



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant
DATE: May 25, 2007
RE: Oil Technology, Inc. / 089-24500-00171
FROM: Nisha Sizemore
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) 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-MOD.dot 03/23/06



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May 25, 2007

Mr. Nick Rovai
Oil Technology, Inc.
1203 Sheffield Avenue
Dyer, Indiana 46311

Re: Minor Source Modification No: 089-24500-00171

Dear Mr. Rovai:

Oil Technology, Inc. applied for a source modification on March 21, 2007 for a stationary used oil recycling plant, to be collocated with U.S. Steel Gary Works at One North Broadway, Gary, Indiana 46402. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (a) One (1) stationary recycling plant, approved for construction in 2007, used for processing used oil and lube oil generated by U.S. Steel Gary Works, with a throughput capacity equal to 7,200,000 gallons per year and a batch processing time of approximately 32 hours and consisting of the following:
 - (1) One (1) stabilization tank (identified as ST-1), with a storage capacity of 15,500 gallons;
 - (2) Five (5) processing tanks (identified as PT-2 through PT-6), each with a storage capacity of 15,500 gallons;
 - (3) One (1) final product storage tank (identified as PT-7), with a storage capacity of 15,500 gallons;
 - (4) One (1) loading pump with maximum pumping rate of 100 gallon per minute (gpm);
 - (5) One (1) trailer loading process consisting of a 6,000 gallon tank (identified as FU-2); and
 - (6) One (1) 5,000 gallon tank trailer for transferring lube oils from U.S. Steel Gary Works.
- (b) Paved roads.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-

20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction when the minor source modification has been issued. Operating conditions shall be incorporated into the pending Part 70 operating permit pursuant to 326 IAC 2-7-10.5(l)(3). Operation is not approved until the Part 70 permit has been issued.

Pursuant to Contract No. A305-5-65, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana, 46204-2251, or call (800) 451-6027, and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Original Signed By:

Nisha Sizemore, Chief
Permits Branch
Office of Air Quality

Attachments
ERG/SD

cc: File - Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector – Dave Sampias
Compliance Data Section
Administrative and Development
Technical Support and Modeling - Michele Boner
Billing, Licensing, and Training Section - Dan Stamatkin



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PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

**Oil Technology, Inc.
One North Broadway
Gary, Indiana 46402**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

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

Source Modification: 089-24500-00171	
Original Signed By: Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: May 25, 2007

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the emission units contained in conditions A.1 through A.4 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 approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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

The Permittee owns and operates a stationary used oil and lube oil recycling plant.

Source Address:	One North Broadway, Gary, Indiana 46402
Mailing Address:	1203 Sheffield Avenue, Dyer, Indiana 46311
General Source Phone Number:	(219) 322-2724
SIC Code:	2999
County Location:	Lake
Source Location Status:	Nonattainment for PM2.5 and 8-hour ozone standard Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Emission Offset Rules and Nonattainment NSR; Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Part 70 Source Definition [326 IAC 2-7-1(22)]

This source consists of a primary source operation and the following on-site contractor:

- (a) U.S. Steel Gary Works (plant ID 00121), the primary operation, is located at One North Broadway, Gary, Indiana 46402; and
- (b) Oil Technology, Inc., (plant ID 00171), a supporting operation, is located at One North Broadway, Gary, Indiana 46402.

IDEM has determined that U.S. Steel Gary Works and Oil Technology, Inc. are under the common control of U.S. Steel Gary Works. Therefore, they will be considered as one source, as defined by 326 IAC 2-7-1(22), based on this contractual control. U.S. Steel Gary Works has additional nine (9) on-site contractors, as listed in the Part 70 Permit No.: T089-7663-00121, issued August 18, 2006.

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

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) stationary recycling plant, approved for construction in 2007, used for processing used oil and lube oil generated by U.S. Steel Gary Works, with a throughput capacity equal to 7,200,000 gallons per year and a batch processing time of approximately 32 hours and consisting of the following:
 - (1) One (1) stabilization tank (identified as ST-1), with a storage capacity of 15,500 gallons;
 - (2) Five (5) processing tanks (identified as PT-2 through PT-6), each with a storage capacity of 15,500 gallons;
 - (3) One (1) final product storage tank (identified as PT-7), with a storage capacity of 15,500 gallons;

- (4) One (1) loading pump with maximum pumping rate of 100 gallon per minute (gpm);
- (5) One (1) trailer loading process consisting of a 6,000 gallon tank (identified as FU-2); and
- (6) One (1) 5,000 gallon tank trailer for transferring lube oils from U.S. Steel Gary Works.

