



*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: March 17, 2006  
RE: Dover Chemical Corp / 089-21470-00227  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification 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 13-15-7-3 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit 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.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Mitchell E. Daniels Jr.  
Governor

Thomas W. Easterly  
Commissioner

100 North Senate Avenue  
Indianapolis, Indiana 46204-2251  
(317) 232-8603  
(800) 451-6027  
[www.In.gov/idem](http://www.In.gov/idem)

Mr. Jack Hamner  
Dover Chemical Corporation – Hammond Works  
3000 Sheffield Avenue  
Hammond, IN 46327

March 17, 2006

Re: 089-21470-00227  
Second Significant Permit Modification to  
Part 70 Permit No.: 089-7797-00227

Dear Mr. Hamner:

Dover Chemical Corporation – Hammond Works was issued a Part 70 permit on March 19, 2004 for a chlorinated paraffin manufacturing plant. An application to modify the permit was received by the Office of Air Quality (OAQ) on July 15, 2005. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification includes the addition of enforceable permit conditions to their Title V permit limiting source-wide HAP emissions below major thresholds, and the deletion of all conditions in Section D.2 relating to 40 CFR 63, Subpart NNNNN applicability.

All other conditions of the permit shall remain unchanged and in effect.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Alic Bent, c/o OAQ, 100 North Senate Avenue, Indianapolis, Indiana, 46204-2251, or at 973-575-2555, extension 3206, or dial 1-800-451-6027, and ask for extension 3-6878.

Sincerely,

Original Signed By:  
Paul Dubenetzky, Assistant Commissioner  
Office of Air Quality

Attachments  
AB / EVP

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





Mitchell E. Daniels, Jr.  
Governor

Thomas W. Easterly  
Commissioner

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

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

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

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7797-00227	
Issued by: Original signed by Janet G. McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 19, 2004 Expiration Date: March 19, 2009
First Significant Source Modification No.: 089-18109-00227	Issuance Date: June 21, 2004
First Significant Permit Modification No.: 089-18855-00227	Issuance Date: August 6, 2004
First Administrative Amendment No.: 089-21756-00227	Issuance Date: November 16, 2005
Second Significant Permit Modification No.: 089-21470-00227	Pages Affected: Entire Permit
Issued by: Original Signed By: Paul Dubenetzky, Assistant Commissioner Office of Air Quality	Issuance Date: March 17, 2006 Expiration Date: March 19, 2009

## TABLE OF CONTENTS

### A SOURCE SUMMARY

- 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)]
- A.3 Specifically Regulated 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]

### B GENERAL CONDITIONS

- 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]
- B.3 Enforceability [326 IAC 2-7-7]
- B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- 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 Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]
- B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.11 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.12 Emergency Provisions [326 IAC 2-7-16]
- B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]
- B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]
- 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 2-7-4]
- B.18 Permit Amendment or Modification [326 IAC 2-7-11][326 IAC 2-7-12]
- 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]
- 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.25 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

### C SOURCE OPERATION CONDITIONS

#### 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 Stack Height [326 IAC 1-7]
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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

- C.8 Performance Testing [326 IAC 3-6]

#### Compliance Requirements [326 IAC 2-1.1-11]

- C.9 Compliance Requirements [326 IAC 2-1.1-11]

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

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Monitoring Methods [326 IAC 3] [40 CFR 60][40 CFR 63]
- C.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 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.17 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]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

**Stratospheric Ozone Protection**

- C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

**D.1 FACILITY OPERATION CONDITIONS - 12.55, 20.92 and 20 MMBtu Natural Gas Fired Boilers**

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

- D.1.1 Particulate Matter Limitation (PM) [326 IAC 6.8-2] [326 IAC 6-2-4]

**D.2 FACILITY OPERATION CONDITIONS - Chlorination Process**

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

- D.2.1 Lake County PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2] [326 IAC 6.5-1-5]
- D.2.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]
- D.2.3 NESHAP Minor Limit [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart NNNNN] [326 IAC 20-1]

**Compliance Determination Requirements**

- D.2.4 Scrubber Operation Requirement
- D.2.5 Hydrochloric Acid (HCl) and Chlorine (Cl<sub>2</sub>)
- D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

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

- D.2.7 Parametric Monitoring

**Record Keeping and Reporting Section:**

- D.2.8 Record Keeping Requirements
- D.2.9 Reporting Requirements

**D.3 FACILITY OPERATION CONDITIONS - Sulfurization Process**

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

- D.3.1 Lake County PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2] [326 IAC 6.5-1-5]
- D.3.2 Emission PSD Minor Limit and Offset Minor Limit [326 IAC 2-2] [326 IAC 2-3]

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

**Requirements**

- D.3.3 Scrubber Operation Requirements [326 IAC 2-7-10.5]
- D.3.4 Hydrogen Sulfide (H<sub>2</sub>S) [326 IAC 2-7-10.5]

D.3.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

**Monitoring Requirements**

D.3.6 Parametric Monitoring

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

D.3.7 Record Keeping Requirements

D.3.8 Reporting Requirements

**D.4 FACILITY OPERATION CONDITIONS - Hi-Temp Process**

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

D.4.1 Particulate Emissions Limitations, Work Practices and Control Technologies-  
Manufacturing Processes [326 IAC 6-3-2]

**D.5 FACILITY OPERATION CONDITIONS - Fuel Additive Process**

**D.6 FACILITY OPERATION CONDITIONS - Miscellaneous Process**

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

D.6.1 Particulate Emissions Limitations, Work Practices and Control Technologies-  
Manufacturing Processes [326 IAC 6-3-2]

**D.7 FACILITY OPERATION CONDITIONS - Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] VOC Storage Tanks**

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

D.7.1 Volatile Organic Liquid Storage Vessels [326 IAC 12] [40 CFR 60, Part Kb]

D.7.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

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

D.7.3 Record Keeping Requirements

**D.8 FACILITY OPERATION CONDITIONS - Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] 10 MMBtu/hr Boiler**

D.8.1 Particulate Matter Limitation (PM<sub>10</sub>) [326 IAC 6.8-2] [326 IAC 6-2-4]

**Certification**

**Emergency Occurrence Report**

**Monthly Record**

**Part 70 Quarterly Sulfur Usage Report**

**Part 70 Quarterly Sulfurization Products Report**

**Part 70 Quarterly Chlorination Products Report**

**Quarterly Deviation and Compliance Monitoring Report**

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Hammond Department of Environmental Management (HDEM). 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 a stationary chlorinated Paraffin manufacturing plant.

Responsible Official:	Jim MacNeil, General Manager
Source Address:	3000 Sheffield Avenue, Hammond, IN 46327
Mailing Address:	3000 Sheffield Avenue, Hammond, IN 46327
SIC Code:	2899
County Location:	Lake
Source Location Status:	Severe Nonattainment for 1-hour ozone Moderate Nonattainment for 8-hour ozone Nonattainment for PM <sub>2.5</sub> and SO <sub>2</sub> Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules Major Source, under Emission Offset Rules 1 of 28 Source Categories Major Source, Section 112 of the Clean Air Act

### 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:

#### SECTION D.1

##### (a) Group of Boilers

- (1) One (1) Cleaver brooks natural gas fired boiler, Model CB-300HP, identified as B-4, constructed in 1974, rated at 12.55 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3401.
- (2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at 20.92 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.
- (3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403.

SECTION D.2                      Chlorination system

with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 12,000 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
- (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
- (3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;
- (4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;
- (5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;
- (6) One (1) acid tower, identified as CB-2060, constructed in 2005, and with a maximum capacity of 12,000 lb/hr muriatic acid;
- (7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;
- (8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and
- (9) One (1) chlorine vaporizer, identified as XV-2050, constructed in 2005, and with a maximum capacity of 8,000 lb/hr chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

- (1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091 (constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;
- (2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;
- (3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 27,950 gallons each; and

- (4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

- (d) The system consisting of

- (1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;
- (2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and
- (3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

#### SECTION D.3                      Sulfurization system

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

- (e) The system consisting of

- (1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.
- (2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); and 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.
- (3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.
- (4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 15,880 gallons.
- (5) One (1) reflux condenser associated with sulfurization reactor TR-2120.

#### SECTION D.4                      Hi-Temp System

with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

- (f) The system consisting of

- (1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;
- (2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603,

constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;

- (3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;
- (4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and
- (5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

- (g) One (1) Scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.

- (h) A filtration system consisting of

- (1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;
- (2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;
- (3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and
- (4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;

controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

#### SECTION D.5                      Fuel Additive system

with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

- (i) The system consisting of
  - (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
  - (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
  - (3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;

controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.

- (j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 14,930 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.
- (k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.
- (l) Two (2) solvent storage tanks, identified as TS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,760, and 10,570 gallons, respectively.
- (m) Four- (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.
- (n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 11,240, 15,220, and 11,740 gallons, respectively.

#### SECTION D.6                      Miscellaneous system

With a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

- (o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.
- (p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

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

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

#### SECTION D.7                      VOC STORAGE TANKS

- (q) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC. [326 IAC 12, and 40 CFR 60.112b(a)]
  - (1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997.
  - (2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997.
  - (3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993.
  - (4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978.

- (5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978.
- (6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978.
- (7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978.
- (8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978.
- (9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978.
- (10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978.
- (11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978.
- (12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978.
- (13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978.
- (14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978.
- (15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015, constructed in 1987.
- (16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978.
- (17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978.
- (18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978.
- (19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996.
- (20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997.
- (21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997.
- (22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996.
- (23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996.
- (24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997.

- (25) One (1) storage tank, maximum capacity of 28,760 gallons, identified as TS-1026, constructed in 1980.
- (26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027, constructed in 1989.
- (27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980.
- (28) One (1) storage tank, maximum capacity of 15,880 gallons, identified as TS-1029, constructed in 1980.
- (29) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1030, constructed in 1986.
- (30) One (1) blend tank, maximum capacity of 15,220 gallons, identified as TS-1031, constructed in 1986.
- (31) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1032, constructed in 1986.
- (32) One (1) POBA storage tank, maximum capacity of 15,220 gallons, identified as TS-1033, constructed in 1986.
- (33) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1039, constructed in 1987.
- (34) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1040, constructed in 1987.
- (35) One (1) blend tank, maximum capacity of 15,540 gallons, identified as TS-1042, constructed in 1989.
- (36) One (1) storage or blend tank, maximum capacity of 14,900 gallons, identified as TS-1043, constructed in 1990.
- (37) One (1) wax storage tank, maximum capacity of 20,390 gallons, identified as TS-1056, constructed in 1978.
- (38) One (1) storage tank, maximum capacity of 20,390 gallons, identified as TS-1057, constructed in 1978.
- (39) One (1) storage tank, maximum capacity of 4,010 gallons, identified as TS-1081, constructed in 1989.
- (40) One (1) storage tank, maximum capacity of 15,220 gallons, identified as TS-1082, constructed in 1989.
- (41) One (1) storage tank, maximum capacity of 1,320 gallons, identified as TS-1083, constructed in 1976.
- (42) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2160, constructed before 1976.
- (43) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2163, constructed before 1976.
- (44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976.

- (45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976.
- (46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976.
- (47) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2178, constructed in 1998.
- (48) One (1) storage tank, maximum capacity of 2,600 gallons, identified as TS-2209, constructed before 1979.
- (49) One (1) storage tank, maximum capacity of 10,800 gallons, identified as TS-2218, constructed before 1979.
- (50) One (1) storage tank, maximum capacity of 10,690 gallons, identified as TS-2251, constructed before 1976.
- (51) One (1) storage tank, maximum capacity of 6,760 gallons, identified as TS-2253, constructed before 1976.
- (52) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2255, constructed before 1976.
- (53) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2264, constructed before 1979.
- (54) One (1) storage tank, maximum capacity of 31,070 gallons, identified as TS-2265, constructed before 1979.
- (55) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2275, constructed before 1979.
- (56) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2276, constructed before 1979.
- (57) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2277, constructed before 1976.
- (58) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2279, constructed before 1976.
- (59) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2280, constructed before 1976.
- (60) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2305, constructed in 1990.
- (61) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2315, constructed in 1990.
- (62) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2318, constructed in 1990.
- (63) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2362, constructed in 1990.
- (64) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2364, constructed in 1990.

- (65) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2365, constructed in 1990.
- (66) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2367, constructed in 1990.
- (67) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2606, constructed in 1989.
- (68) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2610, constructed in 1990.
- (69) One (1) storage tank, maximum capacity of 4,760 gallons, identified as TS-2612, constructed in 1990.
- (70) One (1) storage tank, maximum capacity of 30,080 gallons, identified as TS-2613, constructed in 1990.
- (71) One (1) storage tank, maximum capacity of 16,920 gallons, identified as TS-2619, constructed in 1990.

SECTION D.8

5.7 MMBtu/hr Boiler

- (r) One (1) natural gas fired boiler, Model, identified as boiler no. B-3, constructed in 1974, rated at 5.7 MMBtu per hour, exhausting at one (1) stack, identified as GB-3403.

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]**

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.3 Enforceability [326 IAC 2-7-7]**

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

### **B.4 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.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, and HDEM within a reasonable time, any information that IDEM, OAQ, HDEM 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, and HDEM, 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 a 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.

- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 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. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, and HDEM 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;
  - (1) 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, and HDEM 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.11 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) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-

3. At a minimum, the PMPs shall include:

- (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and HDEM. IDEM, OAQ, and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "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.12 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 HDEM 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: 317-233-5674 (asks for Compliance Section)  
Facsimile Number: 317-233-5967  
Telephone Number: (219) 853-6306  
Facsimile Number: (219) 853-6343 (FAX)

- (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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, and HDEM 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, and HDEM 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.13 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 in 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, or HDEM 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, or HDEM 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, or HDEM has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

---

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) This permit supersedes all previous registrations and permits.

**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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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 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, or HDEM 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, or HDEM 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, or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal [326 IAC 2-7-4]**

---

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and HDEM 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM on or before the date it is due.
  - (2) If IDEM, OAQ, and HDEM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the

renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
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, and HDEM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, and HDEM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, and HDEM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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

- (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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, and HDEM 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.

**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]**

---

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, and HDEM, 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

Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, and HDEM 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, and HDEM 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 (asks for OAQ, Billing, Licensing and Training Section), to determine the appropriate permit fee.

B.25 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 Matter 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 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.

**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. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

**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. 326 IAC 9-1-2 is not federally enforceable.

**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). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 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. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), and 326 IAC 1-7-4(a), (b), and (d) are not federally enforceable.

**C.7 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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). 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 14-10-4, 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.8 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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 and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and HDEM if the source 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.9 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. 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.10 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  
Indianapolis, Indiana 46204-2251

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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.11 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.12 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.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3] Pursuant to 326 IAC 1-5-2**

---

(Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on August 29, 1996.
- (b) If the ERP is disapproved by IDEM, OAQ, and HDEM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAQ, and HDEM, 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.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

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:

- (a) A Risk Management Plan was prepared as required by 40 CFR 68 and submitted to U.S. EPA. U.S. EPA received the RMP on June 21, 1999.

C.15 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;
  - (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.16 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.17 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) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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  
Indianapolis, Indiana 46204-2251  
and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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

- (b) 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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

- (c) The annual 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, and HDEM on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]

- (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 or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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 reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:
  - (1) Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1 (II)) 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 2-3-1(mm)(2)(A)(3); 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.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]

- (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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and HDEM:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and
  - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
  - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
  - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).

(4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

- (h) 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 and HDEM. The general public may request this information from the IDEM, OAQ and HDEM under 326 IAC 17.1.

### **Stratospheric Ozone Protection**

#### **C.20 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)]:**

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

(a) Group of Boilers

- (1) One (1) Cleaver brooks natural gas fired boiler, Model CB-300HP, identified as B-4, constructed in 1974, rated at 12.55 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3401.
- (2) One (1) Cleaver brooks natural gas fired boiler, Model CB-200-500, identified as B-5, constructed in 1980, rated at 20.92 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3402.
- (3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403.

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

**D.1.1 Particulate Matter Limitation (PM<sub>10</sub>) [326 IAC 6.8-2] [326 IAC 6-2-4]**

- (a) Pursuant to 326 IAC 6.8-2-19 (Lake County PM<sub>10</sub> emission requirements) PM<sub>10</sub> emissions from the Cleaver Brooks boiler B-4 (Stack GB-3401) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.09 pounds per hour.
- (b) Pursuant to 326 IAC 6.8-2-19 (Lake County PM<sub>10</sub> emission requirements) PM<sub>10</sub> emissions from the Cleaver Brooks boiler B-5 (Stack GB-3402) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.14 pounds per hour.
- (c) Pursuant to 326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d)) the particulate emissions from the combustion of natural gas from boiler B-6 (Stack GB-3403) shall be limited to 0.387 pounds per million Btu, and 7.44 pounds per hour.

The above limit is established by the following equation:

$$Pt = (1.09)/(Q^{0.26})$$

Where:

Pt	=	Pounds of particulate matter emitted per million Btu (lb/MMBtu) heat input.
Q	=	Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

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

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

Chlorination process with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
- (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
- (3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;
- (4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;
- (5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;
- (6) One (1) acid tower, identified as CB-2060, constructed in 2005, and with a maximum capacity of 12,000 lb/hr muriatic acid;
- (7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;
- (8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and
- (9) One (1) chlorine vaporizer, identified as XV-2050, constructed in 2005, and with a maximum capacity of 8,000 lb/hr chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

- (1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091 (constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;
- (2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;

- (3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 28,000 gallons each; and
  - (4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;
- controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

- (1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;
- (2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and
- (3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

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

#### **D.2.1 Lake County PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2] [326 IAC 6.5-1-5]**

Pursuant to 326 IAC 6.8-2-19, the allowable PM<sub>10</sub> emission rate from the Chlorination process shall not exceed 0.001 pounds per ton, and 0.003 pounds per hour. Pursuant to 326 IAC 6.5-1-5(d), the Chlorination process shall comply with both limits.

#### **D.2.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]**

Pursuant to 326 IAC 8-9, the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information:

- (a) The vessel identification number
- (b) The vessels dimension
- (c) The vessel capacity

for each of the following vessels.

- (1) TS-2012
- (2) TS-2041
- (3) TS-2043
- (4) TS-2044

#### **D.2.3 NESHAP Minor Limit [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart NNNNN] [326 IAC 20-1]**

- (a) The chlorinated hydrocarbons production at the chlorination process shall be limited to less than 12,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (b) The HCl and Cl<sub>2</sub> emissions shall be limited to 1.45 and 1.07 pounds per ton of chlorinated hydrocarbon produced, respectively.

Compliance with these limits will limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period,

respectively, and make the requirements of 40 CFR Part 63, Subpart NNNNN and Subpart A not applicable.

## Compliance Determination Requirements

### D.2.4 Scrubber Control

---

The scrubber control system shall be in operation at all times when the chlorination system is in operation.

### D.2.5 Hydrochloric Acid (HCl) and Chlorine (Cl<sub>2</sub>)

---

Caustic Scrubber: The caustic strength operations limit shall be no less than 4%. If a representative sample taken during any 8-hour shift shows a caustic percent reading of 4% or less, then the Permittee shall take one of the following steps:

- (1) Fresh caustic will be added to the scrubber; or
- (2) The caustic solution will be changed within 8 hours of test reading; or
- (3) The process will be vented to the backup scrubbers; or
- (4) The process shall be shutdown and the caustic solution changed before the process is started up.

### D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

---

Within ninety (90) days after issuance of this permit, to demonstrate compliance with Condition D.2.3, the Permittee shall perform testing for the chlorination process utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

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

### D.2.7 Parametric Monitoring

---

The Permittee shall test the concentration (% by weight) of caustic in the chlorination scrubbers once per 8-hour shift.

