



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: July 21, 2009

RE: United Transportation Group, Inc. / 089-27287-00469

FROM: Matthew Stuckey, 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

**United Transportation Group, Inc.
1150 E. 145th Street
East Chicago, Indiana 46312**

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

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

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 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.

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.

Operation Permit No.: F089-27287-00469	
Issued by:  Alfred C. Dumauval, Ph. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: July 21, 2009 Expiration Date: July 21, 2019

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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 railcar and truck tank cleaning facility.

Source Address:	1150 E. 145th Street, East Chicago, Indiana 46312
Mailing Address:	1150 E. 145th Street, East Chicago, IN 46312
General Source Phone Number:	219-392-8100
SIC Code:	4785
County Location:	Lake
Source Location Status:	Nonattainment for 8-hour ozone standard Nonattainment for PM2.5 standard Attainment for all other criteria pollutants
Source Status:	Federally Enforceable State Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

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

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

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, venting to building B, without controls, which exhausts to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, venting to building A, without controls, which exhausts to vent A.
- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity 1 railcar per two hours, with VOC emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-1.

A.3 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:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2][326 IAC 6.8]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million

(10,000,000) Btu per hour: Five (5) space heaters, and five (5) HVAC units.

- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

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 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, F089-27287-00469, is issued for a fixed term of ten (10) 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] [IC 13-17-12]

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 and Enforcement 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 Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Compliance and Enforcement Branch)

Facsimile Number: 317-233-6865
Northwest Regional Office phone: (219) 757-0265; fax: (219) 757-0267.

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

Indiana Department of Environmental Management
Compliance and Enforcement 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 2-8-4(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 F089-27287-00469 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 and Enforcement Branch, 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
Permit Administration and Support Section, 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
Permit Administration and Support Section, 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 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
Permit Administration and Support Section, 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

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

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

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, 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.22 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
Permit Administration and Support Section, 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.23 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.24 Advanced Source Modification Approval [326 IAC 2-8-4(11)] [326 IAC 2-1.1-9]

- (a) The requirements to obtain a permit modification under 326 IAC 2-8-11.1 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3.
- (b) Pursuant to 326 IAC 2-1.1-9 any permit authorizing construction may be revoked if construction of the emission unit has not commenced within eighteen (18) months from the date of issuance of the permit, or if during the construction, work is suspended for a continuous period of one (1) year or more.

B.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 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 volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period;
 - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period;
 - (3) 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
 - (4) 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) Pursuant to 326 IAC 2-2 (PSD), 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.
- (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.2 Opacity [326 IAC 5-1]

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

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

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

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

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

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

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

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

C.6 Fugitive Dust Emissions [326 IAC 6.8-10-3]

Pursuant to 326 IAC 6.8-10-3 (formerly 326 IAC 6-1-11.1) (Lake County Fugitive Particulate Matter Control Requirements), the particulate matter emissions from source wide activities shall meet the following requirements:

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

The Permittee shall achieve these limits by controlling fugitive particulate matter emissions according to the attached Fugitive Dust Control Plan.

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

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

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 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 0.75 cubic feet on all facility components.

- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Licensed Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Licensed Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

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 and Enforcement Branch, 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 or ninety (90) days of initial start-up, whichever is later. 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 and Enforcement 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.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

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

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)][326 IAC 2-8-5(1)]

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

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

C.13 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.14 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

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

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

C.15 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.16 Emission Statement [326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit an emission statement by July 1 following a calendar year when the source emits oxides of nitrogen or volatile organic compounds into the ambient air equal to or greater than twenty-five (25) tons. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.

The statement must be submitted to:

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

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

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

C.17 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 or ninety (90) days of initial start-up, whichever is later.

C.18 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 and Enforcement Branch, 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.

Stratospheric Ozone Protection

C.19 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 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, venting to building B, without controls, which exhausts to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, venting to building A, without controls, which exhausts to vent A.

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

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

D.1.1 FESOP/Emission Offset Minor Limit [326 IAC 2-8][326 IAC 2-3][326 IAC 8-1-6]

Pursuant to FESOP No. F089-14993-00469, issued on October 21, 2004 and Significant Permit Modification No. 089-25924-00469, issued on April 29, 2008:

- (a) The total number of tank trucks, containing volatile organic compounds (VOC), cleaned at the source shall not exceed 2960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned.
- (b) The source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.1.2 FESOP/Hazardous Air Pollutants [326 IAC 2-8][326 IAC 2-4.1]

Pursuant to FESOP No. F089-14993-00469, issued on October 21, 2004 and Significant Permit Modification No. 089-25924-00469, issued on April 29, 2008:

- (a) The total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any single HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned.
- (b) The source shall not clean any tank trucks or non-pressurized railcars that contain a HAP with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with the above limit, combined with the potential to emit single HAPs and total HAPs from other emission units at the source, shall limit the single HAPs and total HAPs from the entire source to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively.

