



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: August 6, 2007
RE: Praxair, Inc. / 089-21430-00330
FROM: Nisha Sizemore
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, 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 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

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.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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.



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

PART 70 OPERATING PERMIT RENEWAL OFFICE OF AIR QUALITY

**Praxair, Inc.
4400 Kennedy Avenue
East Chicago, Indiana 46312**

(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 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.

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.: T089-21430-00330	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: August 6, 2007 Expiration Date: August 6, 2012

TABLE OF CONTENTS

SECTION A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)][326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)][326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
SECTION B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]	
B.26	Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]	
SECTION C	SOURCE OPERATION CONDITIONS	17
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]	
C.7	Stack Height [326 IAC 1-7]	
C.8	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.9	Performance Testing [326 IAC 3-6]	

TABLE OF CONTENTS (Continued)

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

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

SECTION D.1 FACILITY OPERATION CONDITIONS – Natural Gas Combustion Units..... 25

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

D.1.1 PM₁₀ Limitations [326 IAC 6.8-6-14]

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

SECTION D.2 FACILITY OPERATION CONDITIONS – Insignificant Activities..... 26

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.2.2 PM₁₀ Emission Limitations [326 IAC 6.8-2-27]

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2]

Certification 29

Emergency Occurrence Report..... 30

Quarterly Deviation and Compliance Monitoring Report 32

Attachment A 34

SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates four (4) stationary cryogenic air separation plants, identified as Plants 5, 6, 7, and 8, manufacturing industrial gases.

Source Address:	4400 Kennedy Avenue, East Chicago, Indiana 46312
Mailing Address:	4400 Kennedy Avenue, East Chicago, Indiana 46312
General Source Phone Number:	(219) 391-5201
SIC Code:	2813
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 and 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) Two natural gas-fired boilers, described as follows:
 - (1) Boiler A1, constructed in 1972, with a capacity of 103 million British thermal units per hour (MMBtu/hr), and exhausting to one (1) stack, (identified as S001); and
 - (2) Boiler A2, constructed in 1972, with a capacity of 103 MMBtu/hr, and exhausting to one (1) stack, (identified as S002).
- (b) Three (3) natural gas-fired regeneration heaters, described as follows:
 - (1) Process Heater A4, constructed in 1971, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S004-A through D);
 - (2) Process Heater A5, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S005-A through D); and
 - (3) Process Heater A6, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S006-A through D).
- (c) One (1) No. 2 emergency diesel fuel-fired generator, identified as A16, constructed in July 1996, with a capacity of 6.2 MMBtu/hr, 500 kw unit, and exhausting to one (1) stack, (identified as S016).
- (d) Four (4) Safety-Kleen cold cleaner degreasing operations, each with a maximum capacity of 180 gallons of solvent per 12 months.

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

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

- (a) Emergency generators as follows: diesel generators not exceeding 1600 horsepower, including: [326 IAC 6.8-1-2]
 - (1) Emergency Generator A7, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S007-A through B.
 - (2) Emergency Generator A8, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S008-A through B.
 - (3) Emergency Generator A9, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S009-A through B.
 - (4) Emergency Generator A10, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S010-A through B.
 - (5) Emergency Generator A11, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S011.
 - (6) Emergency Generator A12, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S012.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including two (2) hand-turned abrasive blasters, identified as A18 and A19. [326 IAC 6.8-1-2]
- (c) Cooling towers not regulated under a NESHAP, including [326 IAC 6.8-1-2]:
 - (1) One (1) direct-contact cooling tower, with a flow rate of 51,000 gpm of water, and less than 25 lbs/day particulate emissions.
 - (2) One (1) direct-contact cooling tower, with a flow rate of 40,000 gpm of water, and less than 25 lbs/day particulate emissions.
 - (3) One (1) direct-contact cooling tower, with a flow rate of 10,000 gpm of water, and less than 25 lbs/day particulate emissions.

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);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

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

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5][326 IAC 2-7-4(a)(1)(D)][IC 13-15-3-6(a)]

- (a) This permit, T073-22753-00031, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

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

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)][326 IAC 2-7-6(1) and (6)][326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

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

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Permit Shield [326 IAC 2-7-15][326 IAC 2-7-20][326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided

that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T073-22753-00031 and issued pursuant to permitting programs approved into the state implementation plan have been either:

- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3][326 IAC 2-7-4][326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12][40 CFR 72]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs
[326 IAC 2-7-5(8)][326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6][IC 13-14-2-2][IC 13-30-3-1][IC 13-17-3-2]

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

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;

- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

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

B.25 Advanced Source Modification Approval [326 IAC 2-7-5(16)] [326 IAC 2-7-10.5]

- (a) The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from

the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.26 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

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

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

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.5 Fugitive Dust Emissions [326 IAC 6-4]

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

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

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on. The plan is included as Attachment A.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to

thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

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

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

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

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

Compliance Monitoring Requirements [326 IAC 2-7-5(1)][326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003

Indianapolis, Indiana 46204-2251

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

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

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

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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

C.16 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:

- (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
- (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) In accordance with the compliance schedule specified in 326 IAC 2-6-3(b)(1), starting in 2004 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall

contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

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

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

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1 (qq)) at an existing emissions unit or at a source with Plant-wide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1 (ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1 (rr) and/or IAC 2-3-1 (mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1 (ll)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section

- 326 IAC 2-2-1(rr)(2)(A)(iii) and/or 326 IAC 2-3-1 (mm)(2)(A)(iii);
and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

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

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

SECTION D.1

FACILITY OPERATION CONDITIONS

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

- (a) Two natural gas-fired boilers, described as follows:
 - (1) Boiler A1, constructed in 1972, with a capacity of 103 million British thermal units per hour (MMBtu/hr), and exhausting to one (1) stack, (identified as S001); and
 - (2) Boiler A2, constructed in 1972, with a capacity of 103 MMBtu/hr, and exhausting to one (1) stack, (identified as S002).
- (b) Three (3) natural gas-fired regeneration heaters, described as follows:
 - (1) Process Heater A4, constructed in 1971, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S004-A through D);
 - (2) Process Heater A5, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S005-A through D); and
 - (3) Process Heater A6, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S006-A through D).
- (c) One (1) No. 2 emergency diesel fuel-fired generator, identified as A16, constructed in July 1996, with a capacity of 6.2 MMBtu/hr, 500 kw unit, and exhausting to one (1) stack, (identified as S016).

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

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

D.1.1 PM₁₀ Emission Limitations [326 IAC 6.8-6-14]

Pursuant to 326 IAC 6.8-6-14 (Particulate Matter Limitations for Lake County), the PM₁₀ emissions from each of the two (2) natural gas-fired boilers A1 and A2 shall not exceed 0.618 pounds per hour or 0.003 pounds per MMBtu, and the PM₁₀ emissions from each of the three regeneration heaters, identified as A4, A5, and A6, shall not exceed 0.097 pounds per hour or 0.003 pounds per MMBtu.

D.1.2 Preventative Maintenance Plan [326 IAC 2-7-5(13)]

A Preventative Maintenance Plan, in accordance with Section B - Preventative Maintenance Plan, of this permit, is required for the two natural gas – fired boilers.

