapor Pressure		2.44			
T = Temperature of blk. liq.		528			
S = Saturation Factor		1.45			
LL = Loading Loss		7.19			
Potential Throughput (GPY)		31,536,000			
Potential Emissions (TPY)		113.44			
Potential Throughput (GPY)		2,232,000			
Potential Emissions (TPY)		8.03			
Tanks Standing Loss					
Based on Tanks III Program		VOC			
Potential Emissions (TPY)		15.58			
Total VOC emissions					
Potential Emissions (TPY) - unlimited		175.97			
Note tanks standing loss, and the container and bulk loading losses are based on the worst case VOL transferred at the facility					

Appendix A: Emission Calculations							
Company Name:		Ashland Chemical Company					
Plant Location:		8315 E. 33rd Street, Indianapolis, IN 46226					
County:		Marion					
FESOP:		F 097-15558-00186					
Plt. ID:		097-00186					
Permit Reviewer:		Boris Gorlin					
HAP Emissions							
The Ashland Chemical has requested no annual throughput limits to be imposed; instead the source will be tracking the emissions of HAPs using the USEPA TANKS program and AP-42 emissions factors for tanker and container loading and unloading. Ashland Chemical has requested a emissions limit of 12.4 tons of any combination of HAPs and 4.9 tons of any individual HAP.							
Equipment Leaks From Container Filling Operation							
	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per drumming station	Pumping Rate (gal/hr)	Hours in active service (hr/yr)	Throughput (gal/yr)	Potential HAP emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	3,600.00	28	100,800	0.0015
	Valves	0.0156	6	3,600.00	28	100,800	0.0013
	Flanges	0.0018	22	3,600.00	28	100,800	0.0006
							0.0034
Container Loading Loss							
	Worst Case all other HAP	Methylene Chloride	1,1,1 Trichloroethane	Hexane			
M = Molecular Weight	72.1	84.49	133.42	86.17			
P = True Vapor Pressure	1.48	6.79	2.03	2.44			
T = Temperature of blk. liq.	528	528	528	528			
S = Saturation Factor	1.45	1.45	1.45	1.45			
LL = Loading Loss	3.65	19.63	9.27	7.19			
Potential Throughput (GPY)	31,536,000	2,232,000	2,232,000	2,232,000			
Potential Emissions (TPY)	57.57	21.91	10.34	8.03			
Bulk Loading Loss							
	Worst Case HAP						
M = Molecular Weight	72.1						
P = True Vapor Pressure	1.48						
T = Temperature of blk. liq.	528						
S = Saturation Factor	0.6						
LL = Loading Loss	1.51						
Potential Throughput (GPY)	31,536,000						
Potential Emissions (TPY)	23.82						
Summary of any Combination of HAP Emissions							
Sources	Potential						
Bulk Loading Loss	23.82						
Tanks (Tanks 3 Program)	4.55						
Drumming Losses	57.57						
Total:	85.94						
Summary of Highest Individual HAPs							
Pollutant	Potential						
Methylene Chloride	21.91						
1,1,1 Trichloroethane	10.34						
Hexane	8.03						

Appendix A: Emission Calculations						
Company Name:		Ashland Chemical Company				
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County:		Marion				
FESOP:		F 097-15558-00186				
Plt. ID:		097-00186				
Permit Reviewer:		Boris Gorlin				
Fugitive VOC Emissions						
Total Number of Tanks	31					
Tanks dedicated to heavy liquids	25					
Tanks dedicated to light liquids	6					
Emissions Factors						
Components	Light Liquids (lbs/hr)	Liquids (lbs/hr)				
Pumps	0.1087	0.0471				
Valves	0.0156	0.0005				
Flanges	0.0018	0.0018				
Operation	Pumping Rate (gal/hr)	Hours of Operation (hr/yr)	Unlimited Product Throughput (Gal/yr)	Limited Product Throughput (Gal/yr)		
Rail Car Unloading	15,000	500	31,536,000	7,500,000		
Tanker Truck Unloading	15,000	350	31,536,000	5,250,000		
Container Filling	3,600	620	31,536,000	2,232,000		
Storage Tank Equipment Leaks						
	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Number of Tanks	Potential VOC emissions (tons/yr)	Limited PTE VOC emissions (tons/yr)
Light Liquids	Valves	0.0156	1	25	1.7082	1.7082
	Flanges	0.0018	2	25	0.3942	0.3942
Heavy Liquids	Valves	0.0005	1	6	0.01314	0.01314
	Flanges	0.0018	2	6	0.094608	0.094608
					2.210148	2.210148
Rail Car Unloading Equipment Leaks						
	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Rail Car Loadout Stations	Potential VOC emissions (tons/yr)	Limited PTE VOC emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.027175
	Valves	0.0156	8	1	0.546624	0.0312
	Flanges	0.0018	13	1	0.102492	0.00585
					1.125222	0.064225
Truck Unloading Equipment Leaks						
	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per tank	Truck Loadout Stations	Potential VOC emissions (tons/yr)	Limited PTE VOC emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.0190225
	Valves	0.0156	6	1	0.409968	0.01638
	Flanges	0.0018	22	1	0.173448	0.00693
					1.059522	0.0423325
Container Filling Equipment Leaks						
	Emission Unit	Emission Factor (lbs/hr/unit)	Number of units per drumming station	Container Filling Stations	Potential VOC emissions (tons/yr)	Limited PTE VOC emissions (tons/yr)
Light Liquids (Worst Case)	Pumps	0.1087	1	1	0.476106	0.033697
	Valves	0.0156	4	1	0.273312	0.019344
	Flanges	0.0018	20	1	0.15768	0.01116
					0.907098	0.064201
Total Potential VOC Fugitive Emissions (TPY)			5.30			
Total Limited PTE VOC Fugitive Emissions (TPY)			2.38			
Note that the none of the flanges valves and pumps are in service 8760 hours per year except for the flanges and valves associated with the tanks.						

Appendix A: Emission Calculations									
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FESOP:		F 097-15558-00186							
Pit. ID:		097-00186							
Permit Reviewer:		Boris Gorlin							
Tank ID	Tank Capacity (gallons)	Tank Capacity (Cubic Meters)	Date Installed			Loading Loss, ton/yr	Equipment leaks, ton/yr	Total, ton/yr	
1	6,843	25.90	1965	NSPS Subpart Kb not applicable					
2	6,843	25.90	1965	NSPS Subpart Kb not applicable					
3	14,100	53.37	1965	NSPS Subpart Kb not applicable					
4	15,060	57.01	1965	NSPS Subpart Kb not applicable					
5	15,546	58.85	1965	NSPS Subpart Kb not applicable					
6	6,843	25.90	1965	NSPS Subpart Kb not applicable					
7	6,843	25.90	1965	NSPS Subpart Kb not applicable					
8	15,546	58.85	1965	NSPS Subpart Kb not applicable					
9	15,546	58.85	1965	NSPS Subpart Kb not applicable					
10	15,546	58.85	1965	NSPS Subpart Kb not applicable					
11	6,768	25.62	1965	NSPS Subpart Kb not applicable					
12	6,768	25.62	1965	NSPS Subpart Kb not applicable					
13	8,239	31.19	1965	NSPS Subpart Kb not applicable					
14	10,135	38.37	1991	NSPS Subpart Kb not applicable		3.00	0.0002	3.00	<25 ton/yr
15	20,209	76.50	1990	NSPS Subpart Kb applies	Vapor Pressure >15kPa	5.99	0.0004	5.99	<25 ton/yr
16	20,209	76.50	1965	NSPS Subpart Kb not applicable					
17	6,806	25.76	1965	NSPS Subpart Kb not applicable					
18	6,768	25.62	1965	NSPS Subpart Kb not applicable					
19	12,307	46.59	1965	NSPS Subpart Kb not applicable					
20	15,546	58.85	1965	NSPS Subpart Kb not applicable					
21	20,209	76.50	1965	NSPS Subpart Kb not applicable					
22	20,209	76.50	1965	NSPS Subpart Kb not applicable					
23	9,597	36.33	1965	NSPS Subpart Kb not applicable					
24	9,597	36.33	1965	NSPS Subpart Kb not applicable					
25	29,611	112.09	1987	NSPS Subpart Kb applies	Vapor Pressure >15kPa	8.77	0.0006	8.77	<25 ton/yr
26	29,611	112.09	1987	NSPS Subpart Kb applies	Vapor Pressure >15kPa	8.77	0.0006	8.77	<25 ton/yr
27	9,651	36.53	1965	NSPS Subpart Kb not applicable					
28	9,913	37.52	1965	NSPS Subpart Kb not applicable					
29	1,322	5.00	1989	NSPS Subpart Kb not applicable		0.39	0.0000	0.39	<25 ton/yr
30	1,322	5.00	1989	NSPS Subpart Kb not applicable		0.39	0.0000	0.39	<25 ton/yr
31	1,322	5.00	1989	NSPS Subpart Kb not applicable		0.39	0.0000	0.39	<25 ton/yr
36	8,097	30.65	1989	NSPS Subpart Kb not applicable		2.40	0.0002	2.40	<25 ton/yr
Total Capacity	382,932				Total (all tanks):	113.44	2.21		

Tanks ID 15, 25, and 26 are required to comply with the only general requirements of 60.116(a)&(b)

Appendix A: Emission Calculations			
Company Name:		Ashland Chemical Company	
Plant Location:		8315 E. 33rd Street, Indianapolis, IN 46226	
County:		Marion	
FESOP:		F 097-15558-00186	
Plt. ID:		097-00186	
Permit Reviewer:		Boris Gorlin	
<u>Source Summary</u>			
Point Sources of VOCs			
	Potential VOC emissions (TPY)		
Tanker Truck/Railcar Loading Losses	46.94		
Tank Losses (Tanks 2 Program)	15.58		
Container Loading Loss	113.44		
Insignificant Emitting Activity (2.1 MMBtu Boiler)	0.05		
Total VOC Emissions	175.97		
Fugitive Sources of VOCs			
	Potential VOC emissions (TPY)		
Leaks Tanks (Valves & Flanges)	2.21		
Leaks Truck Loadout (Valves, Flanges, Pumps)	1.06		
Leaks Rail Car Loadout (Valves, Flanges, Pumps)	1.13		
Leaks Drumming Station (Valves, Flanges, Pumps)	0.91		
Total Fugitive VOC Emissions	5.30		
Total Fugitive and Point Source emissions of VOC		181.27	
Point and Fugitive Source of HAPs			
	Potential Worst Case Combination HAP emissions (TPY)		
Tanker Truck/Railcar Loading Losses	23.82		
Tank Losses (Tanks 2 Program)	4.55		
Container Loading Loss	57.57		
Leaks Tanks (Valves & Flanges)	2.21		
Leaks Truck Loadout (Valves, Flanges, Pumps)	1.06		
Leaks Rail Car Loadout (Valves, Flanges, Pumps)	1.13		
Leaks Drumming Station (Valves, Flanges, Pumps)	0.91		
Total emissions of any combination of HAPs	91.25		
Highest Individual HAPs			
	Potential Worst Case Individual HAP emissions (TPY)		
Methylene Chloride	21.91		
1,1,1 Trichloroethane	10.34		
Hexane	8.03		