Compliance with these limits will render the requirements of 326 IAC 2-4.1 (Hazardous Air Pollutants) and 326 IAC 2-7 (Part 70) not applicable.

D.1.3 Particulate Emission Limitations [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the Railcar Cleaning Operation and the Tank Truck Cleaning Operation shall be limited to less than 0.03 grains per dry standard cubic foot (dscf).

D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

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)]

D.1.5 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (4) below. Records maintained for (1) and (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the emission limits established in Conditions D.1.1 and D.1.2. The Permittee shall maintain records of the:

- (1) Calendar dates covered in the compliance determination period;
- (2) Number of railcars and tank trucks, containing VOCs, cleaned at the source;
- (3) Number of railcars and tank trucks, containing HAPs, cleaned at the source;
- (3) Contents of all tank trucks and railcars cleaned; and
- (4) Vapor pressures of the contents (if the contents are volatile organic compounds).

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

D.1.6 Reporting Requirements

A quarterly summary of the information used to document compliance with Conditions D.1.1 and D.1.2, in any compliance period shall be submitted to the address listed in Section C - General Reporting Requirements, 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.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity of 1 railcar per two hours, and emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-1.

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

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

D.2.1 VOC/HAP Emission Limitations [326 IAC 2-3] [326 IAC 2-8] [326 IAC 8-1-6]

Pursuant to FESOP No. F089-14993-00469, issued on October 21, 2004 and Significant Permit Modification No. 089-25924-00469, issued on April 29, 2008:

- (a) VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 4.88 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with the above limit, combined with the potential to emit single HAPs and total HAPs from other emission units at the source, shall limit the single HAPs and total HAPs from the entire source to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70 Permits) not applicable.

D.2.2 Particulate Emission Limitations [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the Pressurized Railcar Purging/Degassing operation shall be limited to less than 0.03 grains per dry standard cubic foot (dscf).

D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

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

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

In order comply with Condition D.2.1:

- (a) A flare, controlling VOC and HAP emissions exhausting to stack S-1, shall be:
- (1) Installed, calibrated, and maintained according to the manufacturers specifications and operated at all times when emissions may be vented to it.

- (2) Designed and operated such that no visible emissions are present as determined by Method 22, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- (b) The following equipment must be installed, calibrated, maintained, and operated in conjunction with the flare:
- (1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame
 - (2) A device that records the gas flow to the flare. The Permittee shall install, calibrate, and maintain a gas flow rate measuring device and record the flow to the control device at all times that the railcar degassing operations are in operation. Flow rate shall be recorded at the beginning and ending of railcar degassing operations and at least every fifteen minutes during railcar degassing operations.

D.2.5 Volatile Organic Compound (VOC) Emissions Calculations

Compliance with the VOC and HAP emissions limitations contained in condition D.2.1 shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP combusted in the flare for the previous month, so as to arrive at VOC/HAP emissions for the most recent twelve (12) consecutive month period.

For the VOC/HAP limits in Condition D.2.1, the VOC/HAP emissions for a month can be arrived at using the following equation:

$$\begin{aligned}\text{VOC/HAP emitted} &= \sum [\text{Gas Flow Rate}_i \times \text{Time}_i] \times \text{VOC/HAP Emission Factor} \\ &= \sum [\text{Gas Flow Rate}_i \times \text{Time}_i] \times 0.985 \text{ lb}/1,000 \text{ ft}^3 \text{ gas}\end{aligned}$$

Where:

Gas Flow Rate $_i$ = The flow rate of gas being vented/purged from the railcar, as recorded by the flow rate measuring device, in cubic feet per minute.

Time $_i$ = The elapsed time that the railcar is vented/purged at a particular flow rate, in minutes.

VOC/HAP Emission Factor = The amount of VOC/HAP emitted, in pounds per one thousand cubic feet of gas vented/purged, as determined during the IDEM approved October 2007 stack test = 0.985 lbs VOC / 1,000 cubic feet of gas burned.

D.2.6 Flare Testing

In order to demonstrate compliance with Condition D.2.1, the Permittee shall perform VOC/HAP testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation at least once every five (5) years, from the date of the most recent valid compliance demonstration utilizing methods as approved by the Commissioner. Testing shall be conducted in accordance with Section C - Performance Testing.