SECTION D.2

FACILITY OPERATION CONDITIONS

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

- (a) Emergency generators as follows: diesel generators not exceeding 1600 horsepower, including: [326 IAC 6.8-1-2]
- (1) Emergency Generator A7, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S007-A through B.
 - (2) Emergency Generator A8, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S008-A through B.
 - (3) Emergency Generator A9, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S009-A through B.
 - (4) Emergency Generator A10, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S010-A through B.
 - (5) Emergency Generator A11, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S011.
 - (6) Emergency Generator A12, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S012.
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including two (2) hand-turned abrasive blasters, identified as A18 and A19. [326 IAC 6.8-1-2]
- (c) Cooling towers not regulated under a NESHAP, including [326 IAC 6.8-1-2]:
- (1) One (1) direct-contact cooling tower, with a flow rate of 51,000 gpm of water, and less than 25 lbs/day particulate emissions.
 - (2) One (1) direct-contact cooling tower, with a flow rate of 40,000 gpm of water, and less than 25 lbs/day particulate emissions.
 - (3) One (1) direct-contact cooling tower, with a flow rate of 10,000 gpm of water, and less than 25 lbs/day particulate emissions.
- (d) Four (4) Safety-Kleen cold cleaner degreasing operations, each with a maximum capacity of 180 gallons of solvent per 12 months.

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

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

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or unit dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), for the cold cleaner degreaser operations without remote solvent reservoirs existing as of July 1, 1990, located in Lake County, the Permittee shall ensure that the following requirements are met:
 - (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 of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
- (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.

D.2.3 PM₁₀ Emission Limitations [326 IAC 6.8-2-27]

Pursuant to 326 IAC 6.8-2-27 (Particulate Matter Limitations for Lake County, Praxair), PM₁₀ emissions from the following operations shall not exceed the following:

Process	Emission Limit	Emission Limit (lb/hr)
Abrasive blaster A18	0.002 gr/dscf	0.028
Abrasive blaster A19	0.002 gr/dscf	0.020
Emergency generators A7-A12	0.008 lbs/MMBtu	0.279

D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from the three (3) direct contact cooling towers shall not exceed five-hundred-fifty-one-thousandths (0.551) lbs per hour each.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Praxair, Inc.
Source Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
Mailing Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
Part 70 Permit No.: 089-21430-00330

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Praxair, Inc.
Source Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
Mailing Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
Part 70 Permit No.: 089-21430-00330

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <input type="checkbox"/> This is an emergency as defined in 326 IAC 2-7-1(12) <ul style="list-style-type: none">C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); andC The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16. |
|--|

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

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

Source Name: Praxair, Inc.
 Source Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
 Mailing Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
 Part 70 Permit No.: 089-21430-00330

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

Page 1 of 2

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. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does 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".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Addendum to the Technical Support Document
for Part 70 Operating Permit Renewal**

Source Background and Description

Source Name: Praxair, Inc.
Source Location: 4400 Kennedy Avenue, East Chicago, Indiana 46312
County: Lake
SIC Code: 2813
Operation Permit No.: T089-21430-00330
Permit Reviewer: ERG/TDP

On April 12, 2007, the Office of Air Quality (OAQ) had a notice published in the The Post Tribune, in Merrillville, Indiana, and The Times, in Munster, Indiana, stating that Praxair, Inc. had applied for a Part 70 Operating Permit Renewal to operate four (4) stationary cryogenic air separation plants, identified as Plants 5, 6, 7, and 8, manufacturing industrial gases, with control. 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.

On May 4, 2007, Praxair, Inc. submitted comments on the proposed Part 70 Renewal. The summary of the comments is as follows (bolded language has been added, the language with a line through it has been deleted):

Comment 1:

In Section A.1, the general source phone number is incorrect. The correct phone number is (219)-391-5201.

Response to Comment 1:

The source phone number has been updated as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates four (4) stationary cryogenic air separation plants, identified as Plants 5, 6, 7, and 8, manufacturing industrial gases.

Source Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
Mailing Address: 4400 Kennedy Avenue, East Chicago, Indiana 46312
General Source Phone Number: ~~(219) 391-3204~~ **(219) 391-5201**
SIC Code: 2813
County Location: Lake
Source Location Status: Nonattainment for PM_{2.5}, SO₂, and 8-hour ozone
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD and Emission Offset Rules
and Nonattainment NSR;
Major Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

Comment 2:

In the Technical Support Document, under the Section Permitted Units and Pollution Control Equipment, remove line (d) entirely. The Spray Paint Booth is no longer in service at our facility.

In Section A.2, remove line A.2(d). The Spray Paint booth is no longer in service at our facility. All references to this paint spray booth should be removed from the permit. Our State Inspector, Rick Massoels, has visited our site to see that the booth is no longer in service.

In Section A.3 and D.3, item (a) should read "Degreasing operations are subject to 326 IAC 20-6..."

In the Technical Support Document, under insignificant activities, remove line (a) entirely. There is no 600 gallon diesel fuel oil storage tank on site to feed the 6 emergency generators.

In the Technical Support Document, under "State Rule Applicability - Seven (7) Emergency Generators", change the wording from "natural gas" fired generators to diesel generators in two lines of this paragraph. We have no natural gas-fired generators on site.

Response to Comment 2:

IDEM, OAQ agrees that Section D.2 should be removed entirely. The Spray Paint booth is not in service and is permanently out of service. In regards to the degreasing operations, the provisions of 326 IAC 20-6 apply to each new and existing batch vapor, in-line vapor, and in-line cold and batch cold solvent cleaning machine that uses any solvent containing:

- (1) methylene chloride (CAS No. 75-09-2);
- (2) perchloroethylene (CAS No. 127-18-4);
- (3) trichloroethylene (CAS No. 79-01-6);
- (4) 1,1,1-trichloroethane (CAS No. 71-55-6);
- (5) carbon tetrachloride (CAS No. 56-23-5);
- (6) chloroform (CAS No. 67-66-3); or
- (7) any combination of these halogenated HAP solvents;

in a total concentration greater than five percent (5%) by weight as a cleaning or drying agent. The solvents used in the parts washer contain perchloroethylene, but the total concentration is less than 5% by weight. Therefore, the degreasing operations are not subject to 326 IAC 20-6. However, IDEM, OAQ and the source have determined that the degreasing facilities are incorrectly represented as insignificant activities in the permit. There are four Safety-Kleen cold cleaner degreasing operations, each with a maximum capacity of 15 gallons of solvent per month. Therefore, the potential to emit of VOC from these facilities is as follows:

Material	Density (Lb/Gal)	Weight % Volatile Organics	Gal of Material (gal/year)	Potential VOC (lbs/yr)	Potential VOC tons per year
Safety Kleen Premium Solvent	6.80	100%	720	4896	2.45
Safety Kleen 105 Solvent Recycled	6.70	100%	720	4824	2.41

Total PTE VOC (tons/yr): 4.86

Potential VOC Pounds per Year = Weight % Organics * Max. Gal of Material (lb/year) * Density (Lb/Gal)

Potential VOC Tons per Year = Weight % Organics * Max. Gal of Material (lb/year) * Density (Lb/Gal) * (1 ton/2000 lbs)

IDEM, OAQ acknowledges the removal of the diesel fuel oil storage tank and the clarification of the fuel type of the seven (7) emergency generators.

The following changes have been made to the permit. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in

this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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:

- (c) One (1) No. 2 emergency **diesel** fuel-fired generator, identified as A16, constructed in July 1996, with a capacity of 6.2 MMBtu/hr, 500 kw unit, and exhausting to one (1) stack, (identified as S016).
- (d) Four (4) Safety-Kleen cold cleaner degreasing operations, each with a maximum capacity of 180 gallons of solvent per 12 months.**

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

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

- ~~(a) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]~~
- ~~(b-a)~~ Emergency generators as follows: diesel generators not exceeding 1600 horsepower, including: [326 IAC 6.8-1-2]
...
- ~~(e b)~~ Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including two (2) hand-turned abrasive blasters, identified as A18 and A19. [326 IAC 6.8-1-2]
- ~~(d c)~~ Cooling towers not regulated under a NESHAP, including [326 IAC 6.8-1-2]:

SECTION D.1 FACILITY OPERATION CONDITIONS

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

...

- (c) One (1) No. 2 emergency **diesel** fuel-fired generator, identified as A16, constructed in July 1996, with a capacity of 6.2 MMBtu/hr, 500 kw unit, and exhausting to one (1) stack, (identified as S016).

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

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:

...

- ~~(d) One (1) paint spray booth, (identified as A14), constructed in 1971, with a metal cylinder for painting, using air atomization spray guns, with a maximum capacity of 16.4 pounds of~~

paint per hour, using dry filters as particulate, and exhausting to one (1) stack, (identified as S033).

SECTION D.2 FACILITY OPERATION CONDITIONS

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

(d) One (1) paint spray booth, (identified as A14), constructed in 1971, a metal cylinder paint spray booth, using air atomization spray guns, with a maximum capacity of 16.4 pounds of paint per hour, using dry filters as particulate, and exhausting to one (1) stack, (identified as S033).

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

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

D.2.1 PM₁₀ Limitations [326 IAC 6.8-2-27]

Pursuant to 326 IAC 6.8-2-27 (Particulate Matter Limitations for Lake County, Praxair) PM₁₀ emissions from the cylinder paint booth, A14, shall be limited to 0.340 pounds per hour and 42.5 lb/ton.

D.2.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere of VOC in excess of three and five tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator.

D.2.3 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment of the cylinder paint booth A14 during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

D.2.4 Continuous Compliance Plan [326 IAC 6.8-8]

A Continuous Compliance Plan, in accordance with 326 IAC 6.8-8 is required for this facility. The Continuous Compliance Plan shall contain documentation of operation and maintenance practices of process operations and any particulate matter control equipment that are essential to maintaining compliance with the mass and opacity limits specified in 326 IAC 5-1 and 326 IAC 6.8-2. The Continuous Compliance Plan shall follow the requirements of 326 IAC 6.8-8-3 (Plan requirements) and 326 IAC 6.8-8-6 (Plan; Particulate Matter Control Equipment; Operation and Maintenance).

Compliance Determination Requirements

D.2.5 Particulate Control

To comply with D.2.1, the fabric filters for particulate control shall be in operation and control emissions from the cylinder paint booth A14 at all times that the cylinder paint booth is in operation.

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2][326 IAC 8-1-4]

Compliance with the VOC content contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ reserves the authority to determine compliance using Method 23 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

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

D.2.7 Record Keeping Requirements

- ~~(a) To document compliance with Conditions D.2.2, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.2.~~
 - ~~(1) The VOC content of each coating material and solvent used.~~
 - ~~(2) The amount of coating material and solvent used less water on a monthly basis.~~
 - ~~(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.~~
 - ~~(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~
- ~~(b) To document compliance with Condition D.2.1 and D.2.4, the Permittee shall maintain records of any additional inspections prescribed by the Continuous Compliance Plan.~~
- ~~(c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.~~

SECTION D.32

FACILITY OPERATION CONDITIONS

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

- ~~(a) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6. [326 IAC 8-3-2][326 IAC 8-3-5]~~
 - ~~(b-a) Emergency generators as follows: diesel generators not exceeding 1600 horsepower, including: [326 IAC 6.8-1-2]~~

...
 - ~~(e b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including two (2) hand-turned abrasive blasters, identified as A18 and A19. [326 IAC 6.8-1-2]~~
 - ~~(d c) Cooling towers not regulated under a NESHAP, including [326 IAC 6.8-1-2]:~~

...
 - ~~(d) **Four (4) Safety-Kleen cold cleaner degreasing operations, each with a maximum capacity of 180 gallons of solvent per 12 months.**~~

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

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

D.32.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.32.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

D.32.3 PM₁₀ Emission Limitations [326 IAC 6.8-2-27]

D.32.4 Particulate Matter (PM) [326 IAC 6-3-2]

Comment 3:

Correct line (g) in the Technical Support Document. There are two (2) 250 gallon diesel fuel storage tanks used for plant equipment.

Response to Comment 3:

IDEM, OAQ acknowledges the addition of a 250 gallon diesel fuel tank. This unit is an insignificant activity and has no applicable requirements. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 4:

Correct the words "Linde SP". We are no longer part of the Linde Division. We are Praxair since 1992.

Response to Comment 4:

IDEM, OAQ acknowledges this change. There are no references to the Linde Division in the permit. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

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. IDEM, OAQ has decided to add the specific mail codes (MC) for each of the IDEM branches to improve mail delivery, as follows:

Permits Branch: **MC 61-53 IGCN 1003**
Compliance Branch: **MC 61-53 IGCN 1003**
Air Compliance Section: **MC 61-53 IGCN 1003**
Compliance Data Section: **MC 61-53 IGCN 1003**
Asbestos Section: **MC 61-52 IGCN 1003**
Technical Support and Modeling: **MC 61-50 IGCN 1003**

2. IDEM, OAQ has corrected Section A.1 of the permit to reflect the correct source status as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates four (4) stationary cryogenic air separation plants, identified as Plants 5, 6, 7, and 8, manufacturing industrial gases.

Source Address:	4400 Kennedy Avenue, East Chicago, Indiana 46312
Mailing Address:	4400 Kennedy Avenue, East Chicago, Indiana 46312
General Source Phone Number:	(219) 391-5201
SIC Code:	2813
County Location:	Lake
Source Location Status:	Nonattainment for PM _{2.5} , SO₂ , and 8-hour ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD and Emission Offset Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit Renewal

Source Background and Description

Source Name:	Praxair, Inc.
Source Location:	4400 Kennedy Avenue, East Chicago, Indiana 46312
County:	Lake
SIC Code:	2813
Operation Permit No.:	T089-7989-00330
Operation Permit Issuance Date:	April 23, 2001
Permit Renewal No.:	T089-21430-00330
Permit Reviewer:	ERG/TDP

The Office of Air Quality (OAQ) has reviewed a Part 70 Operating Permit Renewal application from Praxair, Inc. relating to the operation of four (4) cryogenic air separation plants, identified as Plants 5, 6, 7, and 8, which are used to manufacture industrial gases.

Permitted Emission Units and Pollution Control Equipment

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

- (a) Two natural gas-fired boilers, described as follows:
 - (1) Boiler A1, constructed in 1972, with a capacity of 103 million British thermal units per hour (MMBtu/hr), and exhausting to one (1) stack, (identified as S001); and
 - (2) Boiler A2, constructed in 1972, with a capacity of 103 MMBtu/hr, and exhausting to one (1) stack, (identified as S002).
- (b) Three (3) natural gas-fired regeneration heaters, described as follows:
 - (1) Process Heater A4, constructed in 1971, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S004-A through D);
 - (2) Process Heater A5, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S005-A through D); and
 - (3) Process Heater A6, constructed in 1973, with a capacity of 10.8 MMBtu/hr, and exhausting to four (4) stacks, (identified as S006-A through D).
- (c) One (1) No. 2 emergency fuel-fired generator, identified as A16, constructed in July 1996, with a capacity of 6.2 MMBtu/hr, 500 kw unit, and exhausting to one (1) stack, (identified as S016).
- (d) One (1) paint spray booth, (identified as A14), constructed in 1971, with a metal cylinder for painting, using air atomization spray guns, with a maximum capacity of 16.4 pounds of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack, (identified as S033).

