



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: December 26, 2007
RE: Ashland Inc. / 141-23556-00125
FROM: Matthew Stuckey, Deputy Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, 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 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar 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.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot12/03/07



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Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

**Ashland Inc.
1817 W. Indiana Avenue
South Bend, Indiana 46613**

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

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. 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.

Indiana statutes from IC 13 and rules from 326 IAC, quoted 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 FESOP under 326 IAC 2-8.

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 2-8 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.: F 141-23556-00125	
Issued by: <i>Original signed by</i> Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 26, 2007 Expiration Date: December 26, 2012

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SECTION A SOURCE SUMMARY

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

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary chemical and solvent storage and distribution source.

Source Address:	1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address:	5200 Blazer Parkway, Dublin, OH 43017
General Source Phone Number:	614 – 790 – 4277
SIC Code:	5169
County Location:	St. Joseph
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD Rules Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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

- (a) Fourteen (14) organic liquid storage tanks, identified as T-1 - T-6, T-8 - T-13, T-17 and T-24, constructed in 1982, capacity: 10,600 gallons, each.
- (b) One (1) organic liquid storage tank, identified as T-71, constructed in 1982, capacity: 2,200 gallons.
- (c) One (1) organic liquid storage tank, identified as T-74, constructed in 1982, capacity: 2,100 gallons.
- (d) Two (2) organic liquid storage tanks, identified as T-72 and T-73, constructed in 1982, capacity: 2,000 gallons, each.
- (e) One (1) organic liquid storage tank, identified as T-16, constructed in 1982, capacity: 20,500 gallons.
- (f) Three (3) organic liquid storage tanks, identified as T-18, T-19 and T-23, constructed in 1982, capacity: 6,000 gallons, each.
- (g) One (1) organic liquid storage tank, identified as T-22, constructed in 1982, capacity: 8,700 gallons.
- (h) One (1) organic liquid storage tank, identified as T-25, constructed in 1982, capacity: 20,100 gallons.
- (i) One (1) organic liquid blend tank, identified as T-20, constructed in 1982, capacity: 3,500 gallons.
- (j) One (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1, constructed in 1982, capacity: 2,250,000 gallons per year.

- (k) One (1) organic liquid container filling area, identified as F-1, constructed in 1982 capacity: 2,250,000 gallons per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) boiler, constructed in 2005, heat input capacity: 0.245 million British thermal units per hour. [326 IAC 6-2-4]
 - (2) Three (3) water heaters, constructed in 1982, heat input capacity: 1.388 million British thermal units per hour, total.
 - (3) Two (2) space heaters, capacity: 0.175 million British thermal units per hour, total.
- (b) Electric air compressors.
- (c) Process vessel degassing and cleaning to prepare for internal repairs.
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (e) Underground storm water tank.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (h) One (1) soil vapor extraction and air sparging system, identified as SVE-AS, with a capacity of six (6) wells.
- (i) A diesel fuel dispensing facility, using a significant storage tank with a capacity of 10,600 gallons and dispensing less than or equal to 230,000 gallons per month.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 Permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

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 2-8-4(2)] [326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, F 141-23556-00125, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

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

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

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

B.4 Enforceability [326 IAC 2-8-6]

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

B.5 Severability [326 IAC 2-8-4(4)]

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 2-8-4(5)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (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 an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

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

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.10 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (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 2-8-12]

- (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 except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or 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 Northern Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865
Northern Regional Office phone: 574-245-4870; fax: 574-245-4877

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

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

Northern Regional Office
220 W. Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

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 2-8-4(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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) 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.

- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

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

- (a) All terms and conditions of permits established prior to F 141-23556-00125 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

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 2-8-3(h) and 326 IAC 2-8-9.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

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

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

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

The Quarterly Deviation and Compliance Monitoring Report does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Federally Enforceable State Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

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

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

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

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10 (b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs remove this condition in FESOP

- (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 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-8-15(b) through (d) 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 approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

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

and

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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) **Emission Trades [326 IAC 2-8-15(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 2-8-15(c).
- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(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 2-8-4(7). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.22 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-17-3-2] [IC13-30-3-1]

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, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP 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, at reasonable times, 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, at reasonable times, 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, at reasonable times, 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 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

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

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

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

B.25 Credible Evidence [326 IAC 2-8-4(3)] [326 IAC 2-8-5] [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 2-8-4(1)]

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

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

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 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 thirty percent (30%) 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.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

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

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

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

C.6 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.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 two hundred sixty (260) linear feet on pipes or one hundred sixty (160) square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

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

The notice shall include a signed certification from the owner or operator that the information

provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least seventy-five hundredths (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).

Testing Requirements [326 IAC 2-8-4(3)]

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
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.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 by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

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

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

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

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

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

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

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

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (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 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.13 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq)) **at an existing emissions unit other than a project at a source** with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr)), the Permittee shall comply with the following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
 - (i) Baseline actual emissions;
 - (ii) Projected actual emissions;
 - (iii) Amount of emissions excluded under section 326 IAC 2-2-1(rr)(2)(A)(iii); and
 - (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.14 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by an

"authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

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

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C - General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

C.15 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 2-8-4(1)]: Storage Tanks and Loading Rack

- (a) Fourteen (14) organic liquid storage tanks, identified as T-1 - T-6, T-8 - T-13, T-17 and T-24, constructed in 1982, capacity: 10,600 gallons, each.
- (b) One (1) organic liquid storage tank, identified as T-71, constructed in 1982, capacity: 2,200 gallons.
- (c) One (1) organic liquid storage tank, identified as T-74, constructed in 1982, capacity: 2,100 gallons.
- (d) Two (2) organic liquid storage tanks, identified as T-72 and T-73, constructed in 1982, capacity: 2,000 gallons, each.
- (e) One (1) organic liquid storage tank, identified as T-16, constructed in 1982, capacity: 20,500 gallons.
- (f) Three (3) organic liquid storage tanks, identified as T-18, T-19 and T-23, constructed in 1982, capacity: 6,000 gallons, each.
- (g) One (1) organic liquid storage tank, identified as T-22, constructed in 1982, capacity: 8,700 gallons.
- (h) One (1) organic liquid storage tank, identified as T-25, constructed in 1982, capacity: 20,100 gallons.
- (i) One (1) organic liquid blend tank, identified as T-20, constructed in 1982, capacity: 3,500 gallons.
- (j) One (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1, constructed in 1982, capacity: 2,250,000 gallons per year.
- (k) One (1) organic liquid container filling area, identified as F-1, constructed in 1982 capacity: 2,250,000 gallons per year.

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total throughput of chemicals at this source shall not exceed 2,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding methylene chloride and 1,1,2-trichloroethylene.
- (b) The total throughput of methylene chloride shall not exceed 75,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total throughput of 1,1,2-trichloroethylene shall not exceed 25,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The total throughput of each individual HAP at this source shall not exceed 950,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding methylene chloride and 1,1,2-trichloroethylene.

Compliance with these throughput limits combined with the unrestricted potential to emit HAPs from all other facilities at the source, shall limit the potential to emit any single HAP to less than ten (10)

tons per year, and the potential to emit the total combined HAPs to less than twenty-five (25) tons per year, and shall render the requirements of 326 IAC 2-7, Part 70 not applicable to the source.

D.1.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.3 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

- (1) Total chemical throughput;
- (2) Identification of each chemical and the throughput of each chemical;
- (3) Individual and total HAP content of each chemical;
- (4) Individual HAP throughputs for each individual HAP;
- (5) Methylene chloride throughput; and
- (6) 1,1,2-trichloroethylene throughput.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.4 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address 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 "authorized individual" as defined by 326 IAC 2-1.1-1(1).

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [326 IAC 2-8-4(1)]

D.1.5 General Provisions Relating to NESHAP FF [326 IAC 14-1] [40 CFR Part 61, Subpart A]

Pursuant to 40 CFR 61.340, the Permittee shall comply with the provisions of 40 CFR Part 61, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 14-1 for the twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1 as specified in Appendix A of 40 CFR Part 61, Subpart FF in accordance with schedule in 40 CFR 61, Subpart FF.