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

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

- (b) Paved roads.

A.5 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

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

Terms in this approval 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 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

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

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

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

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.6 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this approval;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and Northwest Regional office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-0178 (ask for Compliance Section)
Facsimile Number: 317-233-6865

Northwest Regional Office

Telephone Number: 219-757-0265
Toll Free: 888-209-8892
Facsimile Number: 219-757-0267

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

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

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

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

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

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

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

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

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

B.8 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314][326 IAC 1-1-6]

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

SECTION C

GENERAL OPERATION CONDITIONS

Entire Source

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

C.1 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 approval:

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

C.2 Fugitive Dust Emissions [326 IAC 6-4]

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

C.3 Fugitive Dust Emissions [326 IAC 6.8-10-3] [326 IAC 6.8-11]

Pursuant to 326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

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

- (j) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
- (k) Any facility or operation not specified in 326 IAC 6-1-11.1(d) shall meet a twenty percent (20%), three (3) minute average opacity standard.

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan, for U.S. Steel Gary Works submitted on March 1, 2003.

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

C.4 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, 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 approval, shall be submitted to:

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

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

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

Compliance Requirements [326 IAC 2-1.1-11]

C.5 Compliance Requirements [326 IAC 2-1.1-11]

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

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

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

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.7 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

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

C.8 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

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

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

C.9 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2][326 IAC 2-3]

- (a) Records of all required monitoring data, reports and support information required by this approval 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 approval, all record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.
- (c) If there is a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-3(II)) at an existing emissions unit or at a source with Plantwide Applicability Limitation(s) (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-3(mm)), the Permittee shall comply with following:
 - (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(II)) at an existing emissions unit, document and maintain the following records:
 - (A) A description of the project.
 - (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
 - (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:

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

C.10 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2][326 IAC 2-3]

- (a) The reports required by conditions in Section D of this approval 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
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval 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) Unless otherwise specified in this approval, all reports required in Section D of this approval shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C- General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ :
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C- General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) and/or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and

- (2) The emissions differ from the preconstruction projection as documented and maintained under Section C- General Record Keeping Requirements (c)(1)(C)(ii).
- (f) The report for project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) and/or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report,

Reports required in this part shall be submitted to:

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

- (g) 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.

SECTION D.1 FACILITY OPERATION CONDITIONS

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

- (a) One (1) stationary recycling plant, approved for construction in 2007, used for processing used oil and lube oil generated by U.S. Steel Gary Works, with a throughput capacity equal to 7,200,000 gallons per year and a batch processing time of approximately 32 hours and consisting of the following:
- (1) One (1) stabilization tank (identified as ST-1), with a storage capacity of 15,500 gallons;
 - (2) Five (5) processing tanks (identified as PT-2 through PT-6), each with a storage capacity of 15,500 gallons;
 - (3) One (1) final product storage tank (identified as PT-7), with a storage capacity of 15,500 gallons;
 - (4) One (1) loading pump with maximum pumping rate of 100 gallon per minute (gpm);
 - (5) One (1) trailer loading process consisting of a 6,000 gallon tank (identified as FU-2); and
 - (6) One (1) 5,000 gallon tank trailer for transferring lube oils from U.S. Steel Gary Works.
- (b) Paved roads.

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

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

D.1.1 Minor Source Modification Limit [326 IAC 2-7-10.5(d)(4)(E)] [326 IAC 2-3]

- (a) The VOC emission rate from the five (5) processing tanks shall not exceed 50 lbs per Mbbl (or 1.19 lbs per Kgal); and
- (b) The amount of used oil and lube oil processed shall not exceed 7,200,000 gallons per twelve (12) consecutive months, with compliance determined at the end of each month.

Compliance with these limits also renders the provisions of 326 IAC 2-3 (Emission Offset) not applicable. Compliance with these limits also satisfies the requirements of 326 IAC 2-7-10.5(d)(4).