D.2.7 Agreed Order 2006-16020-A

Pursuant to Agreed Order 2006-16020-A, signed November 27, 2007, the Permittee shall not purge HAP containing railcars until such time that testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation is performed in accordance with the requirements of 326 IAC 3-6, that demonstrates compliance with the VOC/HAP emission limits in condition D.2.1.

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

D.2.8 Flare Pilot Flame

The presence of a flare pilot flame shall be monitored continuously using a thermocouple or any other equivalent device to detect the presence of a flame.

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

D.2.9 Record Keeping Requirements

- (a) In order to comply with Condition D.2.1(a), the Permittee shall keep the following records of operation of the Pressurized Railcar Purging/Degassing operation:
- (1) Gas flow rate during all purging/degassing operations;
 - (2) Total elapsed time at each gas flow rate during all purging/degassing operations; and
 - (3) Total VOC/HAP emissions for each railcar purged/degassed.
- (b) To document compliance with Condition D.2.1(b), the Permittee shall maintain records of the:
- (1) Contents of all railcars cleaned; and
 - (2) Vapor pressures of the contents (if the contents are volatile organic compounds).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1(a) 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 an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6-3-2][326 IAC 6.8]

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

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

D.3.1 Particulate Matter [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4, the PM emissions from the 0.38 MMBtu/hr natural gas-fired boiler shall not exceed 0.6 pounds per million BTU heat input.

D.3.2 Fugitive Particulate Matter Emission Limitations [326 IAC 6.8-10]

Pursuant to 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter), compliance with the opacity limits specified in Condition C.6 (Fugitive Dust Emissions) shall be achieved by controlling fugitive particulate matter emissions according to the Fugitive Dust Control Plan (FDCP) submitted on March 11, 2002, included as Attachment A. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. If it is determined that the control procedures specified in the FDCP do not demonstrate compliance with the fugitive emission limitations, IDEM, OAQ may request that the FDCP be revised and submitted for approval.

D.3.3 Particulate Emission Limitations [326 IAC 6.8-1-2]

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the insignificant portable shot blasting unit shall be limited to less than 0.03 grains per dry standard cubic foot (dscf).

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

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

Source Name: United Transportation Group
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
FESOP Permit No.: F089-27287-00469

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 AND ENFORCEMENT 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: United Transportation Group
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
FESOP Permit No.: F089-27287-00469

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">• 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 AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
FESOP Permit No.: F089-27287-00469
Facility: Railcar and Tank Truck Cleaning Operations
Parameter: Number of tank trucks and railcars cleaned that contains any HAP.
Limit: 750 tank trucks per twelve consecutive month period. For every railcar cleaned that contains HAPs, this limit is reduced by 3.43 tank trucks

YEAR: _____

Month	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
 Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
 Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
 FESOP Permit No.: F089-27287-00469
 Facility: Railcar and Tank Truck Cleaning Operations
 Parameter: Number of tank trucks and railcars cleaned that contains any VOC.
 Limit: 2960 tank trucks per twelve consecutive month period. For every railcar cleaned that contains VOC, this limit is reduced by 3.43 tank trucks

YEAR: _____

Month	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned	Number of Tank trucks and Railcars cleaned
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

FESOP Quarterly Report

Source Name: United Transportation Group
Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
FESOP Permit No.: F089-27287-00469
Facility: Pressurized Railcar Purging/Degassing operation
Parameter: VOC / HAP Emissions
Limit: Less than 4.88 tons per twelve month consecutive period

YEAR: _____

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

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

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

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE AND ENFORCEMENT BRANCH
 FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: United Transportation Group
 Source Address: 1150 E. 145th Street, East Chicago, Indiana 46312
 Mailing Address: 1150 E. 145th Street, East Chicago, IN 46312
 FESOP Permit No.: F089-27287-00469

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

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

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

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

APPENDIX A - Fugitive Dust Control Plan

Original Date: 11/02/2000

Revision No.: 1
Date: 3/11/2002
Author: Skip Parker
Re-author: Dan LoGreco
Approved: Mike Pellin

United Transportation Group

Fugitive Dust Control Program

The UTG fugitive dust emission control program has been implemented in keeping with regulations specified by IDEM for fugitive dust emissions (326 IAC 6-4 and 326 IAC 6-5)

UTG will spray the paved and unpaved areas traveled by vehicular traffic with water to limit or eliminate dust emissions from travel. Therefore dust emissