INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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Ms. Kellee Cobb
Reclaimed Energy Company
1500 Western Avenue,
Connersville, IN 47331

January 22, 2009

Re: 041-22783-00015
Review Request to
Part 70 Permit No.: T 041-21620-00015

Dear Ms. Cobb:

On March 10, 2006, Reclaimed Energy Company, Inc submitted a letter asking the Office of Air Quality (OAQ) various form of questions regarding their mobile distillation units used by the generators of spent solvents. The source is requesting for regulatory interpretation on several issues regarding air emissions as they pertain to mobile distillation units.

Question 1: If the company using these mobile distillation units has an air permit, whether is a Title V, FESOP or SOP, would the air emissions from this distillation equipment need to be calculated in with their potential to emit as well as their actual air emissions for the purposes of permit determination? If so, does the mobile equipment need to be included as a source in those permits?

Answer 1: If the source is using a mobile distillation unit, then the emissions from the mobile distillation unit will be included in determining the PTE of the source.

If the source owns and operates the mobile unit, it will be part of the source.

Question 2: If the equipment is not part of the company's "facility" and is not an "onsite source", then does the owner/operator of the mobile unit need to have an air permit covering the air emissions of the mobile distillation equipment?

Answer 2: Yes, the owner/operator of the mobile unit need an air permit if its emissions are above the exemption level. However, if the portable facility's business with the company or source exceeds 50%, then it may be a support facility of the company and source.

Question 3: Do the specific parts of the units such as pumps, need to comply with Subpart V (40 CFR 61.240) equipment leaks? If so, who is responsible for compliance, the company on whose property the mobile unit is located, or the owner/operator of the unit?

Answer 3 The pump may or may not be subject to 40 CFR 61.240 depending upon the applicability criteria for this rule. The source is responsible for compliance if the mobile unit is part of the source or support facility. If it is not part of the source, then the mobile unit owner is responsible for compliance.

Please contact Josiah Balogun, OAQ, 100 North Senate Avenue, MC 61-53, Room 1003, Indianapolis, Indiana, 46204-2251, or call at (800) 451-6027, and ask for Josiah Balogun or extension (4-5257), or dial (317) 234-5257.

Sincerely,

Tripurari Sinha

Tripurari P. Sinha, Ph.D. Section Chief
Permits Branch
Office of Air Quality

Enclosure: Review Request

cc: File – Fayette County
Fayette County Health Department
U.S. EPA, Region V
Inspector Name