INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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

June 21, 2004

TO: Interested Parties / Applicant

RE: Dover Chemical Corporation-Hammond Works / 089-18109-00227

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

Notice of Decision: Approval - Effective Immediately

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

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

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

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

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

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

Enclosures
FNPER.dot 9/16/03

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Jack Hamner
Environmental Manager
Dover Chemical Corporation - Hammond Works
3000 Sheffield Avenue
Hammond, IN 46327

June 21, 2004

Re: 089-18109-00227
Significant Source Modification to:
Part 70 permit No.: T089-7797-00227

Dear Mr. Hamner:

Dover Chemical Corporation was issued Part 70 operating permit T089-7797-00227 on March 19 2004, for the chemical manufacturing operation. An application to modify the source was received on September 5, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

1. One (1) reflux condenser associated with sulfurization reactor TR-2120.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction, which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Laws (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

This significant source modification authorizes construction of the new emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, extension 3-3031, or dial (317-233-3031).

Sincerely,

Original signed by
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

TPS
cc: File - Lake County
Lake County Health Department
Hammond Department of Environmental Management
Northwest Regional Office
Compliance Data Section
Administrative and Development
Technical Support and Modeling

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PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY
and
HAMMOND DEPARTMENT
of ENVIRONMENTAL MANAGEMENT

Dover Chemical Corporation – Hammond Works
3000 Sheffield Avenue
Hammond, IN 46327

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 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.: T 089-7797-00227	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: 03-19-2004 Expiration Date: 03-18-2009
1st. Significant Source Modification No.: 089-18109-00227	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 21, 2004

D.3 FACILITY OPERATION CONDITIONS - Sulfurization Process

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Lake County PM_{10} Emission Requirements [326 IAC 6-1-10.1] [326 IAC 6-1-5]
D.3.2 Emission PSD Minor Limit and Offset Minor Limit [326 IAC 2-2] [326 IAC 2-3]
D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Testing and Monitoring Requirement [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

Requirements

D.3.4 Scrubber Operation Requirements [326 IAC 2-7-10.5]
D.3.5 Hydrogen Sulfide (H_2S) [326 IAC 2-7-10.5]
D.3.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

Monitoring Requirements

D.3.7 Parametric Monitoring

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements
D.3.9 Reporting Requirements

Part 70 Quarterly Sulfur Usage Report
Part 70 Quarterly Sulfurization Products Report

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

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

Sulfurization process- with a maximum rated capacity of 6,000 pounds per hour of sulfurized products consisting of the following equipment:

(e) The system consisting of

(1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.

(4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 16,000 gallons.

(5) One (1) reflux condenser associated with sulfurization reactor TR-2120.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Lake County PM_{10} Emission Requirements [326 IAC 6-1-10.1.1] [326 IAC 6-1-5]

Pursuant to 326 IAC 6-1-10.1-20, the allowable PM_{10} emission rate from the Sulfurization process shall not exceed 0.157 pounds per ton, and 0.23 pounds per hour. Pursuant to 326 IAC 6-1-5(d), the Sulfurization process shall comply with both limits.

D.3.2 PSD Minor Limit and Emission Offset Minor Limit [326 IAC 2-2] [326 IAC 2-3]

(a) The amount of sulfur used by the sulfurization process shall be limited to less than 10,335 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit and the scrubber's H_2S control efficiency of 99.9 percent is required to limit the hydrogen sulfide (H_2S) emissions to less than 10 tons per twelve (12) consecutive month period. If the monitoring data is not available or indicates the scrubber is not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%). Compliance with this limit makes the rule 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(b) The amount of sulfurized products produced by the sulfurization process shall be limited

to less than 26,500 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of volatile organic compounds (VOC) emissions to less than 10 tons (Based on 0.000368 pounds of VOC per pound of finished sulfurization products) per twelve (12) consecutive month period. Compliance with this limit makes the rule 326 IAC 2-3 (Emission Offset) not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

Testing and Monitoring Requirement [326 IAC 2-7-6 (1)] [326 IAC 2-7-5 (1)]

Requirements

D.3.4 Scrubber Operation Requirements [326 IAC 2-7-10.5]

The Permittee shall operate the scrubber control system, at all times the sulfurization system is in operation.

D.3.5 Hydrogen Sulfide (H_2S) [326 IAC 2-7-10.5]

(a) The sulfurization scrubber for H_2S controls shall be in operation and control H_2S emissions from the sulfurization process at all times the sulfurization process is in operation.

(b) Caustic Scrubber - First Stage of Series: The caustic strength operations limit shall be no less than 1%. If a representative sample taken during any 8-hour shift shows a caustic percent reading of 1% or less, then the Permittee shall take one of the following steps:

(1) The caustic solution will be changed within 8 hours of test reading; or

(2) The process shall be shutdown and the caustic solution changed before the process is started up.

(c) Caustic Scrubber - Second Stage of Series: The caustic strength at the second stage operations limit shall be no less than 10%.

(d) The on-site Quality Control laboratory shall randomly test one of the 5-day split samples retained per week, unless the process is down for five consecutive days to verify the accuracy of operations data. Enough sample of the randomly tested sample shall also be retained so that an analysis can be run if so requested by the IDEM, OAQ or HDEM within 5 day holding period. Upon request of IDEM, OAQ or HDEM, a sample of the scrubber caustic solution shall be provided and/or the IDEM, OAQ or HDEM may witness a sample collection and test of the scrubber solution.

D.3.6 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify H_2S control efficiency as per condition D.3.2 (a) and establish the caustic concentration (% by weight), hourly average operating temperature and minimum liquid circulation volume in the second stage sulfurization scrubber using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

Monitoring Requirements

D.3.7 Parametric Monitoring

(a) The Permittee shall calibrate, maintain, and operate a continuous monitoring system on the second stage sulfurization scrubber for measuring hourly average operating temperature. From the date of issuance of this permit until the approved stack test results are available the hourly average temperature of the scrubber shall not exceed 170^{o}F.

(b) (1) The Permittee shall monitor the concentration (% by weight) of caustic once per shift and the scrubber liquid flow rate in second stage sulfurization scrubber once per hour. From the date of issuance of this permit until the approved stack test results are available the concentration (% by weight) of caustic and the scrubber liquid flow rate of the scrubber shall not be lower than 10% and 80 gallons per minute, respectively.

(2) The Permittee shall test the concentration (% by weight) of caustic in first stage sulfurization scrubber once per shift.

(c) The Permittee shall monitor the volume and caustic concentration charged to the scrubbers during the recharge operations once per day.

(d) Split samples taken from the second stage scrubber shall be maintained at the facility for the most current five day calendar period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements

(a) The Permittee shall maintain the following records in accordance with Section C - General Record Keeping Requirements, of this permit:

(1) The amount of sulfur used and sulfurization products manufactured for each month.

(2) The hourly average operating temperature of the second stage of the scrubber.

(3) Records of the per shift caustic concentration and per hour liquid flow rate in second stage of the scrubber.

(4) Per shift records of the caustic concentration in the first stage of the scrubber.

(5) Daily volume and caustic concentration charged to the scrubbers during recharge.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

(a) The Permittee shall submit a quarterly report of data required by condition D.3.2 (a) and (b) within 30 days following the reporting period using the reporting forms located at the end of this permit, or their equivalent;

(b) The Permittee shall submit periodic reports to the addresses listed in Section C – General Reporting Requirements, of this permit. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Part 70 Quarterly Sulfur Usage Report

Source Name: **Dover Chemical Corporation– Hammond Works**
Source Address: **3000 Sheffield Avenue, Hammond, IN 46320**
Mailing Address: **3000 Sheffield Avenue, Hammond, IN 46320**
Significant Source Modification No.: **SSM 089-18109-00227**
Facility: **Sulfurization Process**
Limit: **10,335 tons of sulfurs used per year**

YEAR: _____

Month	Sulfur Used This Month	Sulfur Used Previous 11 Months	Sulfur Used 12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Part 70 Quarterly Production Report

Source Name: **Dover Chemical Corporation– Hammond Works**
Source Address: **3000 Sheffield Avenue, Hammond, IN 46320**
Mailing Address: **3000 Sheffield Avenue, Hammond, IN 46320**
Significant Source Modification No.: **SSM 089-18109-00227**
Facility: **Sulfurization Process**
Limit: **26,500 tons of sulfurization products per year**

YEAR: _____

Month	Sulfurization Products	Sulfurization Products	Sulfurization Products
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

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

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

Attach a signed certification to complete this report.

Issued June 21, 2004

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Significant Source Modification (SSM) and Significant Permit Modification (SPM)

Source Name:	**Dover Chemical Corporation- Hammond Works**
Source Location:	**3000 Sheffield Avenue, Hammond, IN 46320**
County:	**Lake**
SIC Code:	**2899**
Operation Permit No.:	**T089-7797-00227**
Operation Permit Issuance Date:	**03-19-04**
Significant Source Modification No.:	**SSM 089-18109-00227**
Significant Permit Modification No.:	**SPM 089-18855-00227**
Permit Reviewer:	**Dr. Trip Sinha**

On April 24, 2004, the Office of Air Quality (OAQ) had a notice published in The Post tribune, Merrillville and The Times, Munster, Indiana, stating that Dover Chemical had applied for a Part 70 Operating Permit to modify, construct, and operate the sulfurization system with a maximum rated capacity of 6,000 pounds per hour of sulfurized products at its Hammond facility. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Comments were received on the proposed Part 70 permit from the public. On April 29, 2004, Dover Chemical submitted written comments on the proposed Part 70 permit.
The summary of the comments and corresponding responses is as follows:

Note: The bolded language has been added and the language with a line through it has been deleted.

Comment 1: Virginia S. Mroz:

Mrs. Mroz wanted to know whether each type of volatile organic compounds (VOC) emission is limited to less than 10 tons per year or total emissions of all VOC species combined are 10 tons per year. There are fourteen schools where approximately 500 children go to two nearby schools. She is concerned that these VOC and hydrogen sulfide emissions into the air can effect children and adults in a harmful way.

Response 1: The combined VOC emissions of different types of VOC are limited to less than 10 tons per year, not ten tons of each kind of VOC. This is stated in operation condition no. D.3.2 (b).

Condition 3.2 (b) The amount of sulfurized products produced by the sulfurization process shall be limited to less than 26,500 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of volatile organic compounds (VOC) emissions to less than 10 tons (Based on 0.000368 pounds of VOC per pound of finished sulfurization products) per twelve (12) consecutive

month period. Compliance with this limit makes the rule 326 IAC 2-3 (Emission Offset) not applicable.

The permit does not allow any new processes or more air pollution from Dover Chemical. This permit requires the operation of a caustic scrubber to reduce emissions of total volatile organic compounds (VOC), and hydrogen sulfide (H_2S) to 10 tons, each. Dover Chemical already operates the scrubber. The permit requires that Dover Chemical monitor the scrubber and keep records of the monitoring requirements. In addition, Dover Chemical must report the emissions of VOC and H_2S quarterly to Indiana Department of Environmental Management and Hammond Department of Environmental Management. This record keeping and reporting requirements will ensure that Dover Chemical is not exceeding its emissions limits.