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

### D.2.8 Record Keeping Requirements

---

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the chlorinated hydrocarbons produced at the chlorinated process.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the caustic concentration in the chlorination scrubbers.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### D.2.9 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## SECTION D.3

## FACILITY OPERATION CONDITIONS

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

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

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

- (e) The system consisting of
- (1) Three (3) Sulfurization reactors, identified as TR-2120, 2121, and 2123, constructed before 1976, with maximum capacity of 3,700, 3,700, and 7,500 gallons, respectively, controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.
  - (2) Five (5) blowing tanks, identified as TP-2150 (constructed in 1977), 2151 (constructed in 1977), 2152 (constructed in 1977), 2153 (constructed in 1977); 2154 (constructed in 1997), with maximum capacity of 11,000, 9,650, 11,500, 4,000, and 7,600 gallons, respectively, venting to a blowing tank knockout tank identified as TP-2159; controlled by two (2) caustic scrubbers, identified as TP-2162 and TP-2163 and exhausting at Stack TP-2163.
  - (3) One (1) knockout storage tank, identified as TP-2164, constructed in 1976, with a maximum capacity of 1,500 gallons, exhausted to a caustic slop tank, identified as TP-2167, constructed in 1995, and exhausting at Stack TP-2167.
  - (4) One (1) scrubber liquor storage tank, identified as TS-1029, constructed in 1979, and with a maximum capacity of 16,000 gallons.
  - (5) One (1) reflux condenser associated with sulfurization reactor TR-2120.

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

#### D.3.1 Lake County PM<sub>10</sub> Emission Requirements [326 IAC 6.8-2] [326 IAC 6.5-1-5]

Pursuant to 326 IAC 6.8-2-19, the allowable PM<sub>10</sub> emission rate from the Sulfurization process shall not exceed 0.157 pounds per ton, and 0.23 pounds per hour. Pursuant to 326 IAC 6.5-1-5(d), the Sulfurization process shall comply with both limits.

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

- (a) The amount of sulfur used by the sulfurization process shall be limited to less than 10,335 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit and the scrubber's H<sub>2</sub>S control efficiency of 99.9 percent is required to limit the hydrogen sulfide (H<sub>2</sub>S) emissions to less than 10 tons per twelve (12) consecutive month period. If the monitoring data is not available or indicates the scrubber is not achieving this control efficiency, the Permittee shall use a control efficiency of zero percent (0%). Compliance with this limit makes the rule 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.
- (b) The amount of sulfurized products produced by the sulfurization process shall be limited to less than 26,500 tons per 12 consecutive month period with compliance determined at the end of each month. This usage limit is required to limit the potential to emit of volatile organic compounds (VOC) emissions to less than 10 tons ( Based on 0.000368 pounds of VOC per pound of finished sulfurization products) per twelve (12) consecutive month period. Compliance with this limit makes the rule 326 IAC 2-3 (Emission Offset) not applicable.

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

### Requirements

#### D.3.3 Scrubber Operation Requirements [326 IAC 2-7-10.5]

---

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

#### D.3.4 Hydrogen Sulfide (H<sub>2</sub>S) [326 IAC 2-7-10.5]

---

- (a) The sulfurization scrubber for H<sub>2</sub>S controls shall be in operation and control H<sub>2</sub>S emissions from the sulfurization process at all times the sulfurization process is in operation.
- (b) Caustic Scrubber - First Stage of Series: The caustic strength operations limit shall be no less than 1%. If a representative sample taken during any 8-hour shift shows a caustic percent reading of 1% or less, then the Permittee shall take one of the following steps:
  - (1) The caustic solution will be changed within 8 hours of test reading; or
  - (2) The process shall be shutdown and the caustic solution changed before the process is started up.
- (c) Caustic Scrubber - Second Stage of Series: The caustic strength at the second stage operations limit shall be no less than 10%.
- (d) The on-site Quality Control laboratory shall randomly test one of the 5-day split samples retained per week, unless the process is down for five consecutive days to verify the accuracy of operations data. Enough sample of the randomly tested sample shall also be retained so that an analysis can be run if so requested by the IDEM, OAQ or HDEM within 5 day holding period. Upon request of IDEM, OAQ or HDEM, a sample of the scrubber caustic solution shall be provided and/or the IDEM, OAQ or HDEM may witness a sample collection and test of the scrubber solution.

#### D.3.5 Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]

---

Within one hundred and eighty (180) days after initial startup, the Permittee shall conduct a performance test to verify H<sub>2</sub>S control efficiency as per condition D.3.2 (a) and establish the caustic concentration (% by weight), hourly average operating temperature and minimum liquid circulation volume in the second stage sulfurization scrubber using methods as approved by the Commissioner. This test shall be repeated at least once every five years from the date of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

### Monitoring Requirements

#### D.3.6 Parametric Monitoring

---

- (a) The Permittee shall calibrate, maintain, and operate a continuous monitoring system on the second stage sulfurization scrubber for measuring hourly average operating temperature. From the date of issuance of this permit until the approved stack test results are available the hourly average temperature of the scrubber shall not exceed 170°F.
- (b) (1) The Permittee shall monitor the concentration (% by weight) of caustic once per shift and the scrubber liquid flow rate in second stage sulfurization scrubber once per hour. From the date of issuance of this permit until the approved stack test results are available the concentration (% by weight) of caustic and the scrubber liquid flow rate of the scrubber shall not be lower than 10% and 80 gallons per minute, respectively.

- (2) The Permittee shall test the concentration (% by weight) of caustic in first stage sulfurization scrubber once per shift.
- (c) The Permittee shall monitor the volume and caustic concentration charged to the scrubbers during the recharge operations once per day.
- (d) Split samples taken from the second stage scrubber shall be maintained at the facility for the most current five day calendar period.

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

**D.3.7 Record Keeping Requirements**

---

- (a) The Permittee shall maintain the following records in accordance with Section C - General Record Keeping Requirements, of this permit:
  - (1) The amount of sulfur used and sulfurization products manufactured for each month.
  - (2) The hourly average operating temperature of the second stage of the scrubber.
  - (3) Records of the per shift caustic concentration and per hour liquid flow rate in second stage of the scrubber.
  - (4) Per shift records of the caustic concentration in the first stage of the scrubber.
  - (5) Daily volume and caustic concentration charged to the scrubbers during recharge.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.3.8 Reporting Requirements**

---

- (a) The Permittee shall submit a quarterly report of data required by condition D.3.2 (a) and (b) within 30 days following the reporting period using the reporting forms located at the end of this permit, or their equivalent;
- (b) The Permittee shall submit periodic reports to the addresses listed in Section C – General Reporting Requirements, of this permit. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

## SECTION D.4

## FACILITY OPERATION CONDITIONS

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

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

Hi-Temp process - with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of

- (1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;
- (2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;
- (3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;
- (4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and
- (5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

(g) One (1) scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.

(h) A filtration system consisting of

- (1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;
- (2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;
- (3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and
- (4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;

controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

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

D.4.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]

---

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Hi-Temp reactors shall be limited as follows:

Process/Facility	Reactors	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Hi-Temp Process	TR-2620	0.187	1.33
	TR-2630	0.187	1.33
	Filtration	0.234	1.55

The pounds per hour limitation was calculated using the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

## SECTION D.5

## FACILITY OPERATION CONDITIONS

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

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

Fuel Additive Process - with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

- (i) The system consisting of
  - (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
  - (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
  - (3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.
- (j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 12,000 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.
- (k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.
- (l) Two (2) solvent storage tanks, identified as TS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,800, and 10,000 gallons, respectively.
- (m) Four (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.
- (n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 10,150, 14,900, and 10,150 gallons, respectively.

There are no applicable requirements for these facilities.

**SECTION D.6 FACILITY OPERATION CONDITIONS**

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

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

Miscellaneous Process - with a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

The system consisting of

- (o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.
- (p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

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

**D.6.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Miscellaneous reactors shall be limited as follows:

Process/Facility	Reactors	Process Weight Rate (tons/hr)	Particulate Emission Limit (lbs/hr)
Miscellaneous Process	TR-2224	8.0	16.5
	TR-2225	2.909	8.38
	TR-2226	10.182	19.4
	TR-2227	0.582	2.85
	TR-2228	10.909	20.3
	TR-2329	2.182	6.92
	TR-2322	2.90	8.38

The pounds per hour limitation was calculated using the following equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
 P = process weight rate in tons per hour

## SECTION D.7

## FACILITY OPERATION CONDITIONS

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

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

Specifically regulated insignificant activities with emissions below significant thresholds:

(q) Storage tanks emitting less than one (1) ton per year of a single HAP and less than fifteen (15) pounds per day of VOC.

- (1) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1001, constructed in 1997.
- (2) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1002, constructed in 1997.
- (3) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1003, constructed in 1993.
- (4) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1004, constructed in 1978.
- (5) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1005, constructed in 1978.
- (6) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1006, constructed in 1978.
- (7) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1007, constructed in 1978.
- (8) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1008, constructed in 1978.
- (9) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1009, constructed in 1978.
- (10) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1010, constructed in 1978.
- (11) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1011, constructed in 1978.
- (12) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1012, constructed in 1978.
- (13) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1013, constructed in 1978.
- (14) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1014, constructed in 1978.
- (15) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1015, constructed in 1987.
- (16) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1016, constructed in 1978.