D.1.2 Volatile Organic Liquid Storage Vessels [326 IAC 8-9]

Pursuant to 326 IAC 8-9-1, the Permittee shall keep records of the information in 326 IAC 8-9-6(a) and 326 IAC 8-9-6(b) for each storage tank.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days of the startup of used oil recycling plant, in order to demonstrate compliance with Condition D.1.1, the Permittee shall perform VOC testing for the processing tanks, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

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

D.1.4 Record Keeping Requirements

- (a) The Permittee subject to 326 IAC 8-9-1 shall keep all records required under this section for three (3) years unless specified otherwise in Condition D.1.4(b).
- (b) Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to the department a report containing the following information for each storage tank:
 - (1) The vessel identification number;
 - (2) The vessel dimensions; and
 - (3) The vessel capacity.

Records shall be maintained for the life of the tank.

- (c) To document compliance with Condition D.1.1(b), the Permittee shall keep records of the amount of used oil and lube oil processed.
- (d) All records shall be maintained in accordance with Section C – General Record Keeping Requirements, of this permit.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Oil Technology, Inc.
Source Address: One North Broadway, Gary, Indiana 46402
Mailing Address: 1203 Sheffield Avenue, Dryer, Indiana 46311
Part 70 MSM Permit No.: 089-24500-00171

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

Please check what document is being certified:

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

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

Signature:

Printed Name:

Title/Position:

Phone:

Date:

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

**PART 70 SOURCE MODIFICATION
EMERGENCY OCCURRENCE REPORT**

Source Name: Oil Technology, Inc.
Source Address: One North Broadway, Gary, Indiana 46402
Mailing Address: 1203 Sheffield Avenue, Dryer, Indiana 46311
Part 70 MSM Permit No.: 089-24500-00171

This form consists of 2 pages

Page 1 of 2

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

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

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

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

Page 2 of 2

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

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

Part 70 Source Modification Quarterly Report

Source Name: Oil Technology, Inc.
Source Address: One North Broadway, Gary, Indiana 46402
Mailing Address: 1203 Sheffield Avenue, Dryer, Indiana 46311
Part 70 MSM Permit No.: 089-24500-00171
Facility: Processing Tanks (PT-2, PT-3, PT-4, PT-5, and PT-6)
Parameter: VOC
Limit: Total amount of used oil and lube oil processed less than 7,200,000 gal per twelve (12) consecutive month, with compliance determined at the end of each month

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
	Amount Used	Amount Used	Amount Used
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Oil Technology, Inc.
1203 Sheffield Avenue
Dryer, Indiana 46311

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____.
(Company Name)
4. I hereby certify that Oil Technology, Inc. 1203 Sheffield Avenue, Dryer, Indiana, 46311, completed construction of the stationary oil recycling plant on _____ in conformity with the requirements and intent of the source modification application received by the Office of Air Quality on March 21, 2007 and as permitted pursuant to Part 70 Minor Modification No.: 089-24500-00171 issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature _____

Date _____

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of
Indiana on this _____ day of _____, 20 _____ .

My Commission expires:

Signature _____

Name (typed or printed)

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

**Technical Support Document (TSD) for a Part 70
Minor Source Modification**

Source Description and Location

Source Name: Oil Technology, Inc.
Source Location: One North Broadway, Gary, Indiana 46402
County: Lake
SIC Code: 2999
Minor Source Modification No.: 089-24500-00171
Permit Reviewer: ERG/SD

Source Definition

This stationary steel mill consists of a source with an on-site contractor:

- (a) U.S. Steel Gary Works, the primary operation, is located at One North Broadway, Gary, Indiana; and
- (b) Oil Technology, Inc., the supporting operation, will be located at One North Broadway, Gary, Indiana.

IDEM has determined that U.S. Steel Gary Works and Oil Technology, Inc. are under the common control of U.S. Steel Gary Works, and therefore, will be considered one source, as defined by 326 IAC 2-7-1(22), based on this contractual control. Therefore, the term "source" in the Part 70 documents refers to both U.S. Steel and Oil Technology, Inc. as one source.

In lieu of a Significant Permit Modification, a separate Part 70 Operating permit will be issued to Oil Technology, Inc. solely for administrative purposes. U.S. Steel Gary Works was issued a Part 70 Permit No.: T089-7663-00121 on August 18, 2006.

Existing Approvals

The Permittee submitted a Part 70 permit application (No. 089-7074-00171) on December 13, 1996 which was subsequently withdrawn. Oil Technology, Inc. was issued exemption No. 089-10561-00171 on January 27, 1999 for its operation at the Gary location. The Permittee ceased all operations at the Gary location in 2001. There have been no other previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Attainment
PM2.5	Nonattainment
SO ₂	Attainment
NO ₂	Attainment
8-hour Ozone	Moderate Nonattainment
CO	Attainment
Lead	Attainment

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a

rule revision to 326 IAC 1-4-1 redesignating Lake County to attainment for the sulfur dioxide standard, and revoking the one-hour ozone standard in Indiana.

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NOx) 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 and NOx emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's guidance to regulate PM10 emissions as a surrogate for PM2.5 emissions pursuant to the Nonattainment New Source Review requirements.
- (c) Lake County has been classified as attainment or unclassifiable for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) Since this source is classified as a steel mill, it is considered to be in one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (e) Fugitive Emissions
 Since this type of operation is in one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are counted toward the determination of PSD and Emission Offset applicability.

U.S. Steel and Oil Technology, Inc. Source Status
--

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

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM10	Greater than 100
SO ₂	Greater than 100
VOC	Greater than 25
CO	Greater than 100
NO _x	Greater than 100

- (a) This existing source is a major stationary source, under PSD (326 IAC 2-2), because a regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1).
- (b) This existing source is a major stationary source under Emission Offset (326 IAC 2-3) and Nonattainment New Source Review because VOC and PM2.5, both nonattainment regulated pollutants, are emitted at a rate of 100 tons per year or more.

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

HAPs	Potential To Emit (tons/year)
Single HAP (HCl)	>10
Combination of HAPs	>25

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

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by Oil Technology, Inc. on March 21, 2007, relating to the construction of a stationary used oil recycling plant. The following is a list of the proposed emission units:

- (a) One (1) stationary recycling plant, approved for construction in 2007, used for processing used oil and lube oil generated by U.S. Steel Gary Works, with a throughput capacity equal to 7,200,000 gallons per year and a batch processing time of approximately 32 hours and consisting of the following:
- (1) One (1) stabilization tank (identified as ST-1), with a storage capacity of 15,500 gallons;
 - (2) Five (5) processing tanks (identified as PT-2 through PT-6), each with a storage capacity of 15,500 gallons;
 - (3) One (1) final product storage tank (identified as PT-7), with a storage capacity of 15,500 gallons;
 - (4) One (1) loading pump with maximum pumping rate of 100 gallon per minute (gpm);
 - (5) One (1) trailer loading process consisting of a 6,000 gallon tank (identified as FU-2); and
 - (6) One (1) 5,000 gallon tank trailer for transferring lube oils from U.S. Steel Gary Works.

Note: One (1) condenser (CE1) used for reducing steam and one (1) packed tower scrubber (CE2) is used for odor control, are connected in series and exhaust at stack 1. Tanks ST-1, PT-2 through PT-6, and PT-7 vent through the condenser and scrubber to stack 1, although these equipment are not used for emissions control.

- (b) Paved roads.

Note: Process tanks are used for processing used oil which employ a heat, decanting, and settling system in a proprietary method.

Enforcement Issues

There are no pending enforcement actions.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Stack 1	Recycling Plant	15.0	0.83	10,500	170

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

Permit Level Determination – Part 70

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

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

Pollutant	Potential To Emit (tons/year)
PM	20.2
PM10	3.94
SO ₂	0.00
VOC	>25
CO	0.00
NO _x	0.00

HAPs	Potential To Emit (tons/year)
Benzene	0.12
Toluene	0.38
Ethyl Benzene	1.95
Xylene	0.06
Trichloroethane	0.05
Perchloroethane	0.04
TOTAL	2.60

This source modification is subject to 326 IAC 2-7-10.5(d)(4)(E) because the potential to emit of VOC shall be limited to less than twenty-five (25) tons per year by limiting the raw material throughput for the source. Additionally, in lieu of a Significant Permit Modification and solely for administrative purposes, a separate Part 70 Operating Permit will be issued for this facility.