Dover Chemical

Comment 1: On page 5 of 7 Section D.3.7 (b) (1), It should say "The Permittee shall monitor the concentration (% by weight) of caustic once per shift and the scrubber flow rate in second stage sulfurization scrubber once per hour." The words "once per shift" were left out to monitor the caustic concentration.

On D.3.8 (a) (3) It should read " per shift records of the caustic concentration and liquid flow rate in second stage scrubber once per hour." The "once per hour" was left out.

There are other sections that reference the same record keeping or operation conditions that use the same language so these sections would need to be changed also.

Response 1: The changes have been made accordingly.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. In order to make the heading in Table of Contents consistent with the section D.3.2, the following change has been made:

   D.3.2 ~~Emission Offset~~ **PSD** Minor Limit and **Emission Offset** ~~PSD~~ Minor Limit [326 IAC 2-**2**~~3~~] [326 IAC 2-~~2~~**3**]

2. In second paragraph of section D.3.2, the typo has been corrected.

   D.3.2 (a) ……This usage limit **and the** scrubber's efficiency……

3. In section D.3.4 title, the citation **[326 IAC 2-7-10.5]** has been added.

4. In section D.3.5 (b) the word Dover has been changed to The Permittee.

   …….~~Dover~~ **the Permittee** shall take …….

5. In section D.3.5 (d), the first sentence has been corrected.

   The on-site Quality Control laboratory shall randomly test one of the 5-day split sample**s** retain~~s~~**ed** per week, unless the process is down for five consecutive days to verify the accuracy of operations data.

6. In section D.3.6, the citation D.3.2 has been changed to D.3.2 (a).

7. The condition no. D.3.8 (a)(6) has been moved to monitoring section as D.7 (d).

8. The amount of usage figure typo in the reporting form has been corrected.

9. Few typos have been corrected.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification

Source Background and Description

Source Name:	**Dover Chemical Corporation– Hammond Works**
Source Location:	**3000 Sheffield Avenue, Hammond, IN 46320**
County:	**Lake**
SIC Code:	**2899**
Operation Permit No.:	**T089-7797-00227**
Operation Permit Issuance Date:	**03-19-04**
Significant Source Modification No.:	**SSM 089-18109-00227**
Significant Permit Modification No.:	**SPM 089-18855-00227**
Permit Reviewer:	**Dr. Trip Sinha**

The Office of Air Quality (OAQ) has reviewed a modification application from Dover Chemical Corporation relating to the construction and operation of the following emission units and pollution control devices:

SECTION D.3 Sulfurization system

with a maximum rated capacity of 6,000 pounds per hour of sulfurized products consisting of the following equipment:

The system consisting of

Existing Equipment:

(1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.

(3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.

(4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 15,880 gallons.

New Equipment:

(5) One (1) reflux condenser associated with sulfurization reactor TR-2120.

Dover Chemical is taking an enforceable limit of 10 tons per year each of the volatile organic compounds (VOC) and hydrogen chloride (H_2S) emissions. This also made the sulfurization scrubber an enforceable control device.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on September 5, 2003. Additional information were received on September 11, 13, November 3, 24, 2003, and March 5, 19, 23, 26, and 30, 2004.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (**Appendix A, 3 pages)**

Justification for Modification

This existing source was issued a Part 70 permit on March 19, 2004.
Dover Chemical Corporation is taking enforceable limit of 10 tons per year each of VOC and H_2S emissions. Previously the control equipment was voluntary. Therefore, this modification is reviewed for Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5.

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
SO_2	Nonattainment
NO_2	Attainment
Ozone	Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone

standards. Lake County has been designated as severe nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emissions Offset, 326 IAC 2-3.

(b) H_2S emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2, because H_2S is a pollutant regulated under PSD.

(b) Fugitive Emissions

This type of operation is one of the 28 listed source categories under 326 IAC 2-3. Therefore, the fugitive emissions from chemical processing are counted toward the determination of Emissions Offset and PSD applicability.

Source Status

Existing Source Emissions Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
VOC	> 25

(a) This existing source is a major stationary source because it is one of the 28 listed source categories and the source has a PTE of VOC of 25 tons per year or more, and situated in Lake County, which is severe nonattainment for ozone.

Potential To Emit of Modification

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

This table reflects the changes in PTE of the new units and existing units going through this modification before controls. Control equipment is not considered federally enforceable until it has been required in an enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	0.0
CO	0.0
H_2S	0.0
NO_x	0.0

HAP's	Potential To Emit (tons/year)

H_2S	0.0

The Permittee has requested to make the existing pollution control equipment enforceable as practical matter, so that this modification will not be subject to major PSD or Emissions Offset review. Therefore, pursuant to 326 IAC 2-7-10.5 this modification is subject to Significant Source Modification.

Potential to Emit of Modification (After issuance of this permit)

Determination of Deminimis Emissions for Emissions Offset (326 IAC 2-3) purposes

Pollutant	VOC (ton/yr)
Future PTE of the new equipment	0

The future PTE of the new equipment i.e. reflux condenser, is less than 25 tons per year. Therefore, the Emissions Offset rule 326 IAC 2-3 does not apply to this modification.

Determination of Emissions Increase for PSD (326 IAC 2-2) purposes

The table below summarizes the potential to emit of the modified emission units, reflecting all limits and emissions controls. This table also shows past actual emissions and emissions increase. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Pollutant	H_2S
Future PTE*	<10.0
Past Actual**	3.55
Emissions increase	<6.00
Significant Level	10.0

* Future PTE is based on emissions after control
** Past actual emissions are based on an average of years 2001 and 2002 emissions.

(a) This modification to an existing major stationary source is not major because the emissions increase of H_2S is not above the PSD significant level. Therefore, the rule 326 IAC 2-2 does not apply to this modification.

Federal Rule Applicability

326 IAC 12 and 40 CFR Part 60, Subpart VV (Standards of Performance for Equipment Leaks of VOC in Synthetic Organic Chemical Manufacturing Industry (SOCMI))
The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.480), Subpart VV - Standards of Performance for Equipment Leaks of VOC In Synthetic Organic Chemical Manufacturing Industry (SOCMI).

326 IAC 12 and 40 CFR Part 60, Subpart III (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes)

The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore, it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.610, Subpart III - Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes.

326 IAC 12 and 40 CFR Part 60, Subpart NNN (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations)
The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.660, Subpart NNN - Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations).

326 IAC 12 and 40 CFR Part 60, Subpart RRR (Standards of Performance for Volatile Organic Compounds (VOC) Emissions from Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes)
The source does not produce specified organic chemicals as an intermediate or final product or byproduct. Therefore it is exempt from the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.700, Subpart RRR – (Standards of Performance for Volatile Organic Compounds (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes).

326 IAC 14 and 40 CFR 61 (National Emission Standards For Hazardous Air Pollutants)
The Standards for Hazardous Air Pollutants (NESHAPs) 326 IAC 14, (40 CFR 61) are not applicable to this source, because none of the pollutants covered by this rule is emitted from any of its processes.

326 IAC 20 and 40 CFR 63, Parts F and G (National Emission Standards for Hazardous Air Pollutants)
The Sulfurization process
(a) does not produce as a primary product a SOCMI chemical listed in table 1 of subpart F;

and

(a) does not use as a reactant or manufacture as a product one or more of the organic HAPs listed in table 2 of subpart F.

Therefore, Sulfurization process is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, (40 CFR 63, Parts F and G).

326 IAC 20 and 40 CFR 63, Part H (National Emission Standards for Hazardous Air Pollutants)
The National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, and 40 CFR 63 Subpart H, standard for equipment leaks, is not applicable to this source, because no 40 CFR 63 Subparts currently apply to this source.

326 IAC 20 and 40 CFR 63, Part I (National Emission Standards for Hazardous Air Pollutants)
The National Emission Standards for Hazardous Air Pollutants (NESHAPs), 326 IAC 20, and 40 CFR 63 Subpart I, Standards for Negotiated Regulation for Equipment Leaks, is not applicable to this source, because none of the listed chlorinated paraffins are emitted from this source.

National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]
The affected source, the hydrochloric production facility is the collection of unit operations and

equipment associated with production of liquid hydrochloric acid (HCl) product at a concentration of 30 weight percent or greater during its normal operations, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart NNNNN no later than 3 years after April 17, 2003, or accept to and meet an enforceable HAP emissions limit below the major source threshold prior to three years after April 17, 2003.

State Rule Applicability

There is no 326 IAC rule applicable to this modification.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Requirements and Monitoring Requirements.

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 Monitoring Requirements, also Section D of the permit. Unlike Requirements, failure to meet Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a monitoring condition will arise through a source failure to take the appropriate corrective actions within a specific time period.

The monitoring requirements applicable to this modification are as follows:

(a) The Permittee shall monitor the followings:

(1) Scrubber second stage operating temperature once an hour;

(2) Scrubber liquid recirculation flow rate once a hour; and

(3) Scrubber caustic concentration per shift.

(4) Volume and caustic concentration charged to the scrubbers once a day.

These monitoring conditions are necessary because the scrubbers controlling the processes must operate properly to ensure to satisfy the emissions limit for H_2S established in this permit.

Conclusion

The operation of the sulfurization products manufacturing operation shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 089-18109-00227 and Significant Permit Modification No. 089-18855-00227.

NONRULE POLICY DOCUMENT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NONRULE POLICY DOCUMENT

Title: Guidelines for Submittal and Review of Annual Compliance Certifications under the Federally Enforceable State Operating Permit (FESOP) and Part 70 Permit Programs
Identification Number: AIR 007 NPD
Date Originally Effective: March 6, 1997
Dates Revised: September 6, 2002
Other Policies Repealed or Amended: None
Brief Description of Subject Matter: Guidelines for IDEM and FESOP and Part 70 permittees for the annual compliance certification submittal and review requirements under 326 IAC 2-7-6(5)(C) and 326 IAC 2-8-5(a)(1)(C).
Citations Affected: 326 IAC 2-7-6(5)(C) and 326 IAC 2-8-5(a)(1)(C)

This nonrule policy document is intended solely as guidance and does not have the effect of law or represent formal Indiana Department of Environmental Management (IDEM) decisions or final actions. This nonrule policy document shall be used in conjunction with applicable laws. It does not replace applicable laws, and if it conflicts with these laws, the laws shall control. This nonrule policy document may be put into effect by IDEM thirty (30) days after presentation to the appropriate board and after it is made available for public inspection and comment, pursuant to IC 13-14-1-11.5. If the nonrule policy document is presented to more than one board, it will be effective thirty (30) days after presentation to the last. IDEM will submit the policy to the Indiana Register for publication. Revisions to the policy will follow the same procedure of presentation to the board and publication.

IDEM will begin using this nonrule policy document in reviewing annual compliance certifications submitted in 2003 and thereafter until such time as the nonrule policy document is revised.