Unpermitted Emission Units and Pollution Control Equipment

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

Insignificant Activities

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: space heaters.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, with total capacity of equipment operated not exceeding 2,000,000 Btu/hr.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (d) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, and not subject to 326 IAC 20-6. [326 IAC 8-3-2] [326 IAC 8-3-5]
- (f) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (g) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment using less than 625 lbs of wire per day. [326 IAC 6.8-1]
- (h) Closed loop heating and cooling systems.
- (i) Heat exchanger cleaning and repair.
- (j) Process vessel degassing and cleaning to prepare for internal repairs.
- (k) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (l) 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.
- (m) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (n) Emergency generators as follows: diesel generators not exceeding 1600 horsepower, including: [326 IAC 6.8-1-2]
 - (1) Emergency Generator A7, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S007-A through B.
 - (2) Emergency Generator A8, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S008-A through B.
 - (3) Emergency Generator A9, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S009-A through B.

- (4) Emergency Generator A10, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stacks S010-A through B.
- (5) Emergency Generator A11, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S011.
- (6) Emergency Generator A12, with a capacity of 6.2 MMBtu/hr, 500 kw/hr, and exhausting to stack S012.
- (o) Other emergency equipment as follows: stationary fire pumps.
- (p) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate of less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations, including two (2) hand-turned abrasive blasters, identified as A18 and A19. [326 IAC 6.8-1-2]
- (q) Purge double block and bleed valves.
- (r) Filter or coalescer media changeout.
- (s) Activities with emissions of volatile organic compounds less than 3 lbs/hour or 15 lbs/day, PM and PM₁₀ less than 5 lbs/hour or 25 lbs per day, and HAPs less than 5 lbs /day or 1 ton/yr for any single HAP and 12.5 lbs/day or 2.5 tons/year after total HAPs, including:
 - (1) Storage tanks, including:
 - (a) 600-gallon fuel oil storage tank to feed the six (6) emergency generators.
 - (b) Six (6) diesel fuel oil storage tanks each with a capacity less than 300-gallons.
 - (c) One (1) 1,000 gallon fuel oil storage tank to feed the Hydrogen Plant Generator day tank.
 - (d) One (1) 1,500 gallon used lube oil storage tank for used oil from the process compressors.
 - (e) Two (2) 280 gallon motor oil storage tanks for tractor motor oil.
 - (f) Two (2) 336 gallon portable oil storage tanks used for compressor lube oil.
 - (g) One (1) 250 gallon gasoline storage tank used for plant mobile equipment.
 - (h) One (1) 5,000 gallon fuel oil storage tank.
 - (i) One (1) 12,000 gallon diesel fuel storage tank used to store fuel for semi-tractors.
 - (j) One (1) 5,000 gallon storage tank used to store sulfuric acid for cooling tower water treatment.
 - (2) Cooling towers not regulated under a NESHAP, including [326 IAC 6.8-1-2]:

- (a) One (1) direct-contact cooling tower with a flowrate of 51,000 gpm of water, and less than 25 lbs/day particulate emissions.
- (b) One (1) direct-contact cooling tower with a flowrate of 40,000 gpm of water, and less than 25 lbs/day particulate emissions.
- (c) One (1) direct-contact cooling tower, with a flow rate of 10,000 gpm of water and less than 25 lbs/day particulate emissions.

Existing Approvals

The source has been operating under Part 70 Operating Permit No. T089-7989-00330, issued on April 23, 2001, and the following previous approvals:

- (a) First Administrative Amendment 089-14529-00330, issued October 9, 2001; and
- (b) Second Administrative Amendment 089-14970-00330, issued January 29, 2002.

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

The following terms and conditions from previous approvals have been revised in this Part 70 permit:

Condition D.1.3, D.2.1, and D.3.2; Particulate Matter Limitations [326 IAC 6-1-2]: Pursuant to 326 IAC 6-1-2(b)(5), no fossil fuel combustion steam generators, such as A1 and A2, shall discharge or cause to be discharged any gases unless such gases are limited to a particulate matter content of no greater than 0.01 grains per dry standard cubic foot for all gaseous fuel-fired steam generators.

Reason for revision: 326 IAC 6-1 has been recodified. The requirements for Praxair have been moved under 326 IAC 6.8-1 (Lake County: PM₁₀ Emission Requirements). Emission units at this facility have been specifically identified under 326 IAC 6.8-2-27 (formerly 326 IAC 6-1-10.1(d)(33)), and 326 IAC 6.8-6-14 (Particulate Matter Limitations for Lake County) (formerly 326 IAC 6-1-10.1(h)). Therefore, the limits for these specified emission units have been incorporated into this Title V Renewal.

The following terms and conditions from previous approvals have been determined no longer applicable; and therefore, were not incorporated into this Part 70 permit:

Condition D.1.2; SO₂ Minor Limit: Boilers A1 and A2: (a) shall each burn No. 2 fuel oil with a maximum weight percent sulfur (S) of 0.096% which will result in SO₂ emissions less than 10 pounds per hour, (b) shall each limit No.2 fuel oil input to less than 3,668 kilogallons per year, which will result in SO₂ emissions less than 25 tons per year. Compliance with both D.1.2(a) and (b) will render the requirements of 326 IAC 7-1.1-1 inapplicable. 326 IAC 7-1.1 is not federally enforceable.

Reason not incorporated: Praxair has permanently disconnected the No. 2 fuel oil feed to the boilers. Boilers A1 and A2 will only burn natural gas and will no longer burn diesel fuel. Note that pursuant to 326 IAC 6.8-6-1, combustion source located in Lake County and listed in 326 IAC 6.8-6-14 are required to fire only natural gas. Therefore, the SO₂ minor limit is no longer applicable to these units and has been deleted from the permit. Subsequently, Conditions D.1.4(b) (SO₂ Emissions), D.1.5 (Sulfur Dioxide Emissions and Sulfur Content), D.1.6 (Visible Emission Notations), and D.1.7(d) and (e) have been removed. Condition D.1.8 has been revised to remove the reference to D.1.2.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit renewal be approved. This recommendation is based on the following facts and conditions:

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

An administratively complete Part 70 permit renewal application for the purposes of this review was received on July 12, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 8).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	37.1
PM-10	37.1
SO ₂	6.1
VOC	22.0
CO	96.9
NO _x	301.52

HAPs	tons/year
Hexane	1.62
Total	1.98

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x is greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD Part 70, and Emission Offset applicability.

Potential to Emit of the Source after Issuance

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."

The source was issued a Part 70 Operating Permit on April 23, 2001. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the original Part 70 operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Boilers A1 and A2 ^(a)	6.9	6.9	0.50	5.0	75.8	253	1.7
Regeneration Heaters A4, A5, and A6 ^(a)	1.1	1.1	0.1	0.8	129	14.2	0.27
Emergency generators A7, A8, A9, A10, A11, and A12 ^(b)	0.93	0.93	4.7	0.84	7.91	29.8	Negligible
Generator A16	0.16	0.16	0.78	0.14	1.32	4.96	Negligible
Spray Paint Booth A14 ^(c)	1.40	1.40	0.0	14.4	0.0	0.0	0.0
Total PTE	4.85	10.6	6.39	19.9	215	304	1.9

^(a) PM₁₀ emissions from these units are limited by 326 IAC 6.8-6-14.

