



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

TO: Interested Parties / Applicant
DATE: May 9, 2006
RE: City Of Valparaiso- Elden Keuhl / 127-20926-00088
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

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 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires 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 from 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-AM.dot 1/10/05



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Steve C. Poulos
City of Valparaiso, Elden Kuehl Pollution Control Facility
1251 Joliet Road,
Valparaiso, Indiana 46383

May 09, 2006

Dear Mr. Poulos:

Re: Exempt Construction and Operation Status,
127-20926-00088

The application from City of Valparaiso, Elden Kuehl Pollution Control Facility received on March 14, 2005, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following wastewater treatment source, to be located at 1251 Joliet Road, Valparaiso, Indiana 46383, is classified as exempt from air pollution permit requirements:

- (a) One (1) digester waste gas-fired flare, known as Unit #3, installed in 1983, exhausted through Stack #3, rated at 1.15 million British thermal units per hour.
- (b) The following exempt emission units (326 IAC 2-1.1-3):
 - (1) Natural gas-fired combustion sources built in 1984 with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including two (2) natural gas fired boilers, known as Boilers #2 and #3, rated at 6.75 million British thermal units per hour, each and one (1) natural gas and digester gas fired boiler, known as Boiler #1 rated at 6.75 million British thermal units per hour.
 - (2) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
 - (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (4) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
 - (5) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
 - (6) Paved and unpaved roads and parking lots with public access.
 - (7) Asbestos abatement projects regulated by 326 IAC 14-10.
 - (8) 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.

- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) On-site fire and emergency response training approved by the department.
- (11) A laboratory as defined in 326 IAC 2-7-1(21)(D).

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
 - (a) Opacity shall not exceed an average of forty percent (40%) 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.
- (2) Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)), the three boilers, #1, #2 and #3 with a combined total rating of 20.25 million British thermal units per hour, installed after September 21, 1983, are subject to the requirements of this rule that limits PM emissions as follows:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

$$Pt = \frac{1.09}{20.25^{0.26}} = 0.499 \text{ pounds per million British thermal units.}$$

The PM emission factor for each of the three (3) boilers on natural gas is 1.9 pound per million cubic feet of natural gas according to AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3. The potential throughput at each boiler, each rated at 6.75 million British thermal units per hour, is 59.1 million cubic feet of natural gas per year (6.75 MMBtu/hr x 8,760 hrs/yr x 1 MMCF/ 1,000 MMBtu). Therefore, the potential to emit is 0.056 tons per year (59.1 MMCF/yr x 1.9 lbs/MMCF x 1 ton/2,000 lbs).

$$0.056 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.013 \text{ lb/hr}$$

$$(0.013 \text{ lb/hr} / 36.75 \text{ MMBtu/hr}) = 0.002 \text{ lb PM per MMBtu}$$

Therefore, the three (3) boilers comply with this rule.

- (3) 326 IAC 8-3 (Organic Solvent Degreasing Operations)
- (a) All parts washers constructed after January 1, 1980 are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and the Permittee shall:
- (1) Equip the cleaner with a cover;
 - (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met for the parts washer(s) constructed after July 1, 1990:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^oC) (one hundred degrees Fahrenheit (100^oF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals

(thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met for the parts washer(s) constructed after July 1, 1990:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

This existing source has submitted their Part 70 renewal application for (T 127-10673-00088) on March 14, 2005. During the review process, IDEM OAQ discovered that due to a permitted modification to this source, in which the potential to emit (PTE) was significantly lowered by the removal of two reciprocating internal combustion compressor engines. A Part 70 permit was no longer required and an exemption was the proper level of approval for this source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,
Original signed by

Kathy Moore, Section Chief
Permits Branch
Office of Air Quality

KM/tlf

cc: File - Porter County
Porter County Health Department
Air Compliance – Rick Massoels
Northwest Regional Office
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Exempt Emission Units

Source Background and Description

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Location: 1251 Joliet Road, Valparaiso, Indiana 46383
County: Porter
SIC Code: 4952
Operation Permit No.: 127-20926-00088
Permit Reviewer: Teresa Freeman

The Office of Air Quality (OAQ) has reviewed an application from City of Valparaiso, Elden Kuehl Pollution Control Facility relating to the operation of a wastewater treatment source.