General Requirements

1. The Annual Compliance Certification (ACC) must be submitted by the date identified in the permit as follows:
   - Part 70 (Title V) sources must submit the ACC to IDEM, U.S. EPA, Region 5, and the local air pollution control agency, where appropriate.
   - FESOP sources must submit the ACC to IDEM and the local air pollution control agency, where appropriate.

   The submittal dates are April 15 or July 1 and the ACC must be postmarked, have a shipping date on a sender's receipt from a common carrier or be hand delivered as of these dates. Refer to the permit to determine the specific submittal date and addresses.

2. The Annual Compliance Certification must cover the period from January 1 through December 31 of the year being reported, except for the first year of the permit. For the first year of the

permit, the certification is to cover the period from the date of permit issuance until December 31 of the year that the permit was issued. The time period the ACC covers should be noted on the certification.

3. The Annual Compliance Certification must include the Part 70 or FESOP certification form signed by a responsible official as defined in 326 IAC 2-7-1(34) for Part 70 sources or authorized individual as defined in 326 IAC 2-1.1-1 for FESOP sources. See pages 11 and 12 for definitions. The certification form that accompanies the ACC submitted to IDEM must contain an original signature and date.

4. The Annual Compliance Certification report is to include the following:
   - The identification of each term or condition of the permit for which compliance must be certified. This includes the permit terms or conditions under sections B, C and the various D sections.
   - The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period.
   - Whether compliance during the period was continuous or intermittent
   - Such other facts as the permitting authority may require to determine the compliance status of the source. This includes:
     - Identification of deviations, including deviations occurring during emergencies.
     - Verification of source summary information in Section A of the permit (optional).

Included with this nonrule policy document is a sample ACC form followed by guidelines for completion. Sources may create their own equivalent form for submittal as long as the required information outlined in this nonrule policy document and in applicable state and federal rules is included.

Permit amendments/modifications

Sources should be sure to use the most recent permit in effect during the reporting period as a starting point. All terms and conditions from permit amendments or modifications issued during the reporting period should be included as part of the annual compliance certification report. The source should also review requirements replaced by amendments or modifications to determine if some requirements that require certification were in effect for a portion of the reporting period. In some cases, this may be addressed by the submission of separate ACCs, although the source should be very clear in identifying the reporting period covered by the separate ACCs. If the only change has been a modification that adds a new Section D, it may be possible to submit a modified ACC that includes a separate certification for the new Section D with a different reporting period for the new requirements.

Permit renewals

Separate ACCs may also be needed to address permit renewals where the new permit is issued at some point during the year. This would be especially true if the permit terms and conditions changed significantly from one permit to the other. Once again, the source has the option of submitting separate ACCs or a modified ACC. As with permit modifications, a modified ACC would be most appropriate where the majority of the permit has remained the same, such as Sections A, B and C remaining the same, but a change or addition has occurred in Section D. In this situation, the source may be able to simply include a separate Section D certification for the changes or additions. Because the new permit will have a different permit number, the source should be sure to include the proper permit numbers and reporting periods in the ACC. In some cases, the source may wish to consult with IDEM about the proper way to address source specific situations.

If a source has to submit separate ACCs or a modified ACC for situations involving permit amendments, modifications or renewals, the source does not have to provide separate responsible official/authorized individual certifications. The ACCs can be included in one submittal with one responsible official/authorized individual certification.

Transfer of ownership and ACCs

In a situation where an owner transfers ownership or sells a source after December 31st, but prior to the ACC submittal deadline, IDEM would expect the seller to complete and submit the ACC prior to the sale. However, if the seller does not submit the ACC, the new owner would need to make the submission. IDEM suggests that the company buying the source make sure that the seller has done so or, at least, make sure the necessary information is available so the buyer can submit the ACC by the ACC submittal deadline.

If a sale takes place after the submittal deadline or later in the year, the new owner will be responsible for submitting the ACC the following year. It is recommended that the new owner makes sure the necessary information is available so that the ACC can be completed after the end of the year

A completed example is attached at the end of the nonrule policy document. The example is included to show how the required information can be provided on the ACC form to satisfy the annual compliance certification requirements. The example does not address situations where a source submits separate or modified ACCs. It is an ACC for a source that has not renewed a permit or had modifications during the reporting period. In completing the example, IDEM has chosen options that it believes appropriate. Others may have a different interpretation and would complete the certification differently. Each permit is different and each certification will be different because of the unique terms and conditions of the various permits.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O Box 6015
Indianapolis, IN 46206-6015

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form should be used to satisfy the annual certification requirements for Part 70 sources under 326 IAC 2-7-6(5) and FESOP sources under 326 IAC 2-8-5(a)(1)(C). Attach a signed certification from the permit to complete the annual compliance certification.

SOURCE INFORMATION					
Source name:					
Source address:					
City:		State:		Zip code:	
Mailing address: (if different)					
City:		State:		Zip code:	
Permit number:					
Contact person:					
Phone number:					
Fax number:					
Reporting period:					

Section A - Information Verification (Optional)
Is the information in Section A correct?
If not, what information has changed:

Attach a signed certification form from the permit to complete this report.

COMPLIANCE CERTIFICATION

The source was in continuous compliance with all of the Section B permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit:	
The source was in continuous compliance with all of the Section B permit terms and conditions that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit, except for the terms and conditions listed below:	

	Permit term/condition	Comp. status CC / IC	Methods	Report date / Comments
SECTION B - GENERAL CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

	Permit term/condition	Comp. status CC / IC	Methods	Report date / Comments
SECTION C - SOURCE OPERATION CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION D - FACILITY OPERATION CONDITIONS (copy as needed)				

CC = continuous compliance ; IC = intermittent compliance

Source information

When completing this section, provide the name, phone number, etc. for the source contact person. This person should be someone that is familiar with the plant and the Part 70 or FESOP permit. This may be an environmental manager or a consultant, but does not have to be the same person signing the certification.