Permit Level Determination – PSD or Emission Offset

The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this Part 70 source modification, and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Emission Unit	Potential to Emit (tons/year)						HAPs
	PM	PM10	SO ₂	VOC	CO	NO _x	
Equipment Leaks	0	0	0	1.61	0	0	3.98
Trailer Loading	0	0	0	4.97	0	0	
Process Tanks (PT-2 through PT-6)	0	0	0	4.29	0	0	
Stabilization Tank	0	0	0	3.06	0	0	
Final Product Tank (PT-7)	0	0	0	2.05	0	0	
Unpaved Roads	20.2	3.94	0	0	0	0	0
Total Emissions From Oil Technology, Inc.	20.2	3.94	0	Less than 16	0	0	Less than 10 and 25 for any single HAP and combination HAPs, respectively
PSD/Emission Offset Thresholds	25	15	40	40	100	40	NA

- (a) This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.
- (b) This modification to an existing major stationary source is not major because the emissions increase is less than the Emission Offset significant levels. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.
- (c) Lake County has been designated as nonattainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A significant emissions increase would be a net emissions increase or the potential of fifteen (15) tons per year or greater of PM10. Oil Technology, Inc. has potential to emit of PM10 from the modification of less than fifteen (15) tons per year. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-1.1-5 does not apply for PM2.5.
- (d) The potential to emit of VOC from this modification is limited to less than twenty-five (25) tons per year by limiting the raw material throughput (see discussion under State Rule applicability section 326 IAC 2-7-10.5 (Minor Source Modification)). Therefore, the potential to emit of VOC is less than forty (40) tons per year and the provisions of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emissions Offset) do not apply.

Federal Rule Applicability Determination

- (a) The provisions of 40 CFR 60.110b – 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 (326 IAC 12) are not included in this modification for the five (5) processing tanks, because although these tanks will be installed in 2007, these tanks have storage capacities less than 75 cubic meters (19,813 gallons), and are not considered as storage tanks under the rule.

- (b) The provisions of 40 CFR 60.110b – 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 (326 IAC 12) are not included in this modification for the one (1) final product storage tank (identified as PT-7) and one (1) stabilization tank (identified as ST-1) because the storage capacities of these tanks are less than 75 cubic meters (19, 813 gallons) each.
- (c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.
- (e) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

The following table is used to identify the applicability of each of the criteria, under 40 CFR 64.1, to each new or modified emission unit involved:

Emission Unit	Control Device Used	Emission Limitation (Y/N)	Uncontrolled PTE of VOC (tons/year)	Controlled PTE of VOC (tons/year)	Major Source Threshold (tons/year)	CAM Applicable (Y/N)	Large Unit (Y/N)
Trailer Loading	N	N	4.97	4.97	100	N	N
Process Tanks		*Y	4.29	4.29		N	N
Stablization Tank		N	3.06	3.06		N	N
Final Product-Storage Tank		N	2.05	2.05		N	N

* The Permittee has a limit on the amount of used oil and lube oil processed to limit potential VOC emissions less than twenty-five (25) tons per year.

The Permittee utilizes one (1) condensor (CE1) to reduce steam and one (1) packed tower scrubber (CE2) for odor control. These units do not provide emissions control from the operation of this used oil and lube oil recycling plant.

Based on this evaluation, the requirements of 40 CFR Part 64, CAM are not applicable to any of the modified units as part of this modification.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

326 IAC 2-2 and 2-3 (PSD and Emission Offset)

PSD and Emission Offset applicability is discussed under the Permit Level Determination - PSD and Emission Offset section.

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

The operation of this stationary used oil recycling plant will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, the provisions of 326 IAC 2-4.1 do not apply.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit under 326 IAC 2-7, Part 70 program, and it is located in Lake county. Pursuant to

this rule, the Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period identified in 326 IAC 2-6. The provisions of 326 IAC 2-6 shall be included in the pending Part 70 Permit No.: 089-24654-00171.