^(b) PM₁₀ emissions from generators A7, A8, A9, A10, A11 and A12 are limited by 326 IAC 6.8-2-27.

^(c) Particulate emissions from the spray booth are limited by 326 IAC 6.8-2-27.

- (a) This existing stationary source is major for PSD because the emissions of at least one attainment pollutant are greater than two hundred fifty (>250) tons per year, and is not one of the twenty-eight (28) listed source categories.
- (b) This existing stationary source is major for Emission Offset because the emissions of the nonattainment pollutant, NO_x, are greater than one hundred (>100) tons per year.
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2003 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM10	0
PM2.5	0
SO ₂	0
VOC	0
CO	1
NO _x	2
HAP	--

-- No information available.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Maintenance Attainment
PM 2.5	Nonattainment
SO ₂	Attainment
NO ₂	Nonattainment
8-hour Ozone	Moderate Nonattainment
CO	Maintenance
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

- (a) U.S. EPA in Federal Register Notice 70 FR 943 dated January 5, 2005 has designated Lake County as nonattainment for PM_{2.5}. 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 a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability-Entire Source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake 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.
- (c) Lake County has been classified as attainment or unclassifiable in Indiana for Lead, CO, NO₂, and PM₁₀. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability-Entire Source section.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in this permit. This source does not have any emissions units, as defined in 40 CFR 64.1:
 - (1) with the potential to emit before controls equal to or greater than the major source threshold, for any regulated pollutant;
 - (2) that is subject to an emission limitations or standard for the regulated pollutant; and
 - (3) uses a control device as defined in 40 CFR 64.1 to comply with the emission limitation or standard.
- (b) The requirements of New Source Performance Standard, 40 CFR 60, Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971 (326 IAC 12), are not included in this permit. The two natural-gas fired boilers, identified as A1 and A2, have a heat input rate of less than 250 million British thermal units per hour.
- (c) The requirements of New Source Performance Standard, 40 CFR 60 Subpart Da - Standards of Performance for Electric Utility Steam Generating Units (40 CFR 60.40a and 326 IAC 12), are not included in this permit. The two natural-gas fired boilers, identified as A1 and A2, are not electric utility steam generators and were constructed in

1972, (prior to the September 18, 1978 applicability date), and have heat input capacities less than 250 MMBtu/hour (therefore, this NSPS does not apply).

- (d) The requirements of New Source Performance Standard, 40 CFR 60, Subpart Db, Subpart Db), Standards of Performance for Industrial-Commercial-Institutional Steam Generators (40 CFR 60.40b and 326 IAC 12), are not included in this permit. The two natural gas-fired boilers, identified as A1 and A2, were constructed in 1972, which is prior to the June 19, 1984 applicability date.
- (e) The requirements of New Source Performance Standard, 40 CFR 60, Subpart Dc - Standards of Performance for Industrial-Commercial-Institutional Steam Generators (40 CFR 60.40c and 326 IAC 12), are not included in this permit. The two natural-gas fired boilers, identified as A1 and A2, were constructed in 1972, which is prior to the June 9, 1989 applicability date, and each boiler has a heat input capacity of greater than 100 million British thermal units per hour.
- (f) The requirements of New Source Performance Standard, 40 CFR 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978 (40 CFR 60.110 and 326 IAC 12), are not included in this permit. All storage tanks located at this source have a capacity less than 40,000 gallons. Therefore, this NSPS does not apply.
- (g) The requirements of New Source Performance Standard, 40 CFR 60, Subpart Ka- Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984 (40 CFR 60, and 326 IAC 12), are not included in this permit. All storage tanks located at this source have a capacity less than 40,000 gallons. Therefore, this NSPS does not apply.
- (h) The requirements of New Source Performance Standard, 40 CFR 60, Subpart Kb- Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, are not included in this permit. All storage tanks located at this source have a capacity less 75 cubic meters (19,813 gallons). Therefore, this NSPS does not apply.
- (i) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.
- (j) The requirements of 40 CFR Part 63, Subpart T-National Emission Standards for Halogenated Solvent Cleaning (326 IAC 20-6) are not included in this permit. This source does not use solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform in their degreasers.
- (k) The requirements of 40 CFR Part 63, Subpart DDDDD-National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers, and Process Heaters are not included in this permit. This NESHAP applies only to process heaters and boilers located at sources that are major sources of hazardous air pollutant (HAPs). This source is a minor source of HAPs.
- (l) The requirements of 40 CFR Part 63, Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (326 IAC 20-82) are not included in this permit. This rule applies to reciprocating internal combustion engines (RICE) located at a major source of HAP emissions. This source is not a major source of HAP emissions.
- (m) The requirements of 40 CFR Part 63, Subpart Q – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers (326 IAC 20-4) are not included in this permit. This NESHAP applies to cooling towers that are operated with

chromium-based water treatment chemicals. This source does not use chromium-based water treatment chemicals in its water towers.

- (n) The requirements of 40 CFR Part 63, Subpart M-MMM-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products are not included in this permit. This NESHAP applies to surface coating of metal parts and products located at sources that have potential HAP emissions greater than the major source threshold. This source is not a major source of HAP emissions.

State Rule Applicability – Entire Source

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

This source is located in Lake County and is not in one of the twenty-eight listed source categories. Most of the emission units located at this source were constructed prior to the promulgation of the Prevention of Significant Deterioration (PSD) and Non-Attainment Area New Source Review regulations. The NO_x emissions from the source are greater than 250 tons per year, therefore, this source is a major source under 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) for ozone.

The only significant modification to this source occurred in 1996 when the source installed a new emergency generator. This generator, which is identified as Unit A16, is fueled by No. 2 fuel oil and has a capacity of 6.2 MMBtu per hour. Construction and operation of this emergency generator was permitted under CP 089-5356-00330, issued on July 23, 1996. At the time of construction of generator A16, the portion of Lake County in which this source is located was designated attainment for NO₂ and lead, but nonattainment for PM₁₀, SO₂, CO, and the 1-hour ozone standard. The potential to emit NO_x from the entire source prior to the construction of generator A16 was greater than 250 tons per year; the potential to emit PM, SO₂, and CO were less than 100 tons per year; and the potential to emit VOC was less than 25 tons per year. Therefore, the source was a major source under 326 IAC 2-2 (PSD) and a minor source under 326 IAC 2-3 (Emission Offset). Note that the U.S. EPA granted a waiver on January 26, 1996 to the requirements of Section 182 (f) of the Clean Air Act. Therefore, only VOC was considered when evaluating the applicability of 326 IAC 2-3 (Emission Offset) relating to the 1-hour ozone standard.

The potential emission increases from the construction of the generator are 120 tons of NO_x per year, 26 tons of CO per year and less than 10 tons of PM, PM₁₀, SO₂ and VOC per year, assuming the generator operated at its maximum capacity of 8,760 hours per year. Due to the increase in NO_x emissions, the modification triggered the requirements of 326 IAC 2-2 (PSD). However, construction permit 089-5356-00330 issued July 23, 1996 included a limit on the maximum number of operating hours this emergency generator could be operated each year which limited the NO_x emissions to less than the 40 ton per year PSD threshold and made the requirements of 326 IAC 2-2 not applicable. This limit of 697 operating hours per year was incorporated into the source's Title V permit. This limit has been removed as the potential to emit of the emergency generator is based on 500 hours of operation as pursuant to U.S. EPA.

In January 2000, Lake County was redesignated as maintenance attainment for CO. In 2001 during the drafting of the initial Title V permit, the source requested permission to burn fuel oil No. 2 in boilers A1 and A2 as a back up fuel. Although this modification would have triggered Emission Offset review due to the increase in SO₂ emissions associated with burning fuel oil, the source accepted limits on the sulfur content and the amount of fuel oil burned. These limits made the emission offset requirements not applicable to this modification. The source has recently requested this limit not be included in the Title V permit renewal because the company no longer plans to use No. 2 fuel oil as a backup fuel and has permanently disconnected the No. 2 fuel pipeline to these units (see discussion on page 4 of this document). No other modifications to this source occurred after the date of issuance of the initial Title V permit on April 23, 2001.

Lake County is currently designated as attainment for PM₁₀, NO₂, CO, SO₂ and lead and nonattainment for PM_{2.5} and 8-hour ozone standards. This county is designated as primary attainment for SO₂, severe nonattainment for the 1-hour ozone standard, and moderate nonattainment for the 8-hour ozone standard. The U.S. EPA has not granted a waiver for Section

182(f) of the Clean Air Act; therefore, VOC and NO_x emissions are considered when evaluating the applicability of 326 IAC 2-3 for the 8-hour ozone standard. Since the potential to emit NO_x from the entire source is approximately 304 tons per year; this source is a major source under both PSD and Emission Offset for ozone.

326 IAC 6.8-10-1 (Lake County: Fugitive Particulate Matter)

This source is subject to 326 IAC 6.8-10-1 (Lake County: Fugitive Particulate Matter) because the source is located in Lake County and the Linde SP (Rare Gas) plant and the Oxygen (Air Separation and Liquid Hydrogen) Plant are located at the East Chicago facility and specifically identified in 326 IAC 6.8-10-1(a)(2)(P) and (Q). Pursuant to 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

- (a) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
- (b) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
- (c) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
- (d) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
- (e) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
- (f) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.
- (g) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
- (h) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
- (i) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan. The Permittee submitted a Fugitive Dust Control Plan on June 27, 2006, which is included as Attachment A to the permit.

325 IAC 6-5 (Particulate Matter Limitations Except Lake County)

This source is not subject to 325 IAC 6-5 (Particulate Matter Limitations Except Lake County) because the source is located in Lake County which is exempt under 326 IAC 6-5-1(a).

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is not subject to 326 IAC 8-6 (Organic Solvent Emission Limitations) because the source has a potential to emit of VOC less than one hundred (100) tons per year.

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

This source is not subject to 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties) because the source has a potential to emit of VOC less than twenty-five (25) tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program and it has the potential to emit NOx greater than or equal to 25 tons per year, and is located in Lake County. Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6 annually because it has a potential to emit NOx greater than or equal to 25 tons per year and is located in Lake County. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6.

326 IAC 5-1 (Opacity Limitations)

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

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

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

This source does not have the potential to emit greater than 10 tons per year of single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Two (2) Natural Gas-Fired Boilers A1 and A2 and Three (3) Regeneration Heaters

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The two (2) natural gas-fired boilers, identified as A1 and A2, and the three (3) regeneration heaters, identified as A4, A5, and A6, are subject to the requirements of 326 IAC 6.8-6 (Lake County, Combustion Sources; Natural Gas), because these facilities are specifically identified in 326 IAC 6.8-6-14 (Praxair). Pursuant to 326 IAC 6.8-6-14, the PM₁₀ emission rate from the two boilers, identified as A1 and A2, shall not exceed 0.618 pounds per hour and 0.003 pounds per MMBtu, and the PM₁₀ emission rate from the three regeneration heaters, identified as A4, A5, and A6, shall not exceed 0.097 pounds per hour and 0.003 pounds per MMBtu.

The two boilers and three regeneration heaters are not subject to 326 IAC 6.8-3 (Opacity, Exceptions to 326 IAC 5-1-2) because these units are not included in 326 IAC 6.8-3-2, 326 IAC 6.8-3-3 or 326 IAC 6.8-3-4.

The boilers and regeneration heaters are not subject to 326 IAC 6.8-5 (Lake County: Opacity Continuous Emission Monitors), because these facilities are not specifically identified in 326 IAC 6.8-5.

The boilers and regeneration heaters are not subject to 326 IAC 6.8-7 (Lake County: Site-Specific Control Requirements), because these facilities are not specifically identified in 326 IAC 6.8-7.

The boilers and regeneration heaters are not subject to the requirements of 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan). Pursuant to 326 IAC 6.8-8-1(21)(A), facilities configured to burn only natural gas are exempt.

The two natural gas-fired boilers (A1 and A2) and the three regeneration heaters (A4, A5, and A6) are not subject to 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2) because these units are specifically listed in 326 IAC 6.8-6-14.

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

The two natural gas-fired boilers, identified as A1 and A2, and the three regeneration heaters, identified as A4, A5, and A6, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Since particulate emissions from the boilers and regeneration heaters are subject to the requirements of 326 IAC 6.8-1, these facilities exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

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

The two natural gas-fired boilers, identified as A1 and A2, are subject to the requirements of 326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating). However, pursuant to 326 IAC 6-2-1(e), if the limitations of 326 IAC 6-2 are inconsistent with applicable limitations contained in 326 IAC 6-1 (recodified under 326 IAC 6.8-1), then the limitations contained in 326 IAC 6-1 (recodified under 326 IAC 6.8-1) shall prevail. Since particulate emissions from the boilers and regeneration heaters are subject to the requirements of 326 IAC 6.8-1, these facilities are exempt from the requirements of 326 IAC 6-2-1.

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

The natural gas fired boilers, identified as A1 and A2, are not subject to the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), because the potential to emit sulfur dioxide from these units does not exceed twenty-five (25) tons per year or ten (10) pounds per hour.

State Rule Applicability – Seven (7) Emergency Generators

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The six natural gas-fired emergency generators identified as A7, A8, A9, A10, A11, and A12 are specifically identified in 326 IAC 6.8-2-27 (Praxair) (formerly 326 IAC 6-1-10.1(d)(33)). Pursuant to this rule, the particulate emission rate from the six natural gas-fired generators shall not exceed 0.279 lbs of PM₁₀ per hour and 0.008 lbs/MMBtu.

The generator identified as A16 is not listed in 326 IAC 6.8-2-27 and the source does not have the potential to emit greater than 100 tons of particulate per year or actual emissions greater than 10 tons per year. Therefore, A16 is not subject to 326 IAC 6.8-1-2.

The generators are not subject to 326 IAC 6.8-3 (Opacity, Exceptions to 326 IAC 5-1-2) because these facilities are not specifically identified by this rule.

The generators are not subject to 326 IAC 6.8-5 (Lake County: Opacity Continuous Emission Monitors), because these facilities are not specifically identified by this rule.

The generators are not subject to 326 IAC 6.8-7 (Lake County: Site-Specific Control Requirements), because these facilities are not specifically identified by this rule.

The generators are not subject to the requirements of 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan). Pursuant to 326 IAC 6.8-8-1(21)(A), facilities configured to burn only natural gas are exempt.

The generators A7, A8, A9, A11 and A12 are not subject to the requirements of 326 IAC 6.8-1-2 (formerly 326 IAC 6-1-2) because they are subject to the requirements of 326 IAC 6.8-6-14 (formerly 326 IAC 6-1-10.1(d)(33)).

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

(a) The generators A7, A8, A9, A11 and A12 are not subject to the requirements of 326 IAC 6-3 because they are subject to the requirements of 326 IAC 6.8 (formerly 6-1). Emission units that are subject to the requirements of 326 IAC 6-1 are exempt from the requirements of 326 IAC 6-3 by 326 IAC 6-3-1(c)(3). The generators are exempt from the requirements of this rule.

- (b) Since the generator identified as A16 is not subject to the requirements of 326 IAC 6.8-1, it is subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from the generator A16 shall not exceed five hundred fifty-one thousandths (0.551) pound per hour.

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

The emergency generators are not subject to the requirements of 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), because the potential to emit sulfur dioxide from these units does not exceed twenty-five (25) tons per year or ten (10) pounds per hour.

State Rule Applicability – Surface Coating Operations

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The cylinder paint booth identified as A14 is subject to 326 IAC 6.8-1-2 (Particulate Matter Limitations for Lake County), because the source is located in Lake County, and the facilities are specified in 326 IAC 6.8-2-27 (Praxair). Pursuant to 326 IAC 6.8-2-27 (Praxair), the PM₁₀ emission rate from the cylinder paint booth identified as A14 shall not exceed 0.340 lbs per hour and 42.5 lbs/ton.

The cylinder paint booth is not subject to 326 IAC 6.8-3 (Opacity, Exceptions to 326 IAC 5-1-2) because the facility is not specifically identified in 326 IAC 6.8-3.

The cylinder paint booth is not subject to 326 IAC 6.8-5 (Lake County: Opacity Continuous Emission Monitors), because the facility is not specifically identified in 326 IAC 6.8-5.

The cylinder paint booth is not subject to 326 IAC 6.8-7 (Lake County: Site-Specific Control Requirements), because the facility is not specifically identified in 326 IAC 6.8-7.

The cylinder paint booth is subject to the requirements of 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan), because the total uncontrolled PM from this source exceeds ten (10) tons per year and this facility is listed in 326 IAC 6.8-2-27.

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

The cylinder paint booth identified as A14 is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Since particulate emissions from the cylinder paint booth are subject to the requirements of 326 IAC 6.8-1 (Nonattainment Area Particulate Limitations), the cylinder paint booth is exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The cylinder paint booth, identified A14, is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because this facility existed as of July 1, 1990, is located in Lake County, and has a potential to emit VOC in excess of fifteen (15) pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-9, the Permittee shall not allow the discharge into the atmosphere VOC in excess of three and five-tenths (3.5) pounds of VOC per gallon of coating, excluding water, as delivered to the applicator, for air dried coatings.

Pursuant to 326 IAC 8-2-9(f), all solvents sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

Based on information provided by the source and the calculations provided in Appendix A to this document, the spray paint booth can comply with the VOC content limits in 326 IAC 8-2-9.

State Rule Applicability – Insignificant Degreasing Operations

326 IAC 8-3-2 (Cold Cleaner Operations)

Pursuant to 326 IAC 8-3-1(a)(2), the degreasing operations are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) because they were constructed after January 1, 1980.

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) 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.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operations and Control)

Pursuant to 326 IAC 8-3-1(b)(1), the cold cleaner degreasers are located in Lake County, were existing as of July 1, 1990 and do not have remote solvent reservoirs. Therefore, they are subject to 326 IAC 8-3-5 (Cold Cleaner Degreaser Operations and Control).

- (a) Pursuant to 326 IAC 8-3-5(a), for cold cleaner degreaser operations without remote solvent reservoirs constructed after July 1, 1990, the Permittee shall ensure that the following control equipment requirements are met:
 - (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.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), for a cold cleaning facility construction of which commenced after July 1, 1990, the Permittee shall ensure that the following operating requirements are met:
- (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.

State Rule Applicability - Two (2) Abrasive Blasters, A18 and A19

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The two abrasive blasters, identified as A18 and A19, are subject to 326 IAC 6.8, because these units are specified in 326 IAC 6.8-2-27 (Praxair). Pursuant to this rule, the PM₁₀ emission rate from the drum abrasive blaster A18 shall not exceed 0.028 lbs per hour and 0.002 grains per dry standard cubic foot, and the PM₁₀ emission rate from the cylindrical abrasive blaster A19 shall not exceed 0.020 lbs per hour and 0.002 grains per dry standard cubic foot.

The abrasive blasters are not subject to 326 IAC 6.8-3 (Opacity, Exceptions to 326 IAC 5-1-2) because these facilities are not specifically identified in 326 IAC 6.8-3-2, 326 IAC 6.8-3-3, or 326 IAC 6.8-3-4.

The two abrasive blasters are not subject to 326 IAC 6.8-5 (Lake County: Opacity Continuous Emission Monitors), because these facilities are not specifically listed in 326 IAC 6.8-5.

The abrasive blasters are not subject to 326 IAC 6.8-7 (Lake County: Site-Specific Control Requirements), because the facility is not specifically identified within this rule.

The abrasive blasters are not subject to the requirements of 326 IAC 6.8-8 (Lake County: Continuous Compliance Plan), because the total uncontrolled PM from this source does not exceed ten (10) tons per year.

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

The two abrasive blasters, A18 and A19, are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Since particulate emissions from the two abrasive blasters are subject to the requirements of 326 IAC 6.8-1, the abrasive blasters are exempt from the requirements of 326 IAC 6-3-2, pursuant to 326 IAC 6-3-1(c)(3).

State Rule Applicability – Insignificant Brazing Equipment, Cutting Torches, Soldering Equipment, Welding Equipment

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

The brazing, cutting, soldering, and welding equipment are not subject to 326 IAC 6.8, because these units are not specified in 326 IAC 6.8-2-27 (Praxair), and the source does not have the potential to emit 100 tons particulate per year or actual emissions greater than 10 tons per year.

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

The welding equipment is not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), because the welding equipment uses less than 625 lbs of wire or rod per day.

State Rule Applicability – Insignificant Gasoline Transfer Operations and Petroleum Liquid Storage Facilities

326 IAC 8-4 (Petroleum Sources)

The insignificant gasoline fuel transfer and dispensing operation and the insignificant fuel oil storage tanks are not subject to 326 IAC 8-4 (Petroleum Sources) because the petroleum liquid storage vessels have a maximum capacity of less than 39,000 gallons, and the gasoline fuel transfer operation is used for diesel fuel.

State Rule Applicability – Direct Contact Cooling Towers

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

The three (3) direct contact cooling towers are not subject to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes). Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from each of the three (3) direct contact cooling towers shall not exceed five-hundred fifty one-thousandths (0.551) lbs per hour each.

326 IAC 6.8-1-2(formerly 326 IAC 6-1-2) (Particulate Matter Limitations for Lake County)

The three (3) direct contact cooling towers are not subject to 326 IAC 6.8-1-2 because these units are not specified in 326 IAC 6.8-2-27 (Praxair), and the source does not have the potential to emit 100 tons particulate per year or actual emissions greater than 10 tons per year.

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: Compliance Determination Requirements and Compliance Monitoring Requirements.