Section A

There are no permit terms or conditions in Section A that require compliance. As part of the compliance certification, IDEM is asking that the source indicate whether or not the information in Section A is accurate. The verification of information is optional and IDEM will not reject an ACC if the information is not supplied. If the information is not accurate and there have been changes that have not been addressed with an administrative amendment or permit modification, IDEM requests that the source identify these changes. It should be noted that the verification does not relieve the source from complying with administrative amendment or permit modification requirements. If the owner or operator has submitted an administrative amendment or minor permit modification, but IDEM has not acted on the application, it is suggested that the date the application was submitted be included.

Examples of information that may have changed include a change in the name of the company, the addition of a new type of insignificant activity (a specifically regulated insignificant activity for Part 70 sources) not previously on-site, or the addition or removal of equipment.

Sections B, C and D

The sample form provides tables that can be used to identify the appropriate terms and conditions in Sections B, C and D. The Part 70 or FESOP permit table of contents can be used as a guide to include the condition number and description into the forms. It is not necessary to include the complete term or condition (see example).

There are some permit terms and conditions in Sections B and C that may be interdependent on terms and conditions in Sections C and D. For instance, a deviation from an emission limit or record keeping requirement in Section D would require that a deviation would also have to identified for permit condition B.8, Compliance with Permit Conditions. If a source would like to make it clear that a deviation is associated with more than one permit term or condition, the associated permit term or condition could be cross referenced in the "Report date / Comments" column, although this is not required.

In order to streamline the certification process for Section B, IDEM will allow a general statement of compliance for this section. At the top of the table for Section B, the source can indicate whether the source was in continuous compliance with all of the terms and conditions for Section B by checking one of the boxes. If the source was in continuous compliance (see discussion of continuous vs. intermittent below) with all of the terms and conditions in Section B with no deviations, check the first line and no additional information is needed. If the source was not in continuous compliance with all of the Section

B terms and conditions, then check the second line and identify any deviations in the table. This would include any deviations that result during an emergency. If the deviation or emergency has not been reported during the year in a deviation, emergency occurrence, quarterly or other compliance report, additional information should be attached to describe the deviation, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation. If the deviation or emergency was reported previously, all that needs to be included is the date of the report in the "Report date / Comments" column.

A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit, including exceedances during an emergency. Deviations would include not taking a required action, such as the failure to conduct specified compliance monitoring, to take a response step or to maintain proper records, or exceeding a permit limitation for a specified pollutant.

Because not all of the terms and conditions under Section B require compliance, an alternative would be to list out all of the terms and conditions. Then the source could indicate that the conditions that do not impose a work practice or emission standard or require testing, monitoring, record keeping or reporting are not applicable (N/A). Or the source could only list those conditions that impose a work practice or emission standard or require testing, monitoring, record keeping or reporting.

The tables for Sections C and D should be completed by filling in the table with the terms and conditions in these sections of the Part 70 or FESOP permit. Unlike Section B, the source should provide the requested information for each term and condition in Section C and various Section Ds. If a source has multiple Section Ds, the source should include all of the terms and conditions in each Section D in the table. For each of the terms and conditions, the source should provide the information called for in the table. As with Section B, if the source was not in continuous compliance with the listed terms and conditions, then any deviations (including exceedances during an emergency) should be identified in the table. If this information has been submitted to IDEM previously in a Quarterly Deviation and Compliance Monitoring Report, Emergency Occurrence Report or other required report, then the source should provide the date of that report in the column, "Report date / Comments". If the deviation has not been reported previously, additional information should be attached to describe the deviation, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation.

There may be some situations where a permit term or condition may not require a specific action (does not impose a work practice or emissions standard) or the action is dependent on something else (actions related to stack testing would only occur or be required if a stack test was actually performed). In these instances, a source may also use the designation of "N/A" for not applicable.

In some cases, a condition in Section D may include several monitoring requirements. In the attached example, condition D.1.10 and D.1.11 requires daily checks of dry filters or water baffles and a weekly overspray observation and associated record keeping. In this case, the certification lists each

of the requirements separately, conditions D.1.10(a) and D.1.10(b) and conditions D.1.11(a) and D.1.11(b). Review the permit terms and conditions carefully to determine if more than one requirement is included under a particular term or condition.

In other cases, some rules allow for several compliance options with a future compliance date and the source may choose the compliance option most appropriate for the source. In these cases, the source should identify the permit term(s) and condition(s) associated with the compliance option the source has chosen and provide the required information. The other permit terms and conditions would not be applicable and "N/A" would be used if these terms and conditions are listed.

In any case, the source should review the permit terms and conditions carefully when completing the annual compliance certification to make sure the certification is accurate and addresses each relevant permit term and condition.

Compliance status (CC/ IC):

The annual compliance certification must indicate whether compliance with the permit terms and conditions was continuous or intermittent. U.S. EPA has not defined what is considered continuous or intermittent compliance, although the issue has been the subject of much debate. If U.S. EPA issues guidance that differs from this nonrule policy document, IDEM will revise this document. In order to assist permit holders with the completion of the required certification, IDEM is providing the following guidance.

Continuous compliance (CC):

In order to certify continuous compliance, a source must have no deviations, irrespective of the monitoring frequency, for the relevant permit term or condition during the reporting period. If a source has identified a deviation during the reporting period, a source cannot certify continuous compliance for the relevant permit term or condition.