- (17) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1017, constructed in 1978.
- (18) One (1) storage tank, maximum capacity of 21,050 gallons, identified as TS-1018, constructed in 1978.
- (19) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1019, constructed in 1996.
- (20) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1020, constructed in 1997.
- (21) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1021, constructed in 1997.
- (22) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1022, constructed in 1996.
- (23) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1023, constructed in 1996.
- (24) One (1) storage tank, maximum capacity of 27,950 gallons, identified as TS-1024, constructed in 1997.
- (25) One (1) storage tank, maximum capacity of 28,760 gallons, identified as TS-1026, constructed in 1980.
- (26) One (1) storage tank, maximum capacity of 14,930 gallons, identified as TS-1027, constructed in 1989.
- (27) One (1) storage tank, maximum capacity of 11,075 gallons, identified as TS-1028, constructed in 1980.
- (28) One (1) storage tank, maximum capacity of 15,880 gallons, identified as TS-1029, constructed in 1980.
- (29) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1030, constructed in 1986.
- (30) One (1) blend tank, maximum capacity of 15,220 gallons, identified as TS-1031, constructed in 1986.
- (31) One (1) blend tank, maximum capacity of 11,740 gallons, identified as TS-1032, constructed in 1986.
- (32) One (1) POBA storage tank, maximum capacity of 15,220 gallons, identified as TS-1033, constructed in 1986.
- (33) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1039, constructed in 1987.
- (34) One (1) storage tank, maximum capacity of 15,380 gallons, identified as TS-1040, constructed in 1987.
- (35) One (1) blend tank, maximum capacity of 15,540 gallons, identified as TS-1042, constructed in 1989.
- (36) One (1) storage or blend tank, maximum capacity of 14,900 gallons, identified as TS-1043, constructed in 1990.
- (37) One (1) wax storage tank, maximum capacity of 20,390 gallons, identified as TS-1056, constructed in 1978.
- (38) One (1) storage tank, maximum capacity of 20,390 gallons, identified as TS-1057, constructed in 1978.
- (39) One (1) storage tank, maximum capacity of 4,010 gallons, identified as TS-1081, constructed in 1989.

- (40) One (1) storage tank, maximum capacity of 15,220 gallons, identified as TS-1082, constructed in 1989.
- (41) One (1) storage tank, maximum capacity of 1,320 gallons, identified as TS-1083, constructed in 1976.
- (42) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2160, constructed before 1976.
- (43) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2163, constructed before 1976.
- (44) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2168, constructed before 1976, and vented to a scrubber.
- (45) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2169, constructed before 1976 and vented to a scrubber.
- (46) One (1) storage tank, maximum capacity of 15,270 gallons, identified as TS-2170, constructed before 1976 and vented to a scrubber.
- (47) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2178, constructed in 1998.
- (48) One (1) storage tank, maximum capacity of 2,600 gallons, identified as TS-2209, constructed before 1979.
- (49) One (1) storage tank, maximum capacity of 10,800 gallons, identified as TS-2218, constructed before 1979.
- (50) One (1) storage tank, maximum capacity of 10,690 gallons, identified as TS-2251, constructed before 1976.
- (51) One (1) storage tank, maximum capacity of 6,760 gallons, identified as TS-2253, constructed before 1976.
- (52) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2255, constructed before 1976.
- (53) One (1) storage tank, maximum capacity of 10,360 gallons, identified as TS-2264, constructed before 1979.
- (54) One (1) storage tank, maximum capacity of 31,070 gallons, identified as TS-2265, constructed before 1979.
- (55) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2275, constructed before 1979.
- (56) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2276, constructed before 1979.
- (57) One (1) storage tank, maximum capacity of 23,310 gallons, identified as TS-2277, constructed before 1976.
- (58) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2279, constructed before 1976.
- (59) One (1) storage tank, maximum capacity of 3,450 gallons, identified as TS-2280, constructed before 1976.
- (60) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2305, constructed in 1990.
- (61) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2315, constructed in 1990.
- (62) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2318, constructed in 1990.
- (63) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2362, constructed in 1990.

- (64) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2364, constructed in 1990.
- (65) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2365, constructed in 1990.
- (66) One (1) storage tank, maximum capacity of 30,400 gallons, identified as TS-2367, constructed in 1990.
- (67) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2606, constructed in 1989.
- (68) One (1) storage tank, maximum capacity of 10,570 gallons, identified as TS-2610, constructed in 1990.
- (69) One (1) storage tank, maximum capacity of 4,760 gallons, identified as TS-2612, constructed in 1990.
- (70) One (1) storage tank, maximum capacity of 30,080 gallons, identified as TS-2613, constructed in 1990.
- (71) One (1) storage tank, maximum capacity of 16,920 gallons, identified as TS-2619, constructed in 1990.

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

##### **D.7.1 Volatile Organic Liquid Storage Vessels [326 IAC 12] [40 CFR 60, Part Kb]**

Pursuant to 40 CFR 60.116b, the Permittee shall keep readily accessible records showing the dimensions of the storage tanks and an analysis showing the capacities of the following storage tanks.

- (1) TS-1001
- (2) TS-1002
- (3) TS-1003
- (4) TS-1019
- (5) TS-1020
- (6) TS-1021
- (7) TS-1022
- (8) TS-1023
- (9) TS-1024
- (10) TS-1027
- (11) TS-1030
- (12) TS-1031
- (13) TS-1033
- (14) TS-1039
- (15) TS-1040
- (16) TS-1042
- (17) TS-1043
- (18) TS-1082
- (19) TS-2178
- (20) TS-2305
- (21) TS-2315
- (22) TS-2318
- (23) TS-2362
- (24) TS-2364
- (25) TS-2365
- (26) TS-2367
- (27) TS-2606
- (28) TS-2610
- (29) TS-2613
- (30) TS-2619

D.7.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9, the Permittee shall maintain a record and submit to Compliance Branch, OAQ, IDEM a report containing the following information:

- (a) The vessel identification number
- (b) The vessels dimension
- (c) The vessel capacity

for each of the following vessels.

- (1) TS-1004
- (2) TS-1005
- (3) TS-1006
- (4) TS-1007
- (5) TS-1008
- (6) TS-1009
- (7) TS-1010
- (8) TS-1011
- (9) TS-1012
- (10) TS-1013
- (11) TS-1014
- (12) TS-1015
- (13) TS-1016
- (14) TS-1017
- (15) TS-1018
- (16) TS-1026
- (17) TS-1028
- (18) TS-1029
- (19) TS-1032
- (20) TS-1039
- (21) TS-1056
- (22) TS-1057
- (23) TS-1083
- (24) TS-2042
- (25) TS-2160
- (26) TS-2163
- (27) TS-2168
- (28) TS-2169
- (29) TS-2170
- (30) TS-2209
- (31) TS-2218
- (32) TS-2251
- (33) TS-2253
- (34) TS-2255
- (35) TS-2264
- (36) TS-2265
- (37) TS-2275
- (38) TS-2276
- (39) TS-2277
- (40) TS-2279
- (41) TS-2280
- (42) TS-2612

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

### **D.7.3 Record Keeping Requirements**

---

Pursuant to 40 CFR 60.116b and 326 IAC 8-9-6, the Permittee shall keep readily accessible records of each storage tank required by D.7.1 and D.7.2 for the life of the storage tanks.

## SECTION D.8

## FACILITY OPERATION CONDITIONS

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

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

Specifically regulated insignificant activities with emissions below significant thresholds:

- (r) One (1) natural gas fired boiler, Model, identified as boiler no. B-3, constructed in 1974, rated at 5.7 MMBtu per hour, exhausting at one (1) stack, identified as GB-3403.

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

#### D.8.1 Particulate Matter Limitation (PM<sub>10</sub>) [326 IAC 6.8-2] [326 IAC 6-2-4]

- (a) Pursuant to 326 IAC 6.8-2-19 (Lake County PM<sub>10</sub> emission requirements) PM<sub>10</sub> emissions from the Cleaver Brooks boiler B-3 (Stack GB-3403) shall be limited to seven-thousandths (0.007) pounds per million Btu, and 0.07 pounds per hour.

## SECTION E.1

## FACILITY OPERATION CONDITIONS

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

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

Chlorination process with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

(b) The system consisting of

- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
- (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
- (3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;
- (4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;
- (5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;
- (6) One (1) acid tower, identified as CB-2060, constructed in 2005, and with a maximum capacity of 12,000 lb/hr muriatic acid;
- (7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;
- (8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and
- (9) One (1) chlorine vaporizer, identified as XV-2050, constructed in 2005, and with a maximum capacity of 8,000 lb/hr chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

- (1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091 (constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;
- (2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;
- (3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 28,000 gallons each; and
- (4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

- (1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;
- (2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and
- (3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

Hi-Temp process - with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of:

- (1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;
- (2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;
- (3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;
- (4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and
- (5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

- (g) One (1) scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.
- (h) A filtration system consisting of
- (1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;
  - (2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;
  - (3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and
  - (4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;
- controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

Fuel Additive Process - with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

- (i) The system consisting of:
- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
  - (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
  - (3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;
- controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.
- (j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 12,000 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.
- (k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.
- (l) Two (2) solvent storage tanks, identified as TS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,800, and 10,000 gallons, respectively.
- (m) Four (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.
- (n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 10,150, 14,900, and 10,150 gallons, respectively.

**Miscellaneous Process** - with a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

The system consisting of:

- (o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.
- (p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

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

#### **E.1.1 NESHAP Minor Limit [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart NNNNN] [326 IAC 20-1]**

- (a) The total HAP emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to six (6) tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) Total HCl emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to one (1) ton per twelve consecutive month period, with compliance determined at the end of each month.
- (c) Total Cl<sub>2</sub> emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to three (3) tons per twelve consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, and the HAP limits from D.2.3, will limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart NNNNN and Subpart A not applicable.

### **Compliance Determination Requirements**

#### **E.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee shall perform HAP testing for any temporary operation and experimental trial implemented pursuant to 326 IAC 2-1.1-3(h)(3), during the thirty (30) day trial period, to establish a HAP emission rate for that trial. Tests shall be conducted utilizing methods as approved by the Commissioner, and in accordance with Section C- Performance Testing.

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

#### **E.1.3 Record Keeping Requirements**

- (a) The Permittee shall maintain records sufficient to document compliance with Condition E.1.1. These records shall include the following:
  - (1) Total production during each experimental trial period.
  - (2) Total raw material input during each experimental trial period.
  - (3) Total HAP input during each experimental trial period.

- (4) Test data and results for the testing required pursuant to E.1.2.
  - (5) Total emissions from each experimental trial conducted at the source.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### E.1.4 Reporting Requirements

---

A quarterly summary of the information to document compliance with Condition E.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Dover Chemical –Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Part 70 Permit No.: T089-7797-00227

**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  
Indianapolis, Indiana 46204-2251  
Phone: 317-233-5674  
Fax: 317-233-5967  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: Dover Chemical- Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Part 70 Permit No.: T089-7797-00227

**This form consists of 2 pages**

**Page 1 of 2**

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- C** The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), 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 Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , 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  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
Part 70 Quarterly Sulfur Usage Report**

Source Name: Dover Chemical Corporation - Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Part 70 Permit No.: T089-7797-00227  
Facility: Sulfurization Process  
Limit: 10,335 tons of sulfurs used per year

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

Source Name: Dover Chemical Corporation - Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Part 70 Permit No.: T089-7797-00227  
Facility: Sulfurization process  
Limit: 26,500 tons of sulfurization products per year

YEAR:

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

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

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

Attach a signed certification to complete this report.

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

Source Name: Dover Chemical Corporation - Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Part 70 Permit No.: T089-7797-00227  
Facility: Chlorination process  
Limit: 12,000 tons of chlorinated hydrocarbon products per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Chlorinated Hydrocarbon Products	Chlorinated Hydrocarbon Products	Chlorinated Hydrocarbon Products
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Source Name: Dover Chemical Corporation - Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Part 70 Permit No.: T089-7797-00227  
Facility: Temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3) (Facilities Identified in Section E.1)  
Limit: 6 Tons total HAP emissions per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total HAP Emissions	Total HAP emissions	Total HAP Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Source Name: Dover Chemical Corporation - Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
Part 70 Permit No.: T089-7797-00227  
Facility: Temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3) (Facilities Identified in Section E.1)  
Limit: 1 ton HCl and 3 tons Cl<sub>2</sub> per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	This Month		Previous 11 Months		12 Month Total	
	HCl	Cl <sub>2</sub>	HCl	Cl <sub>2</sub>	HCl	Cl <sub>2</sub>
Month 1						
Month 2						
Month 3						

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

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

Attach a signed certification to complete this report.

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

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

Source Name: Dover Chemical – Hammond Works  
Source Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46327  
Part 70 Permit No.: T089-7797-00227  
Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

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:**

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

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 (TSD) for a  
Significant Permit Modification to a Part 70 Operating Permit

**Source Background and Description**

<b>Source Name:</b>	<b>Dover Chemical Corporation – Hammond Works</b>
<b>Source Location:</b>	<b>3000 Sheffield Ave., Hammond, Indiana 46320</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>2899</b>
<b>Operation Permit No.:</b>	<b>T089-7797-00227</b>
<b>Operation Permit Issuance Date:</b>	<b>March 19, 2004</b>
<b>Significant Permit Modification No.:</b>	<b>089-21470-00227</b>
<b>Permit Reviewer:</b>	<b>Alic Bent/EVP</b>

On December 21, 2005, the Office of Air Quality (OAQ) had a notice published in the Post Tribune, Merrillville, Indiana, stating that Dover Chemical Corporation - Hammond Works had applied for a significant permit modification to Part 70 permit T089-7797-00227. This notice was for a modification to their Title V permit to include enforceable permit conditions limiting source-wide HAP emissions below major thresholds, and delete all conditions in Section D.2 related to 40 CFR 63, Subpart NNNNN applicability. 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 January 25, 2006, OAQ received comments from Dover Chemical Corporation - Hammond Works on the proposed permit modification. Upon further consideration, IDEM, OAQ has decided to make changes to the permit as indicated below. The summary of the comments and corresponding responses is shown below. Changes made to the permit as a result of the comments are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

**Comment 1:**

Dover Chemical Corporation is requesting a correction to the Technical Support Document (TSD) for Significant Permit Modification 089-21470-0027. There is one error in the technical support document related to this permit modification. On Page 3, under "Source Status", (c) The table incorrectly lists H<sub>2</sub>S as a HAP. There has been some confusion in the past regarding this compound. The original list of HAPs is located in the USEPA Air Toxics Website. Next to the Hydrogen Sulfide listing there is a modification which states that this material was added to the list through a "clerical error" and that a Joint Resolution to remove H<sub>2</sub>S from the list was passed by the Senate on August 1, 1991 and the House of Representatives on November 25, 1991. The Joint Resolution was approved by the President on December 4, 1991. Therefore, H<sub>2</sub>S should be removed from this table in the TSD. It is critical that this change is made so that there is no confusion about this compound when Dover reports HAPs per the permit modification.

### Response to Comment 1:

The IDEM agrees that H<sub>2</sub>S is not a HAP and should not be listed in the TSD for Significant Permit Modification 089-21470-00227. 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 as part of the record regarding this permit decision.

<b>Source Status</b>
----------------------

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAP's	Potential To Emit (tons/year)
Cl <sub>2</sub>	Greater than 10
H <sub>2</sub> S	<del>Less than 10</del>
HCl	Greater than 10
TOTAL	Greater than 25

Upon further review, IDEM, OAQ has decided to make changes to the permit as indicated below. The summary of the comments and corresponding responses is shown below. Changes made to the permit as a result of the comments are shown in bold and deleted permit language is shown with a line through it. Any permit changes affecting the permit's Table of Contents are also revised without replication herein.

#### Change 1

Section A.2 (a)(3) and Section D.1 (a)(3) descriptive information have been revised to remove "identified as B-4" after GB-3403 as follows:

- (a) Group of Boilers
  - (3) One (1) Superior–Mohawk natural gas fired boiler, identified as B-6, constructed in 1988, rated at 20 MMBtu per hour, and exhausting at one (1) stack, identified as GB-3403.  
~~identified as B-4.~~

#### Change 2

The formatting in Section D.3 description box has been corrected.

In addition, IDEM, OAQ has determined that additional limitations on HAP emissions need to be included to account for temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3). Therefore, IDEM, OAQ has added Section E to the permit as follows:

**SECTION E.1****FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-7-5(15)]:**

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

Chlorination process with a maximum rated capacity of 5,000 pounds per hour of chlorinated metal working products, 10,000 pounds per hour of chlorinated polybutene intermediate products, and 8,300 pounds per hour of muriatic acid consisting of the following equipment:

- (b) The system consisting of
- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
  - (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
  - (3) One (1) sulfur monochloride tank, identified as TS-1058, constructed in 1981, and with a maximum capacity of 5,470 gallons;
  - (4) One (1) acid tower condensate neutralization tank, identified as TP-2030, constructed before 1976, and with a maximum capacity of 500 gallons;
  - (5) Two (2) chlorine railcar track spots, identified as RC-0101 and RC-0201, constructed before 1976, and with a maximum capacity of 1 railcar (containing at most 180,600 pounds) each;
  - (6) One (1) acid tower, identified as CB-2060, constructed in 2005, and with a maximum capacity of 12,000 lb/hr muriatic acid;
  - (7) One (1) tower product acid tank, identified as TP-2033, constructed before 1976, and with a maximum capacity of 560-gallons;
  - (8) One (1) tower water feed tank, identified as TP-2060 (constructed in 1996), and with a maximum capacity of 560-gallons; and
  - (9) One (1) chlorine vaporizer, identified as XV-2050, constructed in 2005, and with a maximum capacity of 8,000 lb/hr chlorine;

all controlled by seven (7) scrubbers identified as TP-2061 (constructed before 1976), TP-2062 (constructed before 1976), TP-2063 (constructed before 1976), TP-2064 (constructed before 1976), TP-2065 (constructed in 1977), TP-2066 (constructed in 1977), and TP-2067 (constructed in 1995), and exhausting at seven (7) stacks, identified as Stacks TP-2061 to 2067.

(c) The system consisting of

- (1) Three (3) muriatic acid tanks, identified as TS-1090 (constructed in 1979), TS-1091 (constructed in 1980), and TS-1093 (constructed in 2000), and with a maximum capacity of 14,900, 16,000, and 16,000 gallons, respectively;
- (2) Two (2) hypochlorite reduction tanks, identified as TP-3494, and TP-3495 (constructed in 1993), and with a maximum capacity of 6,250 gallons each;
- (3) Two (2) chlorinated polybutene storage tanks, identified as TS-1019, and TS-1023 (constructed in 1997), and with a maximum capacity of 28,000 gallons each; and
- (4) One (1) muriatic acid tank truck loading station, constructed in 1979, and with a maximum capacity of 1 truck;

controlled by one (1) caustic scrubber identified as TP-1030 constructed in 1980 exhausting at one (1) stack, identified as Stack TP-1030.

(d) The system consisting of

- (1) One (1) chlorinated product tank, identified as TS-2041, constructed before 1976, with a maximum capacity of 4,000 gallons;
- (2) Two (2) chlorinated product tanks, identified as TS-2043, and TS-2044, constructed before 1976, and with a maximum capacity of 4,100 gallons each; and
- (3) One (1) chlorinated product-drumming tank, identified as TS-2012, constructed in 1978, and with a maximum capacity of 1,500 gallons.

Hi-Temp process - with a maximum rated capacity of 4,200 pounds per hour of hi-temp products consisting of the following equipment:

(f) The system consisting of:

- (1) Two (2) reactors, identified as TR-2320 and TR-2630, constructed in 1989, and 1990, respectively, and with a maximum capacity of 4,000 gallons each;
- (2) Two (2) recovered methanol tanks, identified as TS-2602 and TS-2603, constructed in 1989, and with maximum capacity of 2,500, and 4,000 gallons, respectively;
- (3) One (1) sludge tank, identified as TP-2604, constructed in 1989, and with a maximum capacity of 750 gallons;
- (4) One (1) scrubber liquor tank, identified as TS-2610, constructed in 2001, and with a maximum capacity of 10,000 gallons; and
- (5) One (1) intermediate holding tank, identified as TP-2601, constructed in 1989, and with a maximum capacity of 4,550 gallons;

controlled by two (2) caustic scrubbers identified as TP-2624 and TP-2626, constructed in 1989; and one flare, identified as GG-2627, constructed in 1990, in series, and exhausting at one (1) stack, identified as Stack GG-2627. Alternately, the reactors identified in item (f.1) can be controlled by one (1) scrubber identified as TP-2636, constructed in 1990; and exhausting at one (1) stack identified as Stack TP-2636.