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

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack S033 while one or more of the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to

Excursions or Exceedances, shall be considered a deviation from this permit. Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C – Response to Excursions or Exceedances, shall be considered a deviation from this permit.

Conclusion

The operation of the four (4) stationary cryogenic air separation plants, identified as plants 5, 6, 7, and 8 used to manufacture industrial gases, shall be subject to the conditions of this Part 70 permit 089-21430-00330.

**Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100**

Two Natural Gas Fired Boilers Identified as A1 and A2

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

Heat Input Capacity
MMBtu/hr

206.0 (2 units)

Potential Throughput
MMCF/yr

1804.6

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	280.0	5.5	84.0
Potential Emission in tons/yr	6.9	6.9	0.5	252.6	5.0	75.8

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 280 lb/MMCF (pre-NSPS).

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission factors from AP-42, Chapter 1.4, Tables 1.4-1 and 1.4-2, SCC #1-01-006-01, 1-01-006-04

(AP-42 Supplement D 3/98)

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

See next page for HAPs emissions calculations.

Appendix A: Emission Calculations
Natural Gas Combustion Only
MMBTU/HR >100
Two Natural Gas Fired Boilers Identified as A1 and A2
HAPs Emissions

Company Name: Praxair, Inc.

Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312

Permit Number: T089-21430-00330

Reviewer: ERG/TDP

Date: March 29, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.89E-03	1.08E-03	6.77E-02	1.62E+00	3.07E-03

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	4.51E-04	9.93E-04	1.26E-03	3.43E-04	1.89E-03

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

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

Three (3) Natural Gas Regeneration Heaters Identified as A4, A5, and A6

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
32.4	(3 units)
	283.8

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission in tons/yr	1.1	1.1	0.1	14.2	0.8	11.9

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100 lb/MMCF.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

See next page for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Three (3) Natural Gas Regeneration Heaters Identified as A4, A5, and A6
HAPs Emissions

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	2.980E-04	1.703E-04	1.064E-02	2.554E-01	4.825E-04

HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	7.096E-05	1.561E-04	1.987E-04	5.393E-05	2.980E-04

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above., from AP-42, Chapter 1.4, Table 1.4-3. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
One (1) No.2 Emergency Oil-fired Generator, Identified as A16**

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 4631
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

A. Emissions calculated based on heat input capacity (MMBtu/hr)

Heat Input Capacity
MM Btu/hr

6.2

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
0.1	0.1	0.1	0.51	3.20	0.1	0.85
Potential Emission in tons/yr**	0.16	0.16	0.78	4.96	0.14	1.32

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

Methodology

Potential Throughput (hp-hr/yr) = hp * 697 hr/yr

Emission Factors are from AP42 (Supplement B 10/96), Table 3.4-1

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 697 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

**Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Six (6) No.2 Oil-fired Emergency Generators, Identified as
A7, A8, A9, A10, A11, and A12**

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

A. Emissions calculated based on heat input capacity (MMBtu/hr) and 500 hours/year operation per emergency generator

Heat Input Capacity
MM Btu/hr

37.2 (6 units)

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2**	NOx	VOC	CO
	0.1	0.1	0.51	3.20	0.1	0.85
Potential Emission in tons/yr	0.93	0.93	4.70	29.76	0.84	7.91

Methodology

Potential Throughput (hp-hr/yr) = hp * 500 hr/yr

Emission Factors are from AP-42 (Supplement B 10/96), Table 3.4-1

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 500 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

**Assume Sulfur Content of 0.5%

Note: As defined in the September 6, 1995 memorandum from John S. Seitz of US EPA on the subject of "Calculating Potential to Emit for Emergency Generators", an emergency generator's sole function is to provide back-up power when power from the local utility is interrupted. The only circumstances under which an emergency generator would operate when utility power is available are during operator training or brief maintenance checks. The generator's potential to emit is based on an operating time of 500 hours per year as set forth in the EPA memo.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Lb. of Mat. (lb/hour)	Pounds VOC per gallon of coating less water	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Uncontrolled Particulate Potential (ton/yr)	Controlled Particulate Potential (tons/yr)	Transfer Efficiency
Coppertone Ad Enamel	0.976	20.00%	0.0%	20.0%	0.0%	0.00%	16.40000	0.20	3.28	78.72	14.37	28.05	1.40	50%

The material used in the surface coating operation does not contain HAPs.

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
 Potential VOC Pounds per Hour = Weight % Organics * Maximum Lb of Material (lb/hour)
 Potential VOC Pounds per Day = Weight % Organics * Maximum Lb of Material (lb/hour) * (24 hr/day)
 Potential VOC Tons per Year = Weight % Organics * Maximum Lb of Material (lb/hour) * (8760 hr/yr) * (1 ton/2000 lbs)
 Particulate Potential Tons per Year = (lb material/hour) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)

**Appendix A: Emissions Calculations
VOC from Degreasing Operations**

Company Name: Praxair, Inc.
Address : 4400 Kennedy Avenue, East Chicago, Indiana 46312
Permit Number: T089-21430-00330
Reviewer: ERG/TDP
Date: March 29, 2007

Material	Density (Lb/Gal)	Weight % Volatile Organics	Gal of Mat. (gal/year)	Potential VOC pounds per year	Potential VOC tons per year
Safety Kleen Premium Solvent	6.800	100.00%	145.00000	986.00	0.49
Safety Kleen 105 Solvent Recycled	6.700	100.00%	145.00000	971.50	0.49
Crystal Simple Green	8.500	0.00%	145.00000	0.00	0.00

The materials used in degreasing do not contain HAPs.

Total PTE VOC (tons/yr): 0.98

METHODOLOGY

Potential VOC Pounds per Year = Weight % Organics * Max. Gal of Material (lb/year) * Density (Lb/Gal)

Potential VOC Tons per Year = Weight % Organics * Max. Gal of Material (lb/year) * Density (Lb/Gal) * (1 ton/2000 lb)

Attachment A

PRAXAIR PARTICULATE MATTER CONTROL PLAN

June 27, 2006

Locations listed in the Title V Permit: (adjacent)

Praxair
4400 Kennedy Avenue
East Chicago, IN 46312

and

Praxair
4550 Kennedy Avenue
East Chicago, IN 46312

Owner:

Praxair
39 Old Ridgebury Road
Danbury, CT. 06810

Operations:

- ShotBlasters and Paint Booths are NOT in use at Praxair East Chicago IN
- Package boilers (2 units) 0.003 lbs/MMBtu 0.618
- Plants numbers 6, 7, and 8 regenerator heaters 0.003 lbs/MMBtu 0.097

Facility Map and General Information:

- A facility map shows Paved, Grassy and Unpaved areas.
- The road lengths and widths vary throughout the facility. Typical in between plant roads have lengths of several hundred feet and widths of 16-20 feet, where parking areas for trucks are paved for several hundred feet.
- Less than 200 people are on site at any given time at these Praxair locations. Traffic is minimal typically with less than 50 vehicles coming and going during daytime hours and less than 20 on off hours and weekends.
- Praxair produces Atmospheric Gases and stores liquefied gases in storage tanks and in trucks. There are no permanent dust producing piles or material handling processes.

Control Measures:

- Control Measures are take on an as needed basis for the control of dust on roadways.
- Throughout the plant are fire hydrants which can supply ample water for washing down roadways and parking lots as needed.
- Additionally, a Truck Wash bay is periodically used on site to wash down trucks and service vehicles that may come on site that are dusty, dirty.