Source History

The City of Valparaiso, Elden Kuehl Pollution Control Facility was issued a Part 70 Operating Permit No. T127-10673-00088 on December 29, 2000.

On February 27, 2001, the Permittee requested the removal of two (2) natural gas fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2 respectively, installed in 1985, exhausted through stacks #1 and #2, respectively, rated at 4.86 MMBtu/hr each and on March 20, 2001, an Administrative Amendment 127-13987-00088 revising the permit to remove these units and subsequent requirements from the Part 70 Operating Permit was issued. Administrative Amendment 127-17946-00088 was issued on October 8, 2003, removing the remaining requirements pertaining to the internal combustion compressor engines from the permit.

On March 14, 2005, the Permittee submitted a Part 70 Operating Permit Renewal application. Upon review of the application, it has been determined that without the internal combustion compressor engines, the City of Valparaiso, Elden Kuehl Pollution Control Facility is no longer a Part 70 Operating Source because the remaining units have a PTE of less than 10 tons per year of SO₂, NO_x, VOC and a single HAP. The PTE of PM, PM_{2.5} and PM₁₀ are less than 5 tons per year and CO is less than 25 tons per year.

Therefore, this source is now being permitted under the provisions in 326 IAC 2-1.1-3 (Exemption).

Permitted Emission Units and Pollution Control Equipment

The source consists of the following unit:

- (a) One (1) digester waste gas-fired flare, known as Unit #3, installed in 1983, exhausted through Stack #3, rated at 1.15 million British thermal units per hour.
- (b) The following exempt emission units (326 IAC 2-1.1-3):
 - (1) Natural gas-fired combustion sources built in 1984 with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including two (2) natural gas fired boilers, known as Boilers #2 and #3, rated at 6.75 million British thermal units per hour, each and one (1) natural gas and digester gas fired boiler, known as Boiler #1 rated at 6.75 million British thermal units per hour.

- (2) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (3) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (4) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (5) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (6) Paved and unpaved roads and parking lots with public access.
- (7) Asbestos abatement projects regulated by 326 IAC 14-10.
- (8) 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.
- (9) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (10) On-site fire and emergency response training approved by the department.
- (11) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Enforcement Issue

There are no enforcement actions pending.

Existing Approvals

The source was issued Part 70 Operating Permit No. T127-10673-00088 on December 29, 2000.

The source has since received the following approvals:

- (a) Administrative Amendment No. 127-17946-00088 issued on October 8, 2003; and
- (b) Administrative Amendment No. 127-13987-00088 issued on March 20, 2001.

The Part 70 permit conditions related to the two (2) natural gas fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2 respectively, installed in 1985, exhausted through stacks #1 and #2, respectively, rated at 4.86 MMBtu/hr each were not incorporated because they have been removed from the source, which has resulted in a permit level change. An exemption will be issued to the source based upon remaining emission units at the facility.

Emission Calculations

See Appendix A of this document for detailed emissions calculations on pages 1-3.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary

source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

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

Pollutant	Potential To Emit (tons/year)
PM	Less than 5
PM ₁₀	Less than 5
SO ₂	Less than 10
VOC	Less than 10
CO	Less than 25
NO _x	Less than 10

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Single HAP	Less than 10
Combined HAPs	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of all criteria pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. An exemption will be issued.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

Process/facility	Limited Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
One (1) Digester Gas-fired Waste Gas Flare	0.143	0.143	0.000	0.000	6.30	0.336	Single less than 10
Insignificant Combustion Boilers #2 & #3 Boiler #1	0.112 0.056	0.449 0.225	0.036 0.222	0.325 0.163	4.97 2.48	5.91 2.96	Single less than 10
Insignificant Activities	0.00	0.00	0.00	2.00	0.00	0.00	2.00
Total Emissions	0.311	0.817	0.258	2.49	13.75	9.21	2.31

County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	attainment
PM2.5	nonattainment
SO ₂	nonattainment
NO ₂	attainment
1-hour Ozone	nonattainment
8-hour Ozone	nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are precursors for the formation of ozone.
- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
 - (2) VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Porter County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) U.S.EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Porter County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office on behalf of IDEM filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of non-attainment areas without sufficient data. However, in order to ensure that

sources are not potentially liable for violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as surrogate for PM2.5 emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability – Entire Source section.