- (g) One (1) scrubber liquor truck loading station, constructed in 1989 controlled by a carbon drum, identified as TF-2610 constructed in 2001.
- (h) A filtration system consisting of
- (1) One (1) pre-coat tank, identified as TP-2722, constructed in 1995, and with a maximum capacity of 1,300 gallons;
  - (2) One (1) filter feed tank, identified as TP-2720, constructed in 1995, and with a maximum capacity of 5,000 gallons;
  - (3) One (1) filtrate tank, identified as TP-2730, constructed in 1995, and with a maximum capacity of 5,000 gallons; and
  - (4) One (1) filter, identified as GF-2741, constructed in 1995, and with a maximum capacity of 69 cubic feet of filter cake;
- controlled by a carbon drum, identified as GF-2728, and exhausting at a stack, identified as Stack GF-2728.

Fuel Additive Process - with a maximum rated capacity of 12,000 pounds per hour of fuel additives (prior to blending) consisting of the following equipment:

- (i) The system consisting of:
- (1) Nine (9) reactors, identified as TR-2001 (constructed before 1976), 2003 (constructed before 1976), 2004 (constructed before 1976), 2005 (constructed before 1976), 2006 (constructed before 1976), 2007 (constructed in 1977), 2008 (constructed in 1977) 2010 (constructed in 1983), and 2014 (constructed in 1990), and with a maximum capacity of 2,000 gallons each;
  - (2) Five (5) reactors, identified as TR-2002 (constructed in 1988), 2009 (constructed in 1982), 2015 (constructed in 1990), 2016 (constructed in 1990), and 2017 (constructed in 1993), and with a maximum capacity of 4,000 gallons each;
  - (3) One (1) EDA recycle tank, identified as TS-2052 (constructed in 1985), and with a maximum capacity of 1,700 gallons;
- controlled by a scrubber identified as TP-2072 (constructed in 1985), and exhausting at a stack identified as Stack TP-2072.
- (j) One (1) virgin EDA tank, identified as TS-1027, (constructed in 1985), maximum capacity of 12,000 gallons, controlled by a carbon adsorption drum identified as GF-1029, and exhausting at stack identified as Stack GF-1029.
- (k) Two (2) continuous wash systems and two (2) stripping columns identified as CD-2319 (constructed in 1985) and CD-2350 (constructed in 1990), controlled by two (2) vent condensers identified as XT-2313, and XT-2350, and exhausting at stacks identified as Stack XT-2313, and Stack XT-2350.
- (l) Two (2) solvent storage tanks, identified as TS-1026 (constructed in 1985), and TS-2318 (constructed in 1990), and maximum capacity of 28,800, and 10,000 gallons, respectively.
- (m) Four (4) product rundown tanks, and identified as TS-1035, TS-1036 (both constructed in 1985), TP-2360, and TP-2361 (both constructed in 1990), and maximum capacity of 6,800 gallons each.
- (n) Three (3) fuel additive blending tanks, identified as TS-1030, TS-1031, and TS-1032 (all constructed in 1985), and maximum capacity of 10,150, 14,900, and 10,150 gallons, respectively.

Miscellaneous Process - with a maximum rated capacity of 3,000 pounds per hour consisting of the following equipment:

The system consisting of:

- (o) Five reactors, identified as TR-2224 (constructed in 1980), 2225 (constructed before 1976), 2226 (constructed before 1976), 2227 (constructed before 1976), and 2228 (constructed before 1976), maximum capacity of 5,500, 2,000, 7,000, 400, and 7,500 gallons, respectively; controlled by two (2) wet scrubbers, identified as PE-2228, and TP-2332, and exhausting at stacks identified as Stack PE-2228, and Stack TP-2332.
- (p) Two (2) reactors, identified as TR-2329 (constructed in 1986), and TR-2322 (constructed in 1984), maximum capacity of 1,500, and 2,000 gallons, respectively, controlled by a demister (constructed in 1989), identified as TP-2322 and exhausting at stack, identified as Stack TP-2322.

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

#### **E.1.1 NESHAP Minor Limit [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart NNNNN] [326 IAC 20-1]**

- (a) The total HAP emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to six (6) tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) Total HCl emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to one (1) ton per twelve consecutive month period, with compliance determined at the end of each month.
- (c) Total Cl<sub>2</sub> emissions from all temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3), shall be limited to three (3) tons per twelve consecutive month period, with compliance determined at the end of each month.

Compliance with these limits, and the HAP limits from D.2.3, will limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart NNNNN and Subpart A not applicable.

### **Compliance Determination Requirements**

#### **E.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee shall perform HAP testing for any temporary operation and experimental trial implemented pursuant to 326 IAC 2-1.1-3(h)(3), during the thirty (30) day trial period, to establish a HAP emission rate for that trial. Tests shall be conducted utilizing methods as approved by the Commissioner, and in accordance with Section C- Performance Testing.

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

#### **E.1.3 Record Keeping Requirements**

- (a) The Permittee shall maintain records sufficient to document compliance with Condition E.1.1. These records shall include the following:
  - (1) Total production during each experimental trial period.
  - (2) Total raw material input during each experimental trial period.
  - (3) Total HAP input during each experimental trial period.

- (4) Test data and results for the testing required pursuant to E.1.2.
  - (5) Total emissions from each experimental trial conducted at the source.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**E.1.4 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition E.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

IDEM, OAQ has added the following tables to the permit to be used for the reporting requirements specified in E.1.4:

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

Source Name: Dover Chemical Corporation - Hammond Works  
 Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
 Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
 Part 70 Permit No.: T089-7797-00227  
 Facility: Temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3) (Facilities Identified in Section E.1)  
 Limit: 6 Tons total HAP emissions per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	Total HAP Emissions	Total HAP emissions	Total HAP Emissions
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

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

Source Name: Dover Chemical Corporation - Hammond Works  
 Source Address: 3000 Sheffield Avenue, Hammond, IN 46320  
 Mailing Address: 3000 Sheffield Avenue, Hammond, IN 46320  
 Part 70 Permit No.: T089-7797-00227  
 Facility: Temporary operation and experimental trials, implemented pursuant to 326 IAC 2-1.1-3(h)(3) (Facilities Identified in Section E.1)  
 Limit: 1 ton HCl and 3 tons Cl<sub>2</sub> per 12 consecutive month period with compliance determined at the end of each month.

YEAR:

Month	This Month		Previous 11 Months		12 Month Total	
	HCl	Cl <sub>2</sub>	HCl	Cl <sub>2</sub>	HCl	Cl <sub>2</sub>
Month 1						
Month 2						
Month 3						

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

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

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Significant Permit Modification.

#### Source Description and Location

<b>Source Name:</b>	<b>Dover Chemical Corporation – Hammond Works</b>
<b>Source Location:</b>	<b>3000 Sheffield Ave., Hammond, Indiana 46327</b>
<b>County:</b>	<b>Lake</b>
<b>SIC Code:</b>	<b>2899</b>
<b>Operation Permit No.:</b>	<b>T089-7797-00227</b>
<b>Operation Permit Issuance Date:</b>	<b>March 19, 2004</b>
<b>Significant Permit Modification No.:</b>	<b>089-21470-00227</b>
<b>Permit Reviewer:</b>	<b>Alic Bent/EVP</b>

#### Existing Approvals

The source was issued a Part 70 Operating Permit T089-7797-00227 on March 19, 2004. The source has since received the following approvals:

- (a) Significant Source Modification No.: 089-18109-00227, issued on June 21, 2004;
- (b) Significant Permit Modification No.: 089-18855-00227, issued on August 6, 2004;
- (c) Exemption No. 089-21189-00227, issued on June 1, 2005; and
- (d) First Administrative Amendment No. 089-21756-00227, issued on November 16, 2005.

#### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO <sub>2</sub>	Primary Nonattainment
NO <sub>2</sub>	Attainment
1-hour Ozone	Severe Nonattainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and Nitrogen Oxides (NO<sub>x</sub>) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone.

- (1) On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO<sub>x</sub> threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Lake County has been designated as severe nonattainment in Indiana for the 1-hour ozone standard. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
  - (2) VOC and NO<sub>x</sub> 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<sub>x</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM<sub>2.5</sub>. 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 nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM<sub>10</sub> emissions as a surrogate for PM<sub>2.5</sub> emissions pursuant to the requirements of Emission Offset, 326 IAC 2-3.
  - (c) Lake County has been classified as attainment or unclassifiable in Indiana for PM<sub>10</sub>, CO and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
  - (d) Lake County has been classified as primary nonattainment in Indiana for SO<sub>2</sub>. Therefore, SO<sub>2</sub> emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
  - (e) Fugitive Emissions  
Since this type of operation is in one of the twenty (28) listed source categories under 326 IAC 2-3 and 326 IAC 2-2, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

<b>Source Status</b>
----------------------

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

Pollutant	Emissions (tons/year)
PM	Less than 100
PM <sub>10</sub>	Less than 100
SO <sub>2</sub>	Less than 100
VOC	Greater than 25
CO	Less than 100
NO <sub>x</sub>	Less than 100

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because

no attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).

- (b) This existing source is a major stationary source, under Emission Offset (326 IAC 2-3), because VOC is emitted at a rate of 25 tons per year or more.
- (c) These emissions are based upon Part 70 Operating Permit 089-7797-00227, issued on March 19, 2004.

The table below summarizes the potential to emit HAPs for the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

HAP's	Potential To Emit (tons/year)
Cl <sub>2</sub>	Greater than 10
H <sub>2</sub> S	Less than 10
HCl	Greater than 10
TOTAL	Greater than 25

This existing source is a major source of HAPs, as defined in 40 CFR 63.41, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

**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)
PM	No data
PM10	0
SO <sub>2</sub>	0
VOC	8
CO	6
NO <sub>x</sub>	7
HAP (specify)	No data

**Background and Description of Proposed Modification**

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Dover Chemical Corporation – Hammond Works on July 15, 2005, relating to a modification to their Title V permit to include enforceable permit conditions limiting source-wide HAP emissions below major thresholds, and the deletion of all conditions in Section D.2 relating to 40 CFR 63, Subpart NNNNN applicability.

The requirements of 40 CFR Part 63 Subpart NNNNN (National Emission Standards for

Hazardous Air Pollutants: Hydrochloric Acid Production) are applicable to all HCl production located at plant sites that are major sources of HAP emissions. This source is a HCl production plant and has the potential to emit HCl and Cl<sub>2</sub> greater than the major thresholds for HAPs. Since this rule has a future compliance date of April 17, 2006, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has opted to limit the source-wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of Subpart NNNNN in Section D.2.3 through Section D.2.6 of the Title V operating permit T089-7797-00227 will be deleted and enforceable permit conditions limiting source-wide HAP emissions below major thresholds will be added.

### **Enforcement Issues**

There are no pending enforcement actions related to this modification.

### **Emission Calculations**

See Appendix A of this document for HCl and Cl<sub>2</sub> usage limit calculations.

### **Permit Level Determination – Part 70**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit 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, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the changes in PTE before controls due to the modification. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.0
PM10	0.0
SO <sub>2</sub>	0.0
VOC	0.0
CO	0.0
NO <sub>x</sub>	0.0
HAPs	0.0

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d)(1) which states “every significant change in existing monitoring Part 70 permit terms or conditions and every relaxation of reporting or record keeping permit terms or conditions shall be considered significant”, because it involves the removing of permit conditions and the addition of enforceable permit conditions limiting source-wide HAP emissions below major thresholds.

### Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (b) The requirements of 40 CFR Part 63 Subpart NNNNN (National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production) are applicable to all HCl production located at plant sites that are major sources of HAP emissions. This source is a HCl production plant and has the potential to emit HCl and Cl<sub>2</sub> greater than the major thresholds for HAPs. Since this rule has a future compliance date of April 17, 2006, the source may opt for emission limits which will limit HAP emissions to less than major thresholds.

The source has chosen to limit the chlorinated hydrocarbons production at the chlorination process to less than 12,000 tons per 12 consecutive month period with compliance determined at the end of each month, which is equivalent to single HAP and combined HAP emissions of less than 10 and 25 tons per 12 consecutive month period, respectively, based on HCl and Cl<sub>2</sub> emission factors of 1.45 and 1.07 pounds per ton of chlorinated hydrocarbon produced, respectively (see Appendix A for calculations). Compliance with these limits shall limit source wide emissions of combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63, Subpart NNNNN (Hydrochloric Acid Production) do not apply to this source.

### State Rule Applicability Determination

There are no new State Rules included in this permit due to this modification.

### Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a 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 Determination Requirements are included in the permit. The Compliance determination requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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.

There are no compliance determination requirements or compliance monitoring requirements applicable to this modification.

### Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T089-7797-00227. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The following conditions in Section D.2 of the Title V operating permit have been removed to reflect the non-applicability of Subpart NNNNN and enforceable permit conditions limiting source-wide HAP emissions below major thresholds have been added:

#### ~~D.2.3 General Provisions Relating to NESHAP [326 IAC 20-1-1][40 CFR Part 63, Subpart A]~~

- ~~(a) The provisions of 40 CFR 63 Subpart A General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the hydrochloric acid production, as an affected source, as designated by 40 CFR 63.8985, except when otherwise specified in 40 CFR 63 Subpart NNNNN. The Permittee must comply with these requirements on and after April 17, 2003.~~
- ~~(b) Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~

#### ~~D.2.4 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]~~

- ~~(a) The affected source, the hydrochloric production facility is the collection of unit operations and equipment associated with production of liquid hydrochloric acid (HCl) product at a concentration of 30 weight percent or greater during its normal operations, is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hydrochloric Acid Manufacturing [40 CFR Part 63, Subpart NNNNN]. Pursuant to this rule, the Permittee must comply with 40 CFR 63, Subpart NNNNN no later than 3 years after April 17, 2003, or accept to and meet an enforceable HAP emissions limit below the major source threshold prior to three years after April 17, 2003. Since the applicable requirements associated with the compliance options are not included and specifically identified in this permit, the permit shield authorized by the B section of this permit in the condition titled Permit Shield, and set out in 326 IAC 2-7-15 does not apply to paragraph (a) of this condition.~~
- ~~(b) The following emissions units comprise the affected source that is subject to 40 CFR 63, Subpart NNNNN:~~
  - ~~(1) CS 2060 Hydrochloric Acid Tower~~
  - ~~(2) TP 2060 Acid Tower Feed Water Tank~~
  - ~~(3) TP 2033 Hydrochloric Acid Tower Product Tank~~
  - ~~(4) TP 2061, 2062, 2065 & 2066 Scrubbers (TP 2065 and TP 2066 are back up scrubbers).~~
  - ~~(5) TP 1030 Tank Farm Acid Loading Scrubber~~
  - ~~(6) TS 1090, 1091, 1093 Muriatic Acid Storage Tanks (three storage tanks)~~
  - ~~(7) The hydrochloric acid vent line going from the tank wagon over to the Tank Farm Scrubber TP 1030~~

#### **Record Keeping and Reporting Section:**

#### ~~D.2.5 National Emissions Standards for Hazardous Air Pollutants for Hydrochloric Acid Manufacturing Notification Requirements [40 CFR 63, Subpart NNNNN]~~

~~Pursuant to 40 CFR 63.9045,~~

- ~~(a) the Permittee shall submit all of the notifications in Sec. Sec. 63.7(b) and (c), 63.8(f)(4)~~

and (6), and 63.9 (b) through (h) that apply to this source by the dates specified;

- ~~(b) As specified in Sec. 63.9(b)(2), the Permittee shall submit an Initial Notification not later than 120 calendar days after April 17, 2003;~~
- ~~(c) the Permittee shall submit a notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin, as required in Sec. 63.7(b)(1);~~
- ~~(d) If a performance test is required as specified in Table 3 to this subpart, the Permittee shall submit a Notification of Compliance Status according to Sec. 63.9(h)(2)(ii);~~
- ~~(e) the Permittee shall submit the Notification of Compliance Status, including the performance test results, before the close of business on the 60th calendar day following the completion of the performance test according to Sec. 63.10(d)(2); and~~
- ~~(f) the Notification of Compliance Status shall also include the information in paragraph (f)(1) through (2) of this section~~
  - ~~(1) each operating parameter value averaged over the full period of the performance test (for example, average pH).~~
  - ~~(2) each operating parameter range within which HAP emissions are reduced to the level corresponding to meeting the applicable emission limits in Table 1 to this subpart.~~
- ~~(g) The notifications required by paragraphs (a) through (b) shall be submitted to:~~

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

~~and~~

~~United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604 3590~~

~~and~~

~~Hammond Department of Environmental Management  
5925 Calumet Avenue, Room 304  
Hammond, Indiana 46327~~

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

5]

---

The Permittee shall submit an application for a significant permit modification to IDEM, OAQ to include information regarding which compliance option or options will be chosen in the Part 70 permit.

- (a) The significant permit modification application shall be consistent with 326 IAC 2-7-12, including information sufficient for IDEM, OAQ to incorporate into the Part 70 permit the applicable requirements of 40 CFR 63, Subpart NNNNN, a description of the affected source and activities subject to the standard, and a description of how the Permittee will meet the applicable requirements of the standard.
- (b) The significant permit modification application shall be submitted no later than twenty seven months after April 17, 2003.
- (c) The significant permit modification application shall be submitted to:

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

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room 304  
Hammond, Indiana 46327

#### D.2.3 NESHAP Minor Limit [40 CFR Part 63, Subpart A] [40 CFR Part 63, Subpart NNNNN] [326 IAC 20-1]

---

- (a) The chlorinated hydrocarbons production at the chlorination process shall be limited to less than 12,000 tons per 12 consecutive month period with compliance determined at the end of each month.
- (b) The HCl and Cl<sub>2</sub> emissions shall be limited to 1.45 and 1.07 pounds per ton of chlorinated hydrocarbon, respectively.

Compliance with these limits will limit the source-wide potential to emit of single HAP and combined HAP emissions to less than 10 and 25 tons per 12 consecutive month period, respectively, and make the requirements of 40 CFR Part 63, Subpart NNNNN and Subpart A not applicable.

#### Compliance Determination Requirements

##### D.2.4 Scrubber Operation Requirements

---

The scrubber control system shall be in operation at all times when the chlorination system is in operation.

##### D.2.5 Hydrochloric Acid (HCl) and Chlorine (Cl<sub>2</sub>)

---

Caustic Scrubber: The caustic strength operations limit shall be no less than 4%. If a representative sample taken during any 8-hour shift shows a caustic percent reading of 4% or less, then the Permittee shall take one of the following steps:

- (1) Fresh caustic will be added to the scrubber; or
- (2) The caustic solution will be changed within 8 hours of test reading; or
- (3) The process will be vented to the backup scrubbers; or

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

**D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

---

Within ninety (90) days after issuance of this permit, to demonstrate compliance with Condition D.2.3, the Permittee shall perform testing for the chlorination process utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C- Performance Testing.

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

**D.2.7 Parametric Monitoring**

---

The Permittee shall test the concentration (% by weight) of caustic in the chlorination scrubbers once per 8-hour shift.

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

**D.2.8 Record Keeping Requirements**

---

- (a) To document compliance with Condition D.2.3, the Permittee shall maintain records of the chlorinated hydrocarbons produced at the chlorinated process.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records once per shift of the caustic concentration in the chlorination scrubbers.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.2.9 Reporting Requirements**

---

A quarterly summary of the information to document compliance with Condition D.2.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

**Source Name:** Dover Chemical Corporation - Hammond Works  
**Source Address:** 3000 Sheffield Avenue, Hammond, IN 46320  
**Mailing Address:** 3000 Sheffield Avenue, Hammond, IN 46320  
**Part 70 Permit No.:** T089-7797-00227  
**Facility:** Chlorination process  
**Limit:** 12,000 tons of chlorinated hydrocarbon products per 12 consecutive month period with compliance determined at the end of each month.

**YEAR:**

Month	Chlorinated Hydrocarbon Products	Chlorinated Hydrocarbon Products	Chlorinated Hydrocarbon Products
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

**Attach a signed certification to complete this report.**

2. Upon further review, IDEM, OAQ has determined that it is not necessary to include a condition requiring a preventive maintenance plan in each individual Section D of the permit. Rather, a

general condition will be placed in Section B of the permit, which will apply to the entire source. Condition D.3.3 has been removed from the permit, and item (a) in Section B has been revised. Additionally, IDEM, OAQ has determined that the Permittee is not required to keep records of all preventive maintenance. However, where the Permittee seeks to demonstrate that an emergency has occurred, the Permittee must provide, upon request, records of preventive maintenance in order to establish that the lack of proper maintenance did not cause or contribute to the deviation. Therefore, IDEM has deleted paragraph (b) of Section B – Preventive Maintenance, and has amended the Section B – Emergency Provisions condition as follows:

B.11 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 prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility: **for the source as described in 326 IAC 1-6-3. At a minimum, the PMPs shall include:**

- (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.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(b)~~ ~~The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.~~

~~(e)~~ **(b)** A copy of the PMPs shall be submitted to IDEM, OAQ, and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and HDEM. IDEM, OAQ, and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(d)~~ **(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.12 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 HDEM 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: 317-233-5674 (asks for Compliance Section)  
Facsimile Number: 317-233-5967  
Telephone Number: (219) 853-6306  
Facsimile Number: (219) 853-6343 (FAX)

- (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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, and HDEM 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, and HDEM 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.**

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

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

3. IDEM, OAQ has clarified the Condition B.20 (Operational Flexibility) as follows:

~~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 ~~emissions allowable under 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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

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, ~~on a rolling five (5) year basis~~, all such changes and emissions trading **trades** that are subject to 326 IAC 2-7-20(b), (c), or (e). ~~and makes~~ **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, and HDEM 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 ~~in emissions in~~ **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.

4. IDEM, OAQ has decided that it is best to have this requirement under compliance determination in the specific D conditions, and remove Condition C.6.

~~G.6 Operation of Equipment [326 IAC 2-7-6(6)]~~

~~Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.~~

5. IDEM, OAQ realizes that the specifications in Condition C.13 (Pressure Gauge and Other Instrument Specifications) can only be practically applied to analog units, and has therefore clarified the condition to state that the condition only applies to analog units. Upon further review, IDEM, OAQ has also determined that the accuracy of the instruments is not nearly as important as whether the instrument has a range that is appropriate for the normal expected reading of the parameter. Therefore, the accuracy requirements have been removed from the condition.

~~C.132 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]~~

- ~~(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed~~ **When required by an 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 normal **maximum** reading **for the normal range** shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- ~~(b) Whenever a condition in this permit requires the measurement of a flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.~~
- ~~(c)~~ **(b)** The Permittee may request **that** the IDEM, OAQ approve the use of a ~~pressure gauge or other~~ **an** instrument that does not meet the above specifications provided the Permittee can demonstrate **that** an alternative ~~pressure gauge or other~~ instrument specification will adequately ensure compliance with permit conditions requiring the measurement of ~~pressure drop or other~~ **the** parameters.

6. IDEM, OAQ has reconsidered the requirement to develop and follow a Compliance Response Plan. The Permittee will still be required to take reasonable response steps when a compliance monitoring parameter is determined to be out of range or abnormal. Replacing the requirement to develop and follow a Compliance Response Plan with a requirement to take reasonable response steps will ensure that the control equipment is returned to proper operation as soon as practicable, while still allowing the Permittee the flexibility to respond to situations that were not anticipated. The Section D conditions that refer to this condition have been revised to reflect the new condition title, and the following changes have been made to the Section C condition:

**C.165 Compliance Response Plan – Preparation, Implementation, Records, and Reports Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]**

---

- (a) ~~The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:~~
- (1) ~~Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.~~
  - (2) ~~If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.~~

~~The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.~~

- (b) ~~For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:~~
- (1) ~~Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or~~
  - (2) ~~If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.~~

- ~~(3) — If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.~~
- ~~(4) — Failure to take reasonable response steps shall be considered a deviation from the permit.~~
- ~~(c) — The Permittee is not required to take any further response steps for any of the following reasons:~~
- ~~(1) — A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.~~
- ~~(2) — The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.~~
- ~~(3) — An automatic measurement was taken when the process was not operating.~~
- ~~(4) — The process has already returned or is returning to operating within “normal” parameters and no response steps are required.~~
- ~~(d) — When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.~~
- ~~(e) — The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(f) — Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.~~
- (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;**
  - (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.**

7. IDEM, OAQ has clarified the Condition C.18 (Emission Statement) as follows:

**C.187** 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] [326 IAC 2-7-19 (e)]

---

- ~~(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
  - ~~(1) Indicate estimated actual emissions of criteria pollutants from the source;~~
  - ~~(2) Indicate estimated actual emissions of other 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 purposes of Part 70 fee assessment.~~~~

**Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year 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  
Indianapolis, Indiana 46204-2251**

**and**

**Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327**

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

- (b) ~~The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:~~

**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  
Indianapolis, Indiana 46204-2251**

**and**

**Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327**

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

- (c) The annual 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, and HDEM on or before the date it is due.

reform provision at the major sources.

**C.198 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-3]**

---

- (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 or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM 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 reasonable possibility that a “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, other than projects at a Clean Unit, which is not part of a “major modification” (as defined in 326 IAC 2-3-1 (z)) may result in significant emissions increase and the Permittee elects to utilize the “projected actual emissions” (as defined in 326 IAC 2-3-1 (mm)), the Permittee shall comply with following:**
  - (1) **Before beginning actual construction of the “project” (as defined in 326 IAC 2-3-1 (II)) 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 2-3-1(mm)(2)(A)(3); 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.2019 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-3]**

---

- (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  
Indianapolis, Indiana 46204-2251

and

Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and HDEM 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) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. 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) **If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any “project” (as defined in 326 IAC 2-3-1 (II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ and HDEM:**
- (1) **The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-3-1 (qq), for that regulated NSR pollutant, and**
  - (2) **The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).**
- (g) **The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:**
- (1) **The name, address, and telephone number of the major stationary source.**
  - (2) **The annual emissions calculated in accordance with (c)(2) and (3) in Section**

**C- General Record Keeping Requirements.**

**(3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-3-2(c)(3).**

**(4) Any other information that the Permittee deems fit to include in this report,**

**Reports required in this part shall be submitted to:**

**Indiana Department of Environmental Management  
Air Compliance Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2251**

**and**

**Hammond Department of Environmental Management  
5925 Calumet Avenue, Room – 304  
Hammond, Indiana 46327**

**(h) 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 and HDEM. The general public may request this information from the IDEM, OAQ and HDEM under 326 IAC 17.1.**

9. It is no longer necessary to have C.22 Application Requirements for Section 112(j) in any new permits; therefore, this condition is being removed from the permit.

~~C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]~~

~~(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).~~

~~(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:~~

~~(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;~~

~~(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or~~

~~(3) The MACT standard or standards for the affected source categories included at the source are promulgated.~~

~~(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided~~

~~in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case by case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 63, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:~~

~~Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue  
Indianapolis, Indiana 46204-2254~~

~~and~~

~~United States Environmental Protection Agency, Region V  
Director, Air and Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

10. Indiana was required to incorporate credible evidence provisions into state rules consistent with the SIP call published by U.S. EPA in 1997 (62 FR 8314). Indiana has incorporated the credible evidence provision in 326 IAC 1-1-6. This rule is effective March 16, 2005; therefore, the condition reflecting this rule is incorporated into the Part 70 permit as follows:

**B.25 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.**

11. Conditions D.4.1 and D.6.1 have been revised to correct the rule cite.

**D.4.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2~~(e)(3)~~ (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Hi-Temp reactors shall be limited as follows:

**D.6.1 Particulate Emissions Limitations, Work Practices and Control Technologies- Manufacturing Processes [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2~~(e)(3)~~ (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the Miscellaneous reactors shall be limited as follows:

12. Table of Contents section of the permit has been revised accordingly.

**Conclusion and Recommendation**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 089-21470-00227. The staff recommend to the Commissioner that this Part 70 Significant Permit Modification be approved.

**Appendix A: Emission Calculations  
HAP Calculations**

**Company Name: Dover Chemical Corporation - Hammond Works  
Address City IN Zip: 3000 Sheffield Ave., Hammond, IN 46327  
SPM#: 089-21470-00227  
Permit Reviewer: Alic Bent/EVP**

**Hydrochloric Acid (HCl) and Chlorine (Cl<sub>2</sub>) Emissions**

Chlorination Process	Chlorinated Hydrocarbon Produced (tons/yr)	Hydrochloric Acid EF (lbs HCl / ton Chlorinated Hydrocarbon)	Chlorine EF (lbs Cl <sub>2</sub> / ton Chlorinated Hydrocarbon)	HCl Emissions (tons/yr)	Cl <sub>2</sub> Emissions (tons/yr)
		12,000.00	1.45	1.07	8.70

Note:  
Emission factors for Cl<sub>2</sub> and HCl generated using actual chlorinated hydrocarbon production for 2003 and 2004, and the HAP emissions generated per ton. The emission factors generated were then multiplied by 1.5 to produce more conservative emission factors. The above emission factors will be replaced with source-specific emission factors after the source completes testing of the chlorination process.