Intermittent compliance (IC):

If a deviation has occurred during the reporting period, the source must certify intermittent compliance for the particular permit term or condition. As noted previously, the source must provide information about the deviation, including what the deviation was, how long the deviation lasted, estimates of excess emissions, whether or not the deviation was corrected, and the actions taken to correct the deviation.

- If this information **has been submitted** to IDEM previously in a Quarterly Deviation and Compliance Monitoring Report, Emergency Occurrence Report or other required report, then the source should provide the date of that report in the column, "Report date / Comments".
- If this information **has not been submitted** previously, then the source should attach the information to the certification and the date included in the "Report date / Comments" column would be the date of the certification.

It should be noted that the identification of a deviation does not mean an enforcement action will be initiated. A determination of whether an enforcement action will be initiated can only be made after review and analysis of the data collected from the required monitoring, reports of deviations and any other credible evidence.

Methods:

One of the items that is required as part of an annual compliance certification is the identification of the "methods or means" used to determine the compliance status with each permit term or condition. The following is a list of standard monitoring methods and abbreviations that may be used to complete the annual compliance certification.

Continuous emission monitoring system = CEMS
Continuous opacity monitoring system = COMS
Stack test = ST
Visible emissions = VE
Record keeping = RK
Review of records = RR
Mass balance = MB
Emission factors = EF
Inspections = Insp
Fuel analysis = FA
Work practice = WP
Parametric monitoring = PM
Calculations = Calc
Other = O (specify in the Comments column)

Responsible official/Authorized individual definitions:

Part 70 requirements

"Responsible official" means the following:

A) For a corporation:

(i) a president;
(ii) a secretary;
(iii) a treasurer;
(iv) a vice president of the corporation in charge of a principal business function;
(v) any other person who performs similar policy or decision making functions for the corporation; or
(vi) a duly authorized representative of any person listed in this clause if the representative is responsible for the overall operation of one (1) or more manufacturing, production, or operating facilities applying for or subject to a Part 70 permit and either:

(AA) the facilities employ more than two hundred fifty (250) persons or have gross annual sales or expenditures exceeding twenty-five million dollars ($25,000,000) (in second quarter 1980 dollars); or
(BB) the delegation of authority to such representative is approved in advance by the commissioner.

(B) For a partnership or sole proprietorship, a general partner or the proprietor, respectively.

(C) For a municipality, state, federal, or other public agency, either a principal executive officer or ranking elected official. As used in this clause, "principal executive officer of a federal agency" includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency, for example, a regional administrator of the U.S. EPA.
(D) For affected sources:
(i) the designated representative for actions, standards, requirements, or prohibitions under Title IV of the CAA or the regulations promulgated thereunder; and
(ii) the designated representative for any other purposes under a Part 70 permit.

A duly authorized representative may be delegated authority to sign a compliance certification, but only if the following occur:

- The representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities and either:
  - the facilities employ more than 250 persons; or
  - have gross annual sales or expenditures exceeding $25,000,000 (in second quarter 1980 dollars)*****; or
  - the delegation is approved in advance by the commissioner.

An example of a responsible official or duly authorized representative would be a plant or site manager that is responsible for the overall operation of a manufacturing plant. Examples of individuals that do not meet the criteria include environmental consultants or environmental managers, human resource directors and safety coordinators that are not responsible for the overall operation of a plant.

***** IDEM can provide a conversion of the dollar figure into current dollars upon request.

FESOP requirements

"Authorized individual" means an individual responsible for the overall operation of one (1) or more manufacturing, production, or operating plants or a duly authorized representative of such person. For any public agency, the term means either a ranking elected official, the chief executive officer, or a designated representative of such person having responsibility for the overall operations of a principal geographic unit of the agency.

The definition of an "authorized individual" is similar to that of a "responsible official", except that the definition of authorized individual is not as narrow. IDEM expects that the authorized individual would have a similar level of control as a responsible official, but the definition could include health and safety managers and others.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O Box 6015
Indianapolis, IN 46206-6015

PART 70 / FESOP PERMIT- ANNUAL COMPLIANCE CERTIFICATION

This form should be used to satisfy the annual certification requirements for Part 70 sources under 326 IAC 2-7-6(5) and FESOP sources under 326 IAC 2-8-5(a)(1)(C). Attach a signed certification from the permit to complete the annual compliance certification.

SOURCE INFORMATION					
Source name:	Blue Ox Woodworks, Inc.				
Source address:	1234 N. Main St.				
City:	Greentown	State:	IN	Zip code:	47345
Mailing address: (if different)					
City:		State:		Zip code:	
Permit number:	T000-0000-0000				
Contact person:	John Smith				
Phone number:	317/989-1234				
Fax number:	317/989-5678				
Reporting period:	1/1/00 to 12/31/00				

Section A - Information Verification (Optional)
Is the information in Section A correct? No
If not, what information has changed: Degreasing operation that does not exceed 145 gallons per 12 months
and not subject to 326 IAC 20-6 has been added. Administrative amendment submitted 3/15/01. Removed paint
booth, PB-1. Administrative amendment submitted 4/10/01.

Attach a signed certification form from the permit to complete this report.