- (c) Porter County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) Each criteria pollutant is less than 100 tons per year.
- (b) A single hazardous air pollutant (HAP) is less than 10 tons per year; and
- (c) Any combination of HAPs is less than 25 tons per year.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this exemption.
- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart DDDDD- Standards for Industrial, Commercial and Institutional Boilers and Process Heaters because the single HAP and combined HAPs are less than 10 tons per year and 25 tons per year, respectively. Therefore this NESHAP is not included in this exemption.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR 63) included in this exemption.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset)

The total source potential emissions of all attainment pollutants (PM, PM₁₀, SO₂, VOC, NO_x and CO) are less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 326 IAC 2-3 (Emission Offset) do not apply.

326 IAC 2-6 (Emission Reporting)

This source is not subject to 326 IAC 2-6 (Emission Reporting) because it is not required to have an operating permit under 326 IAC 2-7, Part 70 Permit Program, and it does not emit Lead in the ambient air at levels equal to or greater than five (5) tons per year, and it is not located in Lake or Porter County.

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

This source will emit less than 10 tons per year of a single HAP and 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Opacity Emissions Limitations)

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

- (a) Opacity shall not exceed an average of forty percent (40%) 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.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

The three boilers, #1, #2 and #3 with a combined total rating of 20.25 million British thermal units per hour, installed after September 21, 1983, are subject to the requirements of this rule that limits PM emissions as follows:

$$Pt = \frac{1.09}{Q^{0.26}}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

$$Pt = \frac{1.09}{20.25^{0.26}} = 0.499 \text{ pounds per million British thermal units.}$$

The PM emission factor for each of the three (3) boilers on natural gas is 1.9 pound per million cubic feet of natural gas according to AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3. The potential throughput at each boiler, each rated at 6.75 million British thermal units per hour, is 59.1 million cubic feet of natural gas per year (6.75 MMBtu/hr x 8,760 hrs/yr x 1 MMCF/ 1,000 MMBtu). Therefore, the potential to emit is 0.056 tons per year (59.1 MMCF/yr x 1.9 lbs/MMCF x 1 ton/2,000 lbs).

$$0.056 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.013 \text{ lb/hr}$$

$$(0.013 \text{ lb/hr} / 20.25 \text{ MMBtu/hr}) = 0.001 \text{ lb PM per MMBtu}$$

Therefore, the three (3) boilers comply with this rule.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

This rule is not applicable because the potential to emit SO₂ from all facilities and from the entire source is less than twenty-five (25) tons per year.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Since there are no 326 IAC 8 rules that apply to this source 326 IAC 8-1-6, which requires Best Available Control Technology (BACT), could apply. This rule is not applicable since the potential VOC emissions from this source are less than twenty-five (25) tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Since the potential to emit VOC is less than twenty-five (25) tons per year and the source does not perform any surface coating operations, the requirements of this rule do not apply.

State Rule Applicability

326 IAC 8-3 (Organic Solvent Degreasing Operations)

(a) All parts washers constructed after January 1, 1980 are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and the Permittee shall:

- (1) Equip the cleaner with a cover;
- (2) Equip the cleaner with a facility for draining cleaned parts;
- (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (5) Provide a permanent, conspicuous label summarizing the operation requirements;
- (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met for the parts washer(s) constructed after July 1, 1990:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility

is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met for the parts washer(s) constructed after July 1, 1990:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

The source is not required to test any of the facilities because standard emissions factors were used for all the emission units.

Conclusion

The operation of this wastewater treatment source shall be subject to the conditions of the attached Exemption No. 127-20926-00088.