

Via Certified Mail 7003 0500 0003 5373 6619

Mr. Richard J. Payonk
SG Solutions, LLC
444 West Sandford Avenue
West Terre Haute, IN 47885

March 28, 2005

Re: 167-20863
Third Administrative Amendment to
Title V OP 167-7353-00091

Dear Mr. Payonk:

SG Solutions, LLC (formerly known as Wabash River Energy, Ltd.) was issued a Title V Operating Permit on December 31, 1998 for a stationary gasification system operation. A letter requesting a name change (this would include all headers, footers, etc.) was received on February 24, 2005. Pursuant to the provisions of 326 IAC 2-7-11 the permit is hereby administratively amended as follows:

The source name has been changed throughout the document from Wabash River Energy, Ltd. to SG Solutions, LLC.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary gasification system with the capabilities of operating on coal, petroleum coke, or a blend of coal and petroleum coke. The system is rated at 367,000 pounds of syngas produced per hour including gasification, high and low temperature heat recovery, sour waste treatment, oxygen unit, and a flare.

Responsible Official: Richard J Payonk, Director of Operations
Source Address: 444 West Sandford Avenue, West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Avenue, West Terre Haute, Indiana 47885
SIC Code: 2869
County Location: Vigo
County Status: ~~Attainment for all criteria pollutants~~
Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD or Emission Offset Rules;

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Scott Sines, at (812) 462-3433, extension 12.

Sincerely,

George M. Needham
Director
Vigo County Air Pollution Control

Attachments

SBS

cc: IDEM - Mindy Hahn
IDEM - Winter Bottum

PART 70 OPERATING PERMIT

OFFICE OF AIR MANAGEMENT
and
VIGO COUNTY AIR POLLUTION CONTROL

SG Solutions, LLC
444 West Sandford Avenue
Terre Haute, Indiana 47885

(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 2-7 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.: T167-7353-00091	
Original Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: December 31, 1998
First Administrative Amendment 167-11851	Issuance Date: March 1, 2000
Second Administrative Amendment 167-12145	Issuance Date: August 31, 2000
First Reopening 167-13520	Issuance Date: March 6, 2002
Third Administrative Amendment 167-20863	Page(s) Affected: 1, 5-6, 38-45
Issued by: George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: March 28, 2005

SECTION A

SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary gasification system with the capabilities of operating on coal, petroleum coke, or a blend of coal and petroleum coke. The system is rated at 367,000 pounds of syngas produced per hour including gasification, high and low temperature heat recovery, sour waste treatment, oxygen unit, and a flare.

Responsible Official: Richard J Payonk, Director of Operations
Source Address: 444 West Sandford Avenue, West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Avenue, West Terre Haute, Indiana 47885
SIC Code: 2869
County Location: Vigo
County Status: Nonattainment for ozone under the 8-hour standard
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD or Emission Offset Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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

1. An acid gas removal/sulfur recovery unit, identified as unit 1A, using incineration as control, and exhausting to stack EP-1.
2. A sour water treatment system, identified as unit 1B, using incineration as control, and exhausting to stack EP-1.
3. A tank venting system, identified as unit 1C, using incineration as control, and exhausting to stack EP-1.
4. A tail gas incinerator (manufactured by L.D. Duiker, model number XIV), identified as unit 1, with a maximum heat input capacity of 52 million BTU per hour, which controls emissions from units 1A, 1B, and 1C, and exhausting to stack EP-1.
5. A flare, identified as Unit 2, with a maximum pilot rate of 1.6 million BTU per hour, and exhausting to stack EP-2.
6. Fugitive equipment leak emissions.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-

7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);

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

and

VIGO COUNTY AIR POLLUTION CONTROL

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091

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

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- 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 MANAGEMENT**

COMPLIANCE DATA SECTION
100 North Senate Avenue
Indianapolis, Indiana 46204
Phone: 317-233-5674
Fax: 317-233-5967

And

VIGO COUNTY AIR POLLUTION CONTROL
103 S. 3rd Street
Terre Haute, Indiana 47807
Phone: 812-462-3433
Fax: 812-462-3447

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2
<input type="checkbox"/> 1. This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section) and Vigo County Air Pollution Control (VCAPC) (812-462-3433); and mittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-41 and 812-462-3447 for VCAPC), and follow the other requirements of 326 IAC 2-7-16
<input type="checkbox"/> 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) mittee 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: _____

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

**and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091
Facility: Tail Gas Incinerator (Unit 1)
Parameter: Carbon Monoxide
Limit: 56 pounds per hour, 221 tons per 12 month period, rolled monthly

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- Operational temperature remained above 1400 °F
- Operation maintained at least 2% excess oxygen
- Operation maintained a minimum residence time of 0.6 seconds
- 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 MANAGEMENT
COMPLIANCE DATA SECTION**

**and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091
Facility: Tail Gas Incinerator (Unit 1)
Parameter: Sulfuric Acid Mist (H₂SO₄)
Limit: 3.79 pounds per hour, 6.8 tons per 12 month period, rolled monthly

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- Operational discharge temperature remained above 500 °F
- 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 MANAGEMENT
COMPLIANCE DATA SECTION**

**and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091
Facility: Tail Gas Incinerator (Unit 1)
Parameter: Sulfur Dioxide (SO₂)
Limit: 527 pounds per hour, 944 tons per 12 month period, rolled monthly

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	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: _____

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

**and
VIGO COUNTY AIR POLLUTION CONTROL**

Part 70 Quarterly Report

Source Name: SG Solutions, LLC
Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
Part 70 Permit No.: T167-7353-00091
Facility: Flare (Unit 2)
Parameter: Carbon Monoxide
Limit: 11,099 pounds per hour, 1401 tons per 12 month period, rolled monthly

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	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: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR MANAGEMENT
 COMPLIANCE DATA SECTION
 and
 VIGO COUNTY AIR POLLUTION CONTROL**

**PART 70 OPERATING PERMIT
 QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: SG Solutions, LLC
 Source Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
 Mailing Address: 444 West Sandford Ave., West Terre Haute, Indiana 47885
 Part 70 Permit No.: T167-7353-00091

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

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD			
Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

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

Attach a signed certification to complete this report.