326 IAC 2-7-10.5 (Minor Source Modification)

The Permittee has elected to limit the potential to emit of this modification as follows:

- (1) The VOC emission rate from the five (5) processing tanks shall not exceed 50 lbs per Mbbbl (or 1.19 lbs per Kgal); and
- (2) The amount of used oil and lube oil processed shall not exceed 7,200,000 gallons per twelve (12) consecutive months, with compliance determined at the end of each month.

Compliance with these emission limits will ensure that the potential to emit from this modification is less than twenty-five (25) tons of VOC per year.

326 IAC 5-1 (Opacity Limitations)

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

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

326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements) and
326 IAC 6.8-11 (Particulate Matter Contingency Measures)

The provisions of this rule apply to Oil Technology, Inc. because it has potential to emit of fugitive particulate emissions equal to or greater than five (5) tons per year.

- (a) Pursuant to 326 IAC 6.8-10-3 (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:
 - (1) The average instantaneous opacity of fugitive particulate emissions from a paved road shall not exceed ten percent (10%).
 - (2) The average instantaneous opacity of fugitive particulate emissions from an unpaved road shall not exceed ten percent (10%).
 - (3) The average instantaneous opacity of fugitive particulate emissions from batch transfer shall not exceed ten percent (10%).
 - (4) The opacity of fugitive particulate emissions from continuous transfer of material onto and out of storage piles shall not exceed ten percent (10%) on a three (3) minute average.
 - (5) The opacity of fugitive particulate emissions from storage piles shall not exceed ten percent (10%) on a six (6) minute average.
 - (6) There shall be a zero (0) percent frequency of visible emission observations of a material during the inplant transportation of material by truck or rail at any time.

- (7) The opacity of fugitive particulate emissions from the inplant transportation of material by front end loaders and skip hoists shall not exceed ten percent (10%).
 - (8) There shall be a zero (0) percent frequency of visible emission observations from a building enclosing all or part of the material processing equipment, except from a vent in the building.
 - (9) The PM10 emissions from building vents shall not exceed twenty-two thousandths (0.022) grains per dry standard cubic foot and ten percent (10%) opacity.
 - (10) The opacity of particulate emissions from dust handling equipment shall not exceed ten percent (10%).
 - (11) Any facility or operation not specified in 326 IAC 6.8-10-3 shall meet a twenty percent (20%), three (3) minute average opacity standard.
 - (12) The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan for U.S. Steel Gary Works, submitted on March 1, 2003.
- (b) The source is subject to 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures), because it is subject to the requirements of 326 IAC 6.8-10. Pursuant to this rule, the source shall comply with 326 IAC 6.8-11-4 and 326 IAC 6.8-11-6.

326 IAC 6.8-2 (Lake County: PM10 Emission Requirements)

Oil Technology, Inc., an on-site contractor of U.S. Steel Gary Works, is not specifically listed under this rule or in 326 IAC 6.8-3 through 326 IAC 6.8-8. Therefore, the provisions of this rule do not apply.

326 IAC 6.8-1-2 (Particulate Emission Limitations for Lake County)

Oil Technology, Inc. is subject to the requirements of 326 IAC 6.8-1-2 (Particulate Emission Limitations for Lake County) because the potential emissions from the entire source (including used oil recycling plant) are greater than 100 tons per year.

The facilities listed in this permit shall not discharge to the atmosphere any gases which contain particulate matter in excess of 0.03 grains per dry standard cubic foot.

326 IAC 6-4 (Fugitive Dust 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 is subject to the requirements of 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations) because it is a new source of particulate matter as described in 326 IAC 6-5-1(b). Pursuant to this rule, the Permittee shall control fugitive particulate matter emissions according to the Fugitive Dust Control Plan for U.S. Steel Gary Works, submitted on March 1, 2003.

326 IAC 8-1-6 (BACT)

The potential VOC emissions from each of the processing tanks, storage tanks, and trailer loading process are less than twenty-five (25) tons per year. Therefore, the provisions of 326 IAC 8-1-6 (BACT) do not apply.

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

Although Oil Technology, Inc. will be located in Lake County, this source does not meet the applicability requirements of 326 IAC 8-4-3. The capacity of the storage tank is less than 39,000 gallons and the true vapor pressure of the volatile organic compound is below 1.52psi and it is not

the type of operations listed in the rule. Therefore, the provisions of 326 IAC 8-4 (Petroleum Liquid Storage Facilities) do not apply.

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

- (a) The five (5) stationary processing vessels, each having a storage capacity of 15,000 gallons, are not subject to the provisions of 326 IAC 8-9-1 because these tanks are processing tanks and are not used for VOC storage.
- (b) The stabilization tank (identified as ST-1) and final product storage tank (identified as PT-7) each have a storage capacity less than 39,000 gallons. Therefore, the Permittee is subject to the provisions of 326 IAC 8-9-6(a) and 326 IAC 8-9-6(b), and is exempt from all other provisions of the rule.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also 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 following Compliance Determination Requirements are applicable to this modification:

The processing tanks (identified as PT-2 through PT-6) have applicable compliance determination conditions as specified below:

Emission Unit	Control Device*	Timeframe for Testing	Pollutant	Frequency of Testing	Limit or Requirement
Processing Tanks	N	Within 180 days of start-up	VOC	Once every 5 years	1.19 lbs per Kgal

The Permittee utilizes one (1) condenser (CE1) to reduce steam and one (1) packed tower scrubber (CE2) for odor control. These units do not provide emissions control from the operation of this used oil and lube oil recycling plant. Therefore, the Test Protocol shall indicate that sampling will be performed before the condenser and scrubber or the condenser and scrubber shall be disconnected for testing purposes.

The processing tanks included in this source modification (identified as PT-2 through PT-6) all exhaust at stack 1. The VOC emission rate from the processing tanks is limited to 50 lbs per Mbbf or 1.19 lbs per Kgal. To demonstrate compliance with the limit, all processing tanks must be operated simultaneously during the testing period.

These are no Compliance Monitoring Requirements applicable to this modification.

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 089-24500-00171.

**Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads**

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C)$$

where:

E = emission factor (lb/vehicle mile traveled)	9.7 (g/m ²) (AP-42, Table 13.2.1-3)
sL (non-Winter) = road surface silt loading (g/m ²) =	40.0 tons
w = mean vehicle weight (tons) =	0.082 for PM and 0.016 for PM10
k = empirical constant =	0.65
a = empirical constant =	1.5
b = empirical constant =	0.00047 for PM and PM10
C = emission factor for exhaust, brake and tire wear	120
p = number of days per year with 0.01 inches precipitation	

PM Emission Factor (non-Winter) =	$(0.082 \times (0.6/2)^{0.65} \times (27.5/3)^{1.5} - 0.00047) \times (1 - 120/1460) =$	11.1 lbs/mile
PM10 Emission Factor (non-Winter) =	$(0.016 \times (0.6/2)^{0.65} \times (27.5/3)^{1.5} - 0.00047) \times (1 - 120/1460) =$	2.17 lbs/mile

5. Potential to Emit (PTE) of PM/PM10 from unpaved Roads:

Emission Area	Vehicle Weight (tons)	Unpaved Total VMT	Total Vehicle Emissions (lb/year)	Total Vehicle Emissions (tons/year)
Maintenance Roads (PM)	40.0	3,624	40,376	20.2
Maintenance Roads (PM10)	40.0	3,624	7,877	3.94

Methodology

Total Vehicle Emissions (tons/yr) = Unpaved Total VMT (miles/year) * PM/PM10 Emission Factor * 1 ton/2000 lbs

TOTAL FUGITIVE PM EMISSIONS (tons/year) =	20.2
TOTAL FUGITIVE PM10 EMISSIONS (tons/year) =	3.94

**Appendix A: Emissions Calculations
Fugitive Emissions from Equipment Leaks**

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

Emission Factors from EPA Protocol for Equipment Leak Emission Rates; Table 2-2 - Refinery Average Emission Factors
<http://www.epa.gov/ttnchie1/efdocs/equiplks.pdf>

Material	VOC Concentration Factor	Component Count	Equipment Name	Emission Factor (kg/hour/comp)	PTE of VOC (tons/year)
Heavy Oil	1	6	Pump Seals	0.021	1.22
	1	25	Valves	2.30E-04	0.06
	1	140	Flanges	2.50E-04	0.34
					1.61

METHODOLOGY

PTE of VOC (tons/year) = Component Count * Emission Factor (kg/hour/comp) * VOC Concentrator Factor * 2.2046 lbs/1 kg * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Trailer Loading**

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

Emission Process	Max. Recovery (%)	* Limited Processing Rate for Used-Oil (gal/year)	Max. Oil Recovered (gal/year)	Max. Oil Recovered (Kgal/year)
Trailer Loading	40%	7,200,000	2,880,000	2,880

Material Properties

Molecular weight (lb/lb-mol) = 130
 Temperature of liquid (degree F) = 220
 (degree R) = 680
 Vapor pressure of the liquid (psia) = 1.00

Assumptions

Material properties are assumed to be same as Distillate fuel oil No. 2

* Based on limited processing rate.