COMPLIANCE CERTIFICATION

The source was in continuous compliance with all of the permit terms and conditions in Section B that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit:	
The source was in continuous compliance with all of the permit terms and conditions in Section B that impose a work practice or emission standard or requires performance testing, monitoring, record keeping or reporting based on the monitoring methods in Section B of the permit, except for the terms and conditions listed below:	X

Permit term/condition		Comp. Status CC / IC	Methods	Report date / Comments
SECTION B - GENERAL CONDITIONS				
B.8	Compliance with Permit Conditions	IC	RK, RR, VE, WP	4/28/00 (B.10), 3/2/00 (B.11), 8/15/00 (D.1.12), 8/17/00 (C.2 and D.2.3), 9/25/00 (C.7), 10/5/00 (C.21), 4/15/01 (D.1.1 and D.1.8)
B.10	Annual Compliance Certification	IC	RR	Submitted 1999 ACC 13 days late, 4/28/00
B.11	Preventative Maintenance Plan	IC	RR	3/2/00, Failed to prepare PMP on time

CC = continuous compliance ; IC = intermittent compliance ; RK = record keeping ; RR = records review

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION C - SOURCE OPERATION CONDITIONS				
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour	CC	RK	
C.2	Opacity	IC	VE	8/17/00, Emergency Occurrence Report
C.3	Open Burning	CC	WP	
C.4	Incineration	CC	RK	
C.5	Fugitive Dust Emissions	CC	WP	
C.7	Operation of Equipment	IC	RR	9/25/00
C.8	Stack Height	CC	RK	
C.9	Asbestos Abatement Projects	CC	RK	
C.10	Performance Testing	CC	RK	
C.11	Compliance Requirements	CC	RK	
C.12	Compliance Monitoring	CC	RK	
C.13	Maintenance of Emission Monitoring Equipment	CC	RK	
C.14	Monitoring Methods	CC	PM, RK, VE	
C.15	Pressure Gauge and Other Instrument Specifications	CC	RK	
C.16	Emergency Reduction Plans	CC	RK	
C.17	Risk Management Plan	CC	RK	
C.18	Compliance Monitoring Plan - Failure to Take Response Steps	CC	RK, RR	
C.19	Actions Related to Noncompliance Demonstrated by a Stack Test	CC	RK	
C.20	Emission Statement	CC	RK	
C.21	General Record Keeping Requirements	IC	RK	10/5/00
C.22	General Reporting Requirements	CC	RR	
C.23	Compliance with 40 CFR 82 and 326 IAC 22-1; Stratospheric Ozone Protection	CC	WP	

CC = continuous compliance ; IC = intermittent compliance; RK = record keeping ; RR = records review; PM = parametric monitoring ; VE = visible emissions ; WP = work practice

Permit term/condition		Comp. status CC / IC	Methods	Report date / Comments
SECTION D - FACILITY OPERATION CONDITIONS				
D.1.1	Volatile Organic Compounds (VOC)	IC	WP	4/15/01, Deviation report attached
D.1.2	PSD Minor Limit	CC	RK	
D.1.4	Particulate Matter (PM)	CC	RK	
D.1.5	Preventive Maintenance Plan	CC	RK	
D.1.6	Testing Requirements	CC	ST	
D.1.8	VOC Emissions	IC	RK	4/15/01, Deviation report attached
D.1.9	Particulate Matter (PM)	CC	WP	
D.1.10(a)	Monitoring	CC	Insp	
D.1.10(b)	Monitoring	CC	Insp	
D.1.11(a)	Record Keeping Requirements	CC	RK	
D.1.11(b)	Record Keeping Requirements	CC	RK	
D.1.12	Reporting Requirements	IC	RR	8/15/00
D.2.1	Particulate Matter (PM)	CC	RK	
D.2.2	Preventive Maintenance Plan	CC	RK	
D.2.3	Particulate Matter (PM)	IC	RK	8/17/00, Emergency Occurrence Report
D.2.4	Visible Emissions Notations	CC	VE, RK	
D.2.5	Parametric Monitoring	CC	RK	
D.2.6	Broken or Failed Bag Detection	CC	Insp	
D.2.7(a)	Record Keeping Requirements	CC	RK	
D.2.7(b)	Record Keeping Requirements	CC	RK	
D.2.8	Reporting Requirements	CC	RR	

CC = continuous compliance ; IC = intermittent compliance ; RK = record keeping ; RR = records review ; VE = visible emissions ; Insp = inspection ; ST = stack test ; WP = work practice

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
(and include local agency if applicable)

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Blue Ox Woodworks, Inc.
Source Address: 1234 N. Main St., Greentown, IN 47345
Mailing Address: Same
Part 70 Permit No.: T000-0000-0000

Months: _September_ to _December__ Year: ___2000_____

This report is an affirmation that the source has met all the requirements stated in this permit. 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".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
x**9** THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD
Permit Requirement (specify permit condition #) B.8, D.1.1 and D.1.8
Date of Deviation: 12/2/00 to 12/7/00 — **Duration of Deviation:** 5 days
Number of Deviations: 1
Probable Cause of Deviation: A non-compliant coating was used to paint metal parts because a vendor supplied a non-compliant coating.
Response Steps Taken: Upon discovery, the company immediately resumed using a compliant coating and the non-compliant coating was returned to the vendor. The company used 100 gallons of non-compliant coating with a VOC content of 4.0 lbs./gal. and an extra 50 pounds of VOC were emitted above allowable VOC emissions.
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: Joe Smith

Title/Position: Environmental Manager

Date: 4/15/01

Phone: 317/989-1234

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Blue Ox Woodworks, Inc.
Source Address: 1234 N. Main St., Greentown, IN 47345
Mailing Address: same
Part 70 Permit No.: T000-0000-0000

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:

x **9** Annual Compliance Certification Letter

9 Test Result (specify) _____

x **9** Report (specify) Deviation report

9 Notification (specify) _____

9 Affidavit (specify) _____

9 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: Sam R. Jones

Title/Position: Vice President

Phone: 317/888-9999

Date: 4/13/01