D.1.6 National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations [40 CFR Part 61, Subpart FF]

Pursuant to CFR Part 61, Subpart FF, the Permittee shall comply with the provisions of 40 CFR Part 61, Subpart FF, which are incorporated by reference as 326 IAC 14 for the twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1 as specified as follows.

§ 61.340 Applicability.

(a) The provisions of this subpart apply to owners and operators of chemical manufacturing plants, coke by-product recovery plants, and petroleum refineries.

(b) The provisions of this subpart apply to owners and operators of hazardous waste treatment, storage, and disposal facilities that treat, store, or dispose of hazardous waste generated by any facility listed in paragraph (a) of this section. The waste streams at hazardous waste treatment, storage, and disposal facilities subject to the provisions of this subpart are the benzene-containing hazardous waste from any facility listed in paragraph (a) of this section. A hazardous waste treatment, storage, and disposal facility is a facility that must obtain a hazardous waste management permit under subtitle C of the Solid Waste Disposal Act.

§ 61.341 Definitions.

Benzene concentration means the fraction by weight of benzene in a waste as determined in accordance with the procedures specified in §61.355 of this subpart.

Car-seal means a seal that is placed on a device that is used to change the position of a valve (e.g., from opened to closed) in such a way that the position of the valve cannot be changed without breaking the seal.

Chemical manufacturing plant means any facility engaged in the production of chemicals by chemical, thermal, physical, or biological processes for use as a product, co-product, by-product, or intermediate including but not limited to industrial organic chemicals, organic pesticide products, pharmaceutical preparations, paint and allied products, fertilizers, and agricultural chemicals. Examples of chemical manufacturing plants include facilities at which process units are operated to produce one or more of the following chemicals: benzenesulfonic acid, benzene, chlorobenzene, cumene, cyclohexane, ethylene, ethylbenzene, hydroquinone, linear alkylbenzene, nitrobenzene, resorcinol, sulfolane, or styrene.

Closed-vent system means a system that is not open to the atmosphere and is composed of piping, ductwork, connections, and, if necessary, flow inducing devices that transport gas or vapor from an emission source to a control device.

Coke by-product recovery plant means any facility designed and operated for the separation and recovery of coal tar derivatives (by-products) evolved from coal during the coking process of a coke oven battery.

Container means any portable waste management unit in which a material is stored, transported, treated, or otherwise handled. Examples of containers are drums, barrels, tank trucks, barges, dumpsters, tank cars, dump trucks, and ships.

Control device means an enclosed combustion device, vapor recovery system, or flare.

Cover means a device or system which is placed on or over a waste placed in a waste management unit so that the entire waste surface area is enclosed and sealed to minimize air emissions. A cover may have openings necessary for operation, inspection, and maintenance of the waste management unit such as access hatches, sampling ports, and gauge wells provided that each opening is closed and sealed when not in use. Example of covers include a fixed roof installed on a tank, a lid installed on a container, and an air-supported enclosure installed over a waste management unit.

External floating roof means a pontoon-type or double-deck type cover with certain rim sealing mechanisms that rests on the liquid surface in a waste management unit with no fixed roof.

Facility means all process units and product tanks that generate waste within a stationary source, and all waste management units that are used for waste treatment, storage, or disposal within a stationary source.

Fixed roof means a cover that is mounted on a waste management unit in a stationary manner and that does not move with fluctuations in liquid level.

Floating roof means a cover with certain rim sealing mechanisms consisting of a double deck, pontoon single deck, internal floating cover or covered floating roof, which rests upon and is supported by the liquid being contained, and is equipped with a closure seal or seals to close the space between the roof edge and unit wall.

Flow indicator means a device which indicates whether gas flow is present in a line or vent system.

Fuel gas system means the offsite and onsite piping and control system that gathers gaseous streams generated by facility operations, may blend them with sources of gas, if available, and transports the blended gaseous fuel at suitable pressures for use as fuel in heaters, furnaces, boilers, incinerators, gas turbines, and other combustion devices located within or outside the facility. The fuel is piped directly to each individual combustion device, and the system typically operates at pressures over atmospheric.

Individual drain system means the system used to convey waste from a process unit, product storage tank, or waste management unit to a waste management unit. The term includes all process drains and common junction boxes, together with their associated sewer lines and other junction boxes, down to the receiving waste management unit.

Internal floating roof means a cover that rests or floats on the liquid surface inside a waste management unit that has a fixed roof.

Liquid-mounted seal means a foam or liquid-filled primary seal mounted in contact with the liquid between the waste management unit wall and the floating roof continuously around the circumference.

Loading means the introduction of waste into a waste management unit but not necessarily to complete capacity (also referred to as filling).

Maximum organic vapor pressure means the equilibrium partial pressure exerted by the waste at the temperature equal to the highest calendar-month average of the waste storage temperature for waste stored above or below the ambient temperature or at the local maximum monthly average temperature as reported by the National Weather Service for waste stored at the ambient temperature, as determined:

- (1) In accordance with §60.17(c); or
- (2) As obtained from standard reference texts; or
- (3) In accordance with §60.17(a)(37); or
- (4) Any other method approved by the Administrator.

No detectable emissions means less than 500 parts per million by volume (ppmv) above background levels, as measured by a detection instrument reading in accordance with the procedures specified in §61.355(h) of this subpart.

Oil-water separator means a waste management unit, generally a tank or surface impoundment, used to separate oil from water. An oil-water separator consists of not only the separation unit but also the forebay and other separator basins, skimmers, weirs, grit chambers, sludge hoppers, and bar screens that are located directly after the individual drain system and prior to additional treatment units such as an air flotation unit, clarifier, or biological treatment unit. Examples of an oil-water separator include an API separator, parallel-plate interceptor, and corrugated-plate interceptor with the associated ancillary equipment.

Petroleum refinery means any facility engaged in producing gasoline, kerosene, distillate fuel oils, residual fuel oils, lubricants, or other products through the distillation of petroleum, or through the redistillation, cracking, or reforming of unfinished petroleum derivatives.

Petroleum means the crude oil removed from the earth and the oils derived from tar sands, shale, and

coal.

Point of waste generation means the location where the waste stream exits the process unit component or storage tank prior to handling or treatment in an operation that is not an integral part of the production process, or in the case of waste management units that generate new wastes after treatment, the location where the waste stream exits the waste management unit component.

Process unit means equipment assembled and connected by pipes or ducts to produce intermediate or final products. A process unit can be operated independently if supplied with sufficient fuel or raw materials and sufficient product storage facilities.

Process unit turnaround means the shutting down of the operations of a process unit, the purging of the contents of the process unit, the maintenance or repair work, followed by restarting of the process.

Process unit turnaround waste means a waste that is generated as a result of a process unit turnaround.

Process wastewater means water which comes in contact with benzene during manufacturing or processing operations conducted within a process unit. Process wastewater is not organic wastes, process fluids, product tank drawdown, cooling tower blowdown, steam trap condensate, or landfill leachate.

Process wastewater stream means a waste stream that contains only process wastewater.

Product tank means a stationary unit that is designed to contain an accumulation of materials that are fed to or produced by a process unit, and is constructed primarily of non-earthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.

Product tank drawdown means any material or mixture of materials discharged from a product tank for the purpose of removing water or other contaminants from the product tank.

Safety device means a closure device such as a pressure relief valve, frangible disc, fusible plug, or any other type of device which functions exclusively to prevent physical damage or permanent deformation to a unit or its air emission control equipment by venting gases or vapors directly to the atmosphere during unsafe conditions resulting from an unplanned, accidental, or emergency event. For the purpose of this subpart, a safety device is not used for routine venting of gases or vapors from the vapor headspace underneath a cover such as during filling of the unit or to adjust the pressure in this vapor headspace in response to normal daily diurnal ambient temperature fluctuations. A safety device is designed to remain in a closed position during normal operations and open only when the internal pressure, or another relevant parameter, exceeds the device threshold setting applicable to the air emission control equipment as determined by the owner or operator based on manufacturer recommendations, applicable regulations, fire protection and prevention codes, standard engineering codes and practices, or other requirements for the safe handling of flammable, ignitable, explosive, reactive, or hazardous materials.

Segregated stormwater sewer system means a drain and collection system designed and operated for the sole purpose of collecting rainfall runoff at a facility, and which is segregated from all other individual drain systems.

Sewer line means a lateral, trunk line, branch line, or other enclosed conduit used to convey waste to a downstream waste management unit.

Slop oil means the floating oil and solids that accumulate on the surface of an oil-water separator.

Sour water stream means a stream that:

- (1) Contains ammonia or sulfur compounds (usually hydrogen sulfide) at concentrations of 10 ppm by weight or more;
- (2) Is generated from separation of water from a feed stock, intermediate, or product that contained

ammonia or sulfur compounds; and

(3) Requires treatment to remove the ammonia or sulfur compounds.

Sour water stripper means a unit that:

(1) Is designed and operated to remove ammonia or sulfur compounds (usually hydrogen sulfide) from sour water streams;

(2) Has the sour water streams transferred to the stripper through hard piping or other enclosed system; and

(3) Is operated in such a manner that the offgases are sent to a sulfur recovery unit, processing unit, incinerator, flare, or other combustion device.

Surface impoundment means a waste management unit which is a natural topographic depression, man-made excavation, or diked area formed primarily of earthen materials (although it may be lined with man-made materials), which is designed to hold an accumulation of liquid wastes or waste containing free liquids, and which is not an injection well. Examples of surface impoundments are holding, storage, settling, and aeration pits, ponds, and lagoons.

Tank means a stationary waste management unit that is designed to contain an accumulation of waste and is constructed primarily of nonearthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.

Treatment process means a stream stripping unit, thin-film evaporation unit, waste incinerator, or any other process used to comply with §61.348 of this subpart.

Vapor-mounted seal means a foam-filled primary seal mounted continuously around the perimeter of a waste management unit so there is an annular vapor space underneath the seal. The annular vapor space is bounded by the bottom of the primary seal, the unit wall, the liquid surface, and the floating roof.

Waste means any material resulting from industrial, commercial, mining or agricultural operations, or from community activities that is discarded or is being accumulated, stored, or physically, chemically, thermally, or biologically treated prior to being discarded, recycled, or discharged.

Waste management unit means a piece of equipment, structure, or transport mechanism used in handling, storage, treatment, or disposal of waste. Examples of a waste management unit include a tank, surface impoundment, container, oil-water separator, individual drain system, steam stripping unit, thin-film evaporation unit, waste incinerator, and landfill.

Waste stream means the waste generated by a particular process unit, product tank, or waste management unit. The characteristics of the waste stream (e.g., flow rate, benzene concentration, water content) are determined at the point of waste generation. Examples of a waste stream include process wastewater, product tank drawdown, sludge and slop oil removed from waste management units, and landfill leachate.

Wastewater treatment system means any component, piece of equipment, or installation that receives, manages, or treats process wastewater, product tank drawdown, or landfill leachate prior to direct or indirect discharge in accordance with the National Pollutant Discharge Elimination System permit regulations under 40 CFR part 122. These systems typically include individual drain systems, oil-water separators, air flotation units, equalization tanks, and biological treatment units.

Water seal controls means a seal pot, p-leg trap, or other type of trap filled with water (e.g., flooded sewers that maintain water levels adequate to prevent air flow through the system) that creates a water barrier between the sewer line and the atmosphere. The water level of the seal must be maintained in the vertical leg of a drain in order to be considered a water seal.

[55 FR 8346, Mar. 7, 1990; 55 FR 12444, Apr. 3, 1990, as amended at 58 FR 3095, Jan. 7, 1993; 67 FR 68531, Nov. 12, 2002]

§ 61.342 Standards: General.

(a) An owner or operator of a facility at which the total annual benzene quantity from facility waste is less than 10 megagrams per year (Mg/yr) (11 ton/yr) shall be exempt from the requirements of paragraphs (b) and (c) of this section. The total annual benzene quantity from facility waste is the sum of the annual benzene quantity for each waste stream at the facility that has a flow-weighted annual average water content greater than 10 percent or that is mixed with water, or other wastes, at any time and the mixture has an annual average water content greater than 10 percent. The benzene quantity in a waste stream is to be counted only once without multiple counting if other waste streams are mixed with or generated from the original waste stream. Other specific requirements for calculating the total annual benzene waste quantity are as follows:

(1) Wastes that are exempted from control under §§61.342(c)(2) and 61.342(c)(3) are included in the calculation of the total annual benzene quantity if they have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(2) The benzene in a material subject to this subpart that is sold is included in the calculation of the total annual benzene quantity if the material has an annual average water content greater than 10 percent.

(3) Benzene in wastes generated by remediation activities conducted at the facility, such as the excavation of contaminated soil, pumping and treatment of groundwater, and the recovery of product from soil or groundwater, are not included in the calculation of total annual benzene quantity for that facility. If the facility's total annual benzene quantity is 10 Mg/yr (11 ton/yr) or more, wastes generated by remediation activities are subject to the requirements of paragraphs (c) through (h) of this section. If the facility is managing remediation waste generated offsite, the benzene in this waste shall be included in the calculation of total annual benzene quantity in facility waste, if the waste streams have an annual average water content greater than 10 percent, or if they are mixed with water or other wastes at any time and the mixture has an annual average water content greater than 10 percent.

(4) The total annual benzene quantity is determined based upon the quantity of benzene in the waste before any waste treatment occurs to remove the benzene except as specified in §61.355(c)(1)(i) (A) through (C).

§ 61.355 Test methods, procedures, and compliance provisions.

(a) An owner or operator shall determine the total annual benzene quantity from facility waste by the following procedure:

(1) For each waste stream subject to this subpart having a flow-weighted annual average water content greater than 10 percent water, on a volume basis as total water, or is mixed with water or other wastes at any time and the resulting mixture has an annual average water content greater than 10 percent as specified in §61.342(a), the owner or operator shall:

(i) Determine the annual waste quantity for each waste stream using the procedures specified in paragraph (b) of this section.

(ii) Determine the flow-weighted annual average benzene concentration for each waste stream using the procedures specified in paragraph (c) of this section.

(iii) Calculate the annual benzene quantity for each waste stream by multiplying the annual waste quantity of the waste stream times the flow-weighted annual average benzene concentration.

(2) Total annual benzene quantity from facility waste is calculated by adding together the annual benzene

quantity for each waste stream generated during the year and the annual benzene quantity for each process unit turnaround waste annualized according to paragraph (b)(4) of this section.

(4) If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall:

(i) Comply with the recordkeeping requirements of §61.356 and reporting requirements of §61.357 of this subpart; and

(ii) Repeat the determination of total annual benzene quantity from facility waste at least once per year and whenever there is a change in the process generating the waste that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more.

(b) For purposes of the calculation required by paragraph (a) of this section, an owner or operator shall determine the annual waste quantity at the point of waste generation, unless otherwise provided in paragraphs (b) (1), (2), (3), and (4) of this section, by one of the methods given in paragraphs (b) (5) through (7) of this section.

(3) The determination of annual waste quantity for wastes that are received at hazardous waste treatment, storage, or disposal facilities from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.

(c) For the purposes of the calculation required by §§61.355(a) of this subpart, an owner or operator shall determine the flow-weighted annual average benzene concentration in a manner that meets the requirements given in paragraph (c)(1) of this section using either of the methods given in paragraphs (c)(2) and (c)(3) of this section.

(1) The determination of flow-weighted annual average benzene concentration shall meet all of the following criteria:

(i) The determination shall be made at the point of waste generation except for the specific cases given in paragraphs (c)(1)(i)(A) through (D) of this section.

(C) The determination for wastes that are received from offsite shall be made at the point where the waste enters the hazardous waste treatment, storage, or disposal facility.

(2) *Knowledge of the waste.* The owner or operator shall provide sufficient information to document the flow-weighted annual average benzene concentration of each waste stream. Examples of information that could constitute knowledge include material balances, records of chemicals purchases, or previous test results provided the results are still relevant to the current waste stream conditions. If test data are used, then the owner or operator shall provide documentation describing the testing protocol and the means by which sampling variability and analytical variability were accounted for in the determination of the flow-weighted annual average benzene concentration for the waste stream. When an owner or operator and the Administrator do not agree on determinations of the flow-weighted annual average benzene concentration based on knowledge of the waste, the procedures under paragraph (c)(3) of this section shall be used to resolve the disagreement.

(3) Measurements of the benzene concentration in the waste stream in accordance with the following procedures:

(i) Collect a minimum of three representative samples from each waste stream. Where feasible, samples shall be taken from an enclosed pipe prior to the waste being exposed to the atmosphere.

(ii) For waste in enclosed pipes, the following procedures shall be used:

(A) Samples shall be collected prior to the waste being exposed to the atmosphere in order to minimize the loss of benzene prior to sampling.

(B) A static mixer shall be installed in the process line or in a by-pass line unless the owner or operator demonstrates that installation of a static mixer in the line is not necessary to accurately determine the benzene concentration of the waste stream.

(C) The sampling tap shall be located within two pipe diameters of the static mixer outlet.

(D) Prior to the initiation of sampling, sample lines and cooling coil shall be purged with at least four volumes of waste.

(E) After purging, the sample flow shall be directed to a sample container and the tip of the sampling tube shall be kept below the surface of the waste during sampling to minimize contact with the atmosphere.

(F) Samples shall be collected at a flow rate such that the cooling coil is able to maintain a waste temperature less than 10 °C (50 °F).

(G) After filling, the sample container shall be capped immediately (within 5 seconds) to leave a minimum headspace in the container.

(H) The sample containers shall immediately be cooled and maintained at a temperature below 10 °C (50 °F) for transfer to the laboratory.

§ 61.356 Recordkeeping requirements.

(a) Each owner or operator of a facility subject to the provisions of this subpart shall comply with the recordkeeping requirements of this section. Each record shall be maintained in a readily accessible location at the facility site for a period not less than two years from the date the information is recorded unless otherwise specified.

(b) Each owner or operator shall maintain records that identify each waste stream at the facility subject to this subpart, and indicate whether or not the waste stream is controlled for benzene emissions in accordance with this subpart. In addition the owner or operator shall maintain the following records:

(1) For each waste stream not controlled for benzene emissions in accordance with this subpart, the records shall include all test results, measurements, calculations, and other documentation used to determine the following information for the waste stream: waste stream identification, water content, whether or not the waste stream is a process wastewater stream, annual waste quantity, range of benzene concentrations, annual average flow-weighted benzene concentration, and annual benzene quantity.

§ 61.357 Reporting requirements.

(a) Each owner or operator of a chemical plant, petroleum refinery, coke by-product recovery plant, and any facility managing wastes from these industries shall submit to the Administrator within 90 days after January 7, 1993, or by the initial startup for a new source with an initial startup after the effective date, a report that summarizes the regulatory status of each waste stream subject to §61.342 and is determined by the procedures specified in §61.355(c) to contain benzene. Each owner or operator subject to this subpart who has no benzene onsite in wastes, products, by-products, or intermediates shall submit an initial report that is a statement to this effect. For all other owners or operators subject to this subpart, the report shall include the following information:

(1) Total annual benzene quantity from facility waste determined in accordance with §61.355(a) of this subpart.

(2) A table identifying each waste stream and whether or not the waste stream will be controlled for benzene emissions in accordance with the requirements of this subpart.

(3) For each waste stream identified as not being controlled for benzene emissions in accordance with the

requirements of this subpart the following information shall be added to the table:

- (i) Whether or not the water content of the waste stream is greater than 10 percent;
 - (ii) Whether or not the waste stream is a process wastewater stream, product tank drawdown, or landfill leachate;
 - (iii) Annual waste quantity for the waste stream;
 - (iv) Range of benzene concentrations for the waste stream;
 - (v) Annual average flow-weighted benzene concentration for the waste stream; and
 - (vi) Annual benzene quantity for the waste stream.
- (4) The information required in paragraphs (a) (1), (2), and (3) of this section should represent the waste stream characteristics based on current configuration and operating conditions. An owner or operator only needs to list in the report those waste streams that contact materials containing benzene. The report does not need to include a description of the controls to be installed to comply with the standard or other information required in §61.10(a).
- (c) If the total annual benzene quantity from facility waste is less than 10 Mg/yr (11 ton/yr) but is equal to or greater than 1 Mg/yr (1.1 ton/yr), then the owner or operator shall submit to the Administrator a report that updates the information listed in paragraphs (a)(1) through (a)(3) of this section. The report shall be submitted annually and whenever there is a change in the process generating the waste stream that could cause the total annual benzene quantity from facility waste to increase to 10 Mg/yr (11 ton/yr) or more. If the information in the annual report required by paragraphs (a)(1) through (a)(3) of this section is not changed in the following year, the owner or operator may submit a statement to that effect.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(1)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) boiler, constructed in 2005, heat input capacity: 0.245 million British thermal units per hour. [326 IAC 6-2-4]

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

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the one (1) insignificant boiler shall be limited to 0.6 pounds per million British thermal units heat input.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Ashland Inc.
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

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:

Date:

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

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Ashland Inc.
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

FESOP Quarterly Report

Source Name: Ashland Inc.
 Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
 Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
 FESOP No.: F 141-23556-00125
 Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
 Parameter: Total chemical throughput.
 Limit: Less than 2,000,000 gallons, excluding methylene chloride and 1,1,4-2-trichloroethylene, per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Chemical Throughput (gallons)	Chemical Throughput (gallons)	Chemical Throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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**

FESOP Quarterly Report

Source Name: Ashland Inc.
 Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
 Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
 FESOP No.: F 141-23556-00125
 Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
 Parameter: Worst case individual HAP throughput.
 Limit: Less than 950,000 gallons, excluding methylene chloride and 1,1,2-trichloroethylene, per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Worst case individual HAP throughput (gallons)	Worst case individual HAP throughput (gallons)	Worst case individual HAP throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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**

FESOP Quarterly Report

Source Name: Ashland Inc.
 Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
 Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
 FESOP No.: F 141-23556-00125
 Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
 Parameter: Methylene chloride throughput.
 Limit: Less than 75,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	Methylene chloride throughput (gallons)	Methylene chloride throughput (gallons)	Methylene chloride throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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**

FESOP Quarterly Report

Source Name: Ashland Inc.
 Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
 Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
 FESOP No.: F 141-23556-00125
 Facility: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
 Parameter: 1,1,2-trichloroethylene throughput.
 Limit: Less than 25,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	1,1,2-trichloroethylene throughput (gallons)	1,1,2-trichloroethylene throughput (gallons)	1,1,2-trichloroethylene throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Ashland Inc.
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

Months: _____ to _____ Year: _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked ΔNo deviations occurred this reporting period@.</p>	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	Ashland Inc.
Source Location:	1817 W. Indiana Avenue, South Bend, Indiana 46613
County:	St. Joseph
SIC Code:	5169
Permit Renewal No.:	F 141-23556-00125
Permit Reviewer:	Timothy R. Pettifor

On October 12, 2007, the Office of Air Quality (OAQ) had a notice published in The South Bend Tribune, South Bend, Indiana, stating that Ashland Inc. had applied for a FESOP renewal to operate a chemical and solvent storage and distribution source. 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 December 13, 2007, Linda J. Denison of Ashland Inc. submitted comments on the proposed FESOP renewal. The comments are as follows: the permit language if changed, has deleted language as ~~strikeouts~~ and the new language **bolded**.

Comment 1:

All references to the facility should be changed to read as "Ashland Inc." rather than Ashland Distribution Company, a division of Ashland Inc. Additionally, the permit makes mention of 1,1,1-trichloroethylene. It should read 1,1,2-trichloroethylene.

Response 1:

IDEM has changed the references to the facility on the title page and the reporting forms to Ashland Inc. IDEM has also changed 1,1,1-trichloroethylene to 1,1,2 trichloroethylene in Conditions D.1.1 and D.1.3 (a) (6) and the reporting forms. No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result, ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Federally Enforceable State Operating Permit Renewal OFFICE OF AIR QUALITY

~~Ashland Distribution Company, A Division of Ashland Inc.~~
1817 W. Indiana Avenue
South Bend, Indiana 46613

(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.

D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4]

- (a) The total throughput of chemicals at this source shall not exceed 2,000,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding methylene chloride and 1,1,4 **2**-trichloroethylene.
- (b) The total throughput of methylene chloride shall not exceed 75,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (c) The total throughput of 1,1,4 **2**-trichloroethylene shall not exceed 25,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (d) The total throughput of each individual HAP at this source shall not exceed 950,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month, excluding methylene chloride and 1,1,4 **2**-trichloroethylene.

D.1.3 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs usage limits established in Condition D.1.1. Records necessary to demonstrate compliance shall be available within thirty (30) days of the end of each compliance period.

(6) 1,1,4 **2**-trichloroethylene throughput.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

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

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

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

FESOP Quarterly Report

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125
Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
Parameter: Total chemical throughput.
Limit: Less than 2,000,000 gallons, excluding methylene chloride and 1,1,4 2-trichloroethylene, per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125
Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
Parameter: Worst case individual HAP throughput.
Limit: Less than 950,000 gallons, excluding methylene chloride and 1,1,4 2-trichloroethylene, per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125
Facilities: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
Parameter: Methylene chloride throughput.
Limit: Less than 75,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

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

FESOP Quarterly Report

Source Name: Ashland ~~Distribution Company, A Division of Ashland Inc.~~
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

Facility: The twenty-five (25) storage tanks, the one (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1 and the one (1) organic liquid container filling area, identified as F-1.
 Parameter: 1,1,4 2-trichloroethylene throughput.
 Limit: Less than 25,000 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month.

QUARTER: _____ YEAR: _____

Month	1,1,4 2-trichloroethylene throughput (gallons)	1,1,4-2-trichloroethylene throughput (gallons)	1,1,4 2-trichloroethylene throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

- 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.

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Ashland ~~Distribution Company~~, A Division of Ashland Inc.
Source Address: 1817 W. Indiana Avenue, South Bend, Indiana 46613
Mailing Address: 5200 Blazer Parkway, Dublin, OH 43017
FESOP No.: F 141-23556-00125

IDEM, OAQ has also made the following change to the signature block on the cover page.

Operation Permit No.: F 141-23556-00125	
Issued by: Nicha Sizemore, Chief Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: Expiration Date:

This change reflects recent changes in OAQ staff and signature delegation.

**Addendum to Appendix A: Emissions Calculations
VOC and HAP Emissions
Unloading/Loading & Filling Areas**

Company Name: Ashland Distribution Company, A Division of Ashland Inc.
Address City IN Zip: 1817 West Indiana Avenue, South Bend, IN 46613
Permit Number: F 141-23556-00125
Reviewer: Kyle Gregory/MES/Timothy R. Pettifor
Date: December 26, 2007

Uncontrolled Potential to Emit

VOC

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit VOC (lbs/yr)	Potential to Emit VOC (tons/yr)
Bay tank wagon loading/unloading rack	0.6	3.585	58.08	68	2.95	2250000	6633.36	3.32
Container Filling Area	1.45	3.585	58.08	68	7.12	2250000	16030.62	8.02
Worst Case:							16031	8.02

HAPs, excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2250000	6442.98	3.22
Container Filling Area	1.45	2.347	86.17	68	6.92	2250000	15570.55	7.79
Worst Case:							15571	7.79

HAPs, maximum individual excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2250000	6442.98	3.22
Container Filling Area	1.45	2.347	86.17	68	6.92	2250000	15570.55	7.79
Worst Case:							15571	7.79

Methylene chloride

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	6.784	84.94	68	8.16	2250000	18357.60	9.179
Container Filling Area	1.45	6.784	84.94	68	19.72	2250000	44364.21	22.182
Worst Case:							44364	22.2

1,1,1,2 - Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Container Filling Area	1.45	2.044	133.42	68	9.33	2250000	20996.00	10.498
Worst Case:							20996	10.5

Limited Potential to Emit

HAPs, excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2000000	5727.10	2.86
Container Filling Area	1.45	2.347	86.17	68	6.92	2000000	13840.48	6.92
Limited:							13840	6.92

HAPs, maximum individual excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	950000	2720.37	1.36
Container Filling Area	1.45	2.347	86.17	68	6.92	950000	6574.23	3.29
Limited:							6574	3.29

Methylene chloride

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	6.784	84.94	68	8.16	75000	611.92	0.306
Container Filling Area	1.45	6.784	84.94	68	19.72	75000	1478.81	0.739
Limited:							1479	0.739

1,1,1,2 - Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Container Filling Area	1.45	2.044	133.42	68	9.33	25000	233.29	0.117
Limited:							233	0.117

Methodology

Maximum PTE when operating at throughput limits using worst case chemicals and worst case loading/unloading method.
Variables provided by applicant.
Equations from AP-42, Chapter 5.2.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
Federally Enforceable State Operating Permit Renewal

Source Background and Description

Source Name:	Ashland Distribution Company, A Division of Ashland Inc.
Source Location:	1817 W. Indiana Avenue, South Bend, Indiana 46613
County:	St. Joseph
SIC Code:	5169
Permit Renewal No.:	F 141-23556-00125
Permit Reviewer:	Kyle Gregory/MES

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from Ashland Distribution Company, A Division of Ashland Inc. relating to the operation of a chemical and solvent storage and distribution source.

History

On August 25, 2006, Ashland Distribution Company, A Division of Ashland Inc. submitted an application to the OAQ requesting to renew its first operating permit renewal. Ashland Distribution Company, A Division of Ashland Inc. was issued a FESOP Renewal on May 24, 2002.

Permitted Emission Units and Pollution Control Equipment

- (a) Fourteen (14) organic liquid storage tanks, identified as T-1 - T-6, T-8 - T-13, T-17 and T-24, constructed in 1982, capacity: 10,600 gallons, each.
- (b) One (1) organic liquid storage tank, identified as T-71, constructed in 1982, capacity: 2,200 gallons.
- (c) One (1) organic liquid storage tank, identified as T-74, constructed in 1982, capacity: 2,100 gallons.
- (d) Two (2) organic liquid storage tanks, identified as T-72 and T-73, constructed in 1982, capacity: 2,000 gallons, each.
- (e) One (1) organic liquid storage tank, identified as T-16, constructed in 1982, capacity: 20,500 gallons.
- (f) Three (3) organic liquid storage tanks, identified as T-18, T-19 and T-23, constructed in 1982, capacity: 6,000 gallons, each.
- (g) One (1) organic liquid storage tank, identified as T-22, constructed in 1982, capacity: 8,700 gallons.
- (h) One (1) organic liquid storage tank, identified as T-25, constructed in 1982, capacity: 20,100 gallons.
- (i) One (1) organic liquid blend tank, identified as T-20, constructed in 1982, capacity: 3,500 gallons.
- (j) One (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1, constructed in 1982, capacity: 2,250,000 gallons per year.

- (k) One (1) organic liquid container filling area, identified as F-1, constructed in 1982, capacity: 2,250,000 gallons per year.

Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) One (1) boiler, constructed in 2005, exhausting through stack S2, heat input capacity: 0.245 million British thermal units per hour. [326 IAC 6-2-4]
 - (2) Three (3) water heaters, constructed in 1982, heat input capacity: 1.388 million British thermal units per hour, total.
 - (3) Two (2) space heaters, capacity: 0.175 million British thermal units per hour, total.
- (b) Electric air compressors.
- (c) Process vessel degassing and cleaning to prepare for internal repairs.
- (d) Paved and unpaved roads and parking lots with public access. [326 IAC 6-4]
- (e) Underground storm water tank.
- (f) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (g) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (h) One (1) soil vapor extraction and air sparging system, identified as SVE-AS, with a capacity of six (6) wells.
- (i) A diesel fuel dispensing facility, using a significant storage tank with a capacity of 10,600 gallons and dispensing less than or equal to 230,000 gallons per month.

Existing Approvals

Since the issuance of the FESOP 141-14139-00125 on May 24, 2002, the source has constructed or has been operating under the following approvals as well:

- (a) Administrative Amendment No. 141-18277-00125, issued on November 5, 2003; and
- (b) Administrative Amendment No. 141-20144-00125, issued on December 9, 2004; and
- (c) Administrative Amendment No. 141-20872-00125, issued on March 18, 2005.

All terms and conditions from previous approvals were either incorporated as originally stated, revised or deleted by this FESOP. The following terms and conditions have been revised:

Condition D.2.1: Pursuant to 326 IAC 6-2-3(e), the PM emissions from the one (1) insignificant boiler and three (3) insignificant water heaters, all constructed in 1982 and having a total heat input capacity of 1.588 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

Reason revised: The three (3) insignificant water heaters are not considered to be sources of indirect heating pursuant to 326 IAC 6-2. Therefore they do not have any applicable requirements under 326 IAC 6-2 and are no longer included in this condition.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S1	Organic Container Filling	22	0.67	1000	68
S2	Boiler	23	0.83	2000	120

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 4).

County Attainment Status

The source is located in St. Joseph County

Pollutant	Status
PM ₁₀	Attainment
PM _{2.5}	Attainment
SO ₂	Attainment
NO _x	Attainment
8-hour Ozone	Attainment
CO	Attainment
Lead	Attainment

Note: On September 6, 2007 the Indiana Air Pollution Control Board finalized a temporary emergency rule to redesignate Allen, Clark, Elkhart, Floyd, LaPorte, St. Joseph as attainment for the 8-hour ozone standard.

- (a) St. Joseph County has been classified as attainment for PM_{2.5}. U.S. EPA has not yet established the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM_{2.5} emissions. Therefore, until the U.S. EPA adopts specific provisions for PSD review for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions. See the State Rule Applicability – Entire Source section.
- (b) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC emissions and NO_x emissions are considered when evaluating the rule applicability relating to ozone. St. Joseph County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (c) St. Joseph County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the

- requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability – Entire Source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.
- (e) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD or Emission Offset applicability.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source.

Pollutant	tons/year
PM	0.017
PM ₁₀	0.066
SO ₂	0.005
VOC	26.4
CO	0.730
NO _x	0.869

HAPs	tons/year
1,1,1 - Trichloroethylene	10.5
Methylene chloride	22.2
Total	45.2

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is equal to or greater than twenty-five (25) tons per year. However, the source has agreed to limit their single HAP emissions and total HAP emissions below Title V limits. Therefore, the source will be issued a FESOP.
- (b) **Fugitive Emissions**
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-7, fugitive emissions are not counted toward the determination of Part 70 applicability.

Actual Emissions

No previous emission data has been received from the source.

Potential to Emit After Issuance

The source has opted to remain a FESOP source. The table below summarizes the potential to emit, reflecting all limits of the emission units. Any control equipment is considered enforceable only after issuance of this FESOP and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/Emission Unit	Potential to Emit (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Twenty-five (25) Storage Tanks	-	-	-	8.38	-	-	4.75
Unloading/loading rack (UL-1) and Container Filling (F-1)	-	-	-	7.48	-	-	3.29 Individual 7.78 Total
Piping Fugitives	-	-	-	2.02	-	-	0.948
Natural Gas Combustion	0.017	0.066	0.005	0.048	0.730	0.869	0.016
Other Insignificant Activities	1.00	1.00	-	10.0	-	-	1.00 individual 2.50 total
Total	1.02	1.07	0.005	26.4	0.730	0.869	less than 4.75 individual less than 15.1 total
Major Source Threshold	250	250	250	250	250	250	10 Individual 25 Total

- (a) This existing stationary source is not major for PSD because the emissions of each criteria pollutant are less than two hundred fifty (<250) tons per year, and it is not one of the twenty-eight (28) listed source categories.
- (b) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, fugitive emissions are not counted toward the determination of PSD applicability.

Federal Rule Applicability

The following federal rules are applicable to the source:

- (a) This source does not require a Part 70, Title V Operating Permit. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not included in the permit.
- (b) The requirements of the New Source Performance Standards, 40 CFR 60.40, 60.40a, 60.40b and 60.40c Subparts D, Da, Db and Dc are not included in the permit for the insignificant boiler and water heaters because the capacity of each unit is less than 10 million British thermal units per hour.
- (c) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978, 40 CFR 60.110, Subpart K, are not included in the permit for this source because each storage tank has a capacity less than 40,000 gallons.
- (d) The requirements of the New Source Performance Standard for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984, 40 CFR 60.110a, Subpart Ka, are not included in the permit for this source because each storage tank has a capacity less than 40,000 gallons.
- (e) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction,

Reconstruction, or Modification Commenced After July 23, 1984, 40 CFR 60.110b, Subpart Kb, are not included in the permit for this source because none of the storage tanks were constructed after July 23, 1984.

- (f) The requirements of the New Source Performance Standard for Standards of Performance for Bulk Gasoline Terminals, 40 CFR 60.500, Subpart XX, are not included in the permit for this source because this source is not a bulk gasoline terminal. This source does not receive gasoline by pipeline, ship or barge.
- (g) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Equipment Leaks (Fugitive Emission Sources) of Benzene, 40 CFR 61.110, Subpart J, are not included in the permit for this source. This source does not have pumps, compressors, pressure relief devices, sampling connections, systems, open-ended valves or lines, valves, flanges and other connectors, product accumulator vessels, and control devices or systems intended to operate in benzene service.
- (h) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Equipment Leaks (Fugitive Emission Sources), 40 CFR 61.240, Subpart V, are not included in the permit for this source because this source is not subject to another subpart in 40 CFR Part 61 which references this subpart.
- (i) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Benzene Emissions from Benzene Storage Vessels, 40 CFR 61.270, Subpart Y, are not included in the permit for this source. This source does not store benzene.
- (j) This source is a RCRA Part B permitted hazardous waste storage source. Therefore, pursuant to 40 CFR 61.340(b), this source is subject to the National Emission Standards for Hazardous Air Pollutants for Benzene Waste Operations, 40 CFR 61, Subpart FF. The total annual benzene quantity from facility waste is less than ten (10) megagrams per year. Therefore pursuant to 40 CFR 61.342(a), the source is exempt from the requirements of 40 CFR 61.342(b) and (c).

The facilities subject to this rule include the following:

- (1) Fourteen (14) organic liquid storage tanks, identified as T-1 - T-6, T-8 - T-13, T-17 and T-24, constructed in 1982, capacity: 10,600 gallons, each.
- (2) One (1) organic liquid storage tank, identified as T-71, constructed in 1982, capacity: 2,200 gallons.
- (3) One (1) organic liquid storage tank, identified as T-74, constructed in 1982, capacity: 2,100 gallons.
- (4) Two (2) organic liquid storage tanks, identified as T-72 and T-73, constructed in 1982, capacity: 2,000 gallons, each.
- (5) One (1) organic liquid storage tank, identified as T-16, constructed in 1982, capacity: 20,500 gallons.
- (6) Three (3) organic liquid storage tanks, identified as T-18, T-19 and T-23, constructed in 1982, capacity: 6,000 gallons, each.
- (7) One (1) organic liquid storage tank, identified as T-22, constructed in 1982, capacity: 8,700 gallons.

- (8) One (1) organic liquid storage tank, identified as T-25, constructed in 1982, capacity: 20,100 gallons.
- (9) One (1) organic liquid blend tank, identified as T-20, constructed in 1982, capacity: 3,500 gallons.
- (10) One (1) bay tank wagon unloading/loading rack for organic liquids, identified as UL-1, constructed in 1982, capacity: 2,250,000 gallons per year.
- (11) One (1) organic liquid container filling area, identified as F-1, constructed in 1982 capacity: 2,250,000 gallons per year.

Non applicable portions of the NESHAP will not be included in the permit. These emission units are subject to the following portions of Subpart FF.

- (1) 40 CFR 61.340(a) and (b)
- (2) 40 CFR 61.341
- (3) 40 CFR 61.342(a)
- (4) 40 CFR 61.355(a)(1), (a)(2), (a)(4), (b)(3) and (c)
- (5) 40 CFR 61.356(a) and (b)(1)
- (6) 40 CFR 61.357(a) and (c)

- (k) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry, 40 CFR 63.100, Subpart F are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (l) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for From the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater, 40 CFR 63.110, Subpart G are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (m) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Organic Hazardous Air Pollutants for Equipment Leaks, 40 CFR 63.160, Subpart H are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (n) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63.420, Subpart R are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (o) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Off-Site Waste and Recovery Operations, 40 CFR 63.680, Subpart DD are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (p) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Tanks—Level 1, 40 CFR 63.900, Subpart OO are not included in the

permit for this source because this source is not a major source of Hazardous Air Pollutants.

- (q) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Containers, 40 CFR 63.920, Subpart PP are not included in the permit for this source because this source is not a major source of Hazardous Air Pollutants..

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential emissions of each criteria attainment pollutant are less than two hundred fifty (250) tons per year. Therefore, this source, which is not one of the twenty-eight (28) listed source categories, is not subject to the requirements of 326 IAC 2-2 (PSD).

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

The one (1) insignificant boiler, which was constructed after July 27, 1997, has a potential to emit less than ten (10) tons per year of any individual HAP and has a potential to emit less than twenty-five (25) tons per year of total combined HAPs. All other facilities at this source were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 2-8 (Federally Enforceable State Operating Permit Program)

The unrestricted potential emissions of total combined HAPs are greater than twenty-five (25) tons per year, and the unrestricted potential emissions of individual HAPs are greater than ten (10) tons per year. Total combined HAPs are limited to less than twenty-five (25) tons per year, and the potential to emit individual HAPs is limited to less than ten (10) tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. The following limits are applicable:

- (a) Pursuant to F 141-14139-00125, issued on May 24, 2002, the total throughput of chemicals at this source shall not exceed 2,000,000 gallons per twelve (12) consecutive month period, excluding methylene chloride and 1,1,1-trichloroethylene. The total throughput of methylene chloride shall not exceed 75,000 gallons per twelve (12) consecutive month period and the total throughput of 1,1,1-trichloroethylene shall not exceed 25,000 gallons per twelve (12) consecutive month period. This will limit the source-wide potential to emit total HAPs to 15.1 tons per year.
- (b) Pursuant to F 141-14139-00125, issued on May 24, 2002, the total throughput of each individual HAP at this source shall not exceed 950,000 gallons per twelve (12) consecutive month period, excluding methylene chloride and 1,1,1-trichloroethylene. The total throughput of methylene chloride shall not exceed 75,000 gallons per twelve (12) consecutive month period and the total throughput of 1,1,1-trichloroethylene shall not exceed 25,000 gallons per twelve (12) consecutive month period. This will limit the potential to emit each individual HAP to less than 4.75 tons per year from the entire source.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-1(c)(6), this source, which is located in St. Joseph County north of Kern Road and east of Pine Road, is subject to the requirements of 326 IAC 5-1-2(2), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations). The opacity shall meet the following, unless otherwise stated in the permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A,

Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Emissions)

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 6-5 (Fugitive Particulate Matter Emission Limitations)

This source, which is located in St. Joseph County north of Kern Road and east of Pine Road, does not have potential fugitive particulate matter emissions of twenty-five (25) tons per year, and received all the necessary preconstruction approvals before December 13, 1985. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability – Individual Facilities

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

Pursuant to 326 IAC 6-2-4(a) particulate emissions from indirect heating constructed after September 21, 1983 shall be limited by the following equation:

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

Where:

Q = total source heat input capacity (MMBtu/hr)

Pt = emission rate limit (lbs/MMBtu)

$$Pt = 1.09/0.245^{0.26} = 1.57 \text{ (lbs/MMBtu)}$$

Based on the calculations, the particulate matter emitted shall not exceed 1.57 pounds per million British thermal units. However, pursuant to 326 IAC 6-2-4(a), for a total source maximum operating capacity rating of less than ten (10) million British thermal units per hour (mmBtu/hr), the particulate matter emitted shall not exceed 0.6 pounds per million British thermal units (lb/mmBtu) heat input. Based upon the emission factors in AP-42, the particulate emissions from the one (1) insignificant boiler is 0.002 lb/MMBtu. Therefore, the boiler can comply with this rule.

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

Each of the facilities at this source has a potential to emit less than five hundred fifty-one thousandths (0.551) pound per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 are not applicable to any of the facilities at this source.

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

The VOC emissions from all of the facilities at this source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable to any of the facilities at this source.

326 IAC 8-4 (Petroleum Sources)

The requirements of 326 IAC 8-4 are not applicable to this source because this source does not have petroleum storage tanks with capacities greater than 39,000 gallons and is not a petroleum refinery, bulk gasoline terminal, bulk gasoline plant, gasoline dispensing facility or gasoline transport.

326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels)

This source is not located in Clark, Floyd, Lake or Porter Counties. Therefore, the requirements of 326 IAC 8-9 are not applicable.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-8 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 2-8-4. 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 in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

There are no compliance monitoring requirements for this source.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

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

An application for the purposes of this review was received on August 25, 2006.

Conclusion

The operation of this chemical and solvent storage and distribution source shall be subject to the conditions of the attached FESOP Renewal No. 141-23556-00125.

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

**Company Name: Ashland Distribution Company, A Division of Ashland Inc.
Address City IN Zip: 1817 West Indiana Avenue, South Bend, IN 46613
Permit Number: F 141-23556-00125
Reviewer: Kyle Gregory/MES
Date: December 26, 2007**

Unit	Capacity
Boiler	0.245
Water Heater 1	1.308
Water Heater 2	0.040
Water Heater 3	0.040
Space Heaters	0.175
Space Heaters	0.175
Total Heat Input Capacity (MMBtu/hr)	1.983
Potential Throughput (MMCF/yr)	17

	Pollutant					
	PM*	PM10*	SO2	NOx**	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
Potential Emissions in tons/yr	0.017	0.066	0.005	0.869	0.048	0.730

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

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	0.00210	0.00120	0.07500	1.80000	0.00340
Potential Emissions in tons/yr	0.000018	0.000010	0.000651	0.015634	0.000030

	HAPs - Metals					Total HAPs
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.0005	0.0011	0.0014	0.0004	0.0021	0.016
Potential Emissions in tons/yr	0.00000	0.00001	0.00001	0.00000	0.00002	

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

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

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

**Appendix A: Emissions Calculations
Storage Tanks
VOC and HAP Emissions**

**Company Name: Ashland Distribution Company, A Division of Ashland Inc.
Address City IN Zip: 1817 West Indiana Avenue, South Bend, IN 46613
Permit Number: F 141-23556-00125
Reviewer: Kyle Gregory/MES
Date: December 26, 2007**