Emission Factor

AP-42 emission factors for Transportation and Marketing of Petroleum Liquids, equation (1) in Chapter 5.2, page 5.2-4.

Where: $L_L = (12.46 * S * P * M) * 1/T$

L_L Loading loss (lbs/1000 gal)
 S Saturation Factor (for Splash Filling, S = 1.45)
 P True vapor pressure of the liquid loaded (psia)
 M Molecular weight of the liquid (lb/lb-mol)
 T Temperature (degree R)

Therefore, $L_L = 3.45$ lbs/Kgal

Max. Oil Recovered (Mgal/year) = 2,880
 Limited PTE (tons/year) = **4.97**

Methodology

Max. Oil Recovered (Mgal/year) = Max. Processing Rate for Used-Oil (gal/year) * Worst Case Max. Recovery (%) * 1 Kgal/1000

Limited PTE (tons/year) = Max. Oil Recovered (Kgal/year) * Emission Rate (lbs/Kgal) * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Process Tanks 2, 3, 4, 5, and 6**

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

* Max. Processing Rate for Used-Oil (gal/year)	VOC Emission Rate (lbs/M bbl)	Max. Oil Recovered (M bbl/year)	PTE of VOC (tons/year)
7,200,000	50	171	4.29

Conversion Factor; 1 bbl = 42 gallons

VOC emission factor from AP-42 for Vacuum Distillation Column Condensers, Chapter 5.1, Petroleum Refineries.

Assumptions

Material properties are assumed to be same as Distillate fuel oil No. 2. Since there is no test data for the new facility, the Permittee utilized emission factors from Chapter 5.1, AP-42. The proposed permit consists of testing requirements to demonstrate compliance with the VOC emission rate included above.

* Based on limited processing rate.

Methodology

$PTE \text{ (tons/year)} = \text{Max. Processing Rate for Used-Oil (gal/year)} * \text{VOC Emission Rate (lbs/ M bbl)} * 1 \text{ Kgal/1000 gal} * 1 \text{ bbl/42 gal} * 1 \text{ ton/2000 lbs}$

Appendix A: Emission Calculations
Stabilization Tank and Final Product Tank 7

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

Process Unit	*Total Emissions (lbs/year)	PTE of VOC (tons/year)
Stabilization Tank	6,121	3.06
Final Product Storage Tank 7	4,101	2.05

* Total emissions estimated using the Tanks 4.09d software

Methodology

PTE of VOC (tons/year) = VOC Emissions (lbs/hour) * 8760 hours/year * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Summary**

Company Name: Oil Technology, Inc.
Address: 1 North Broadway, Lake, Indiana 46402
Source Mod.: 089-24500
Plant ID: 089-00171
Reviewer: ERG/SD
Date: May 4, 2007

Limited Potential To Emit in tons per year

Emission Units	PM	PM10	SO₂	VOC	NOx	CO
Equipment Leaks				1.61		
Trailer Loading				4.97		
Process Tanks 2, 3, 4, 5, and 6				4.29		
Stabilization Tank				3.06		
Final Product Storage Tank 7				2.05		
Unpaved Roads	20.2	3.94				
Total	20.2	3.94		16.0		

HAPs	% of VOC	PTE of HAP (tons/year)
Benzene	0.72	0.12
Toluene	2.39	0.38
Ethylbenzene	12.2	1.95
Xylene	0.38	0.06
Trichloroethane	0.33	0.05
Perchloroethane	0.24	0.04

2.60

The HAPs speciation is based on stack test data available for process vessels at a similar source. All emission units are assumed to emit HAPs in the same ratio as the process vessels.