Tank#	capacity (gallons)	capacity (barrels)	Potential to Emit VOC (lbs/year)	Potential to Emit VOC (tons/year)	Potential to Emit HAPs (lbs/year)	Potential to Emit HAPs (tons/year)	Type
T-1	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-2	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-3	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-4	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-5	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-6	10600	252	831	0.415	374	0.187	Vertical Fixed Roof
T-8	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-9	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-10	10600	252	831	0.415	443	0.221	Vertical Fixed Roof
T-11	10600	252	831	0.415	443	0.221	Vertical Fixed Roof
T-12	10600	252	770	0.385	374	0.187	Vertical Fixed Roof
T-13	10600	252	831	0.415	443	0.221	Vertical Fixed Roof
T-16	20500	488	1440	0.720	692	0.346	Vertical Fixed Roof
T-17	10600	252	831	0.415	443	0.221	Vertical Fixed Roof
T-18	6000	143	440	0.220	214	0.107	Vertical Fixed Roof
T-19	6000	143	440	0.220	214	0.107	Vertical Fixed Roof
T-20	3500	83	129	0.064	129	0.064	Vertical Fixed Roof
T-22	8700	207	639	0.320	1442	0.721	Vertical Fixed Roof
T-23	6000	143	440	0.220	214	0.107	Vertical Fixed Roof
T-24	10600	252	831	0.415	443	0.221	Vertical Fixed Roof
T-25	20100	479	1415	0.708	681	0.340	Vertical Fixed Roof
T-71	2200	52	178	0.089	89.0	0.044	Horizontal Fixed Roof
T-72	2000	48	159	0.080	78.7	0.039	Horizontal Fixed Roof
T-73	2000	48	159	0.080	78.7	0.039	Horizontal Fixed Roof
T-74	2100	50	172	0.086	86.3	0.043	Horizontal Fixed Roof
Total:	227500	5417	16762	8.38	9496	4.75	

Methodology

Calculated by applicant using Tanks 2.0 and the worst case VOC chemical and worst case HAP stored plus methylene chloride stored in T-22.

**Appendix A: Emissions Calculations
VOC and HAP Emissions
Unloading/Loading & Filling Areas**

Company Name: Ashland Distribution Company, A Division of Ashland Inc.
Address City IN Zip: 1817 West Indiana Avenue, South Bend, IN 46613
Permit Number: F 141-23556-00125
Reviewer: Kyle Gregory/MES
Date: December 26, 2007

Uncontrolled Potential to Emit

VOC

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit VOC (lbs/yr)	Potential to Emit VOC (tons/yr)
Bay tank wagon loading/unloading rack	0.6	3.585	58.08	68	2.95	2250000	6633.36	3.32
Container Filling Area	1.45	3.585	58.08	68	7.12	2250000	16030.62	8.02
Worst Case:							16031	8.02

HAPs, excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2250000	6442.98	3.22
Container Filling Area	1.45	2.347	86.17	68	6.92	2250000	15570.55	7.79
Worst Case:							15571	7.79

HAPs, maximum individual excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2250000	6442.98	3.22
Container Filling Area	1.45	2.347	86.17	68	6.92	2250000	15570.55	7.79
Worst Case:							15571	7.79

Methylene chloride

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	6.784	84.94	68	8.16	2250000	18357.60	9.179
Container Filling Area	1.45	6.784	84.94	68	19.72	2250000	44364.21	22.182
Worst Case:							44364	22.2

1,1,1 - Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Container Filling Area	1.45	2.044	133.42	68	9.33	2250000	20996.00	10.498
Worst Case:							20996	10.5

Limited Potential to Emit

HAPs, excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	2000000	5727.10	2.86
Container Filling Area	1.45	2.347	86.17	68	6.92	2000000	13840.48	6.92
Limited:							13840	6.92

HAPs, maximum individual excluding Methylene chloride and Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	2.347	86.17	68	2.86	950000	2720.37	1.36
Container Filling Area	1.45	2.347	86.17	68	6.92	950000	6574.23	3.29
Limited:							6574	3.29

Methylene chloride

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Bay tank wagon loading/unloading rack	0.6	6.784	84.94	68	8.16	75000	611.92	0.306
Container Filling Area	1.45	6.784	84.94	68	19.72	75000	1478.81	0.739
Limited:							1479	0.739

1,1,1 - Trichloroethylene

	Saturation Factor (S)	True Vapor Pressure (P) (psia)	Molecular Weight (M) (lb/lb mol)	Temperature (T) (deg. F)	Loading Loss (Lt) (lbs/1000 gallons)	Throughput (gallons)	Potential to Emit HAPs (lbs/yr)	Potential to Emit HAPs (tons/yr)
Container Filling Area	1.45	2.044	133.42	68	9.33	25000	233.29	0.117
Limited:							233	0.117

Methodology

Maximum PTE when operating at throughput limits using worst case chemicals and worst case loading/unloading method.
Variables provided by applicant.
Equations from AP-42, Chapter 5.2.

**Appendix A: Emissions Calculations
VOC and HAP Emissions**

Company Name: Ashland Distribution Company, A Division of Ashland Inc.
Address City IN Zip: 1817 West Indiana Avenue, South Bend, IN 46613
Permit Number: F 141-23556-00125
Reviewer: Kyle Gregory/MES
Date: December 26, 2007

Piping Fugitives (F-1)

Tanks

Fugitive Source	Emission Factor (lbs/hr/number)	Quantity	Fugitive VOC Emissions (lbs/hr)	Fugitive VOC Emissions (tons/yr)	Weight Percent HAP Throughput (%)	Fugitive HAP Emissions (tons/yr)
Valves (liquid)	0.0160	25	0.400	1.752	47%	0.823
Flanges (liquid)	0.0005	25	0.013	0.055	47%	0.026

Bay tank wagon loading/unloading rack and container filling

Fugitive Source	Emission Factor (lbs/hr/number)	Quantity	Maximum Hours per year based on capacity and throughput limit	Fugitive VOC Emissions (lbs/hr)	Fugitive VOC Emissions (tons/yr)	Weight Percent HAP Throughput (%)	Fugitive HAP Emissions (tons/yr)
Valves (liquid)	0.0160	14	722	0.224	0.081	47%	0.038
Flanges (liquid)	0.0005	63	722	0.032	0.011	47%	0.005
Pump Seals	0.1090	3	722	0.327	0.118	47%	0.055
Total VOC:				1.00	2.02		0.948

Methodology

Maximum PTE when operating at throughput limits using light liquid emission factors (worst case).
 Variables provided by applicant.
 Equations from AP-42, Chapter 5.2.

Uncontrolled Potential to Emit Summary

Facility	PM	PM10	SO2	NOx	CO	VOC	Individual HAP	Total HAPs
Tanks	-	-	-	-	-	8.38	4.75	4.75
Loading/Unloading (UL-1 and F-1)	-	-	-	-	-	8.02	22.2	40.5
Piping Fugitives	-	-	-	-	-	2.02	0.948	0.948
Natural Gas Combustion	0.017	0.066	0.005	0.869	0.730	0.048	0.016	0.016
Other Insignificant Activities	1.00	1.00	-	-	-	10.0	1.00	2.500
Total	1.02	1.07	0.005	0.869	0.730	26.4	22.2	45.2

Limited Potential to Emit Summary

Facility	PM	PM10	SO2	NOx	CO	VOC	Individual HAP	Total HAPs
Tanks	-	-	-	-	-	8.38	4.75	4.75
Loading/Unloading (UL-1 and F-1)	-	-	-	-	-	8.02	3.29	7.78
Piping Fugitives	-	-	-	-	-	2.02	0.948	0.948
Natural Gas Combustion	0.017	0.066	0.005	0.869	0.730	0.048	0.016	0.016
Other Insignificant Activities	1.00	1.00	-	-	-	10.0	1.00	2.50
Total	1.02	1.07	0.005	0.869	0.730	26.4	4.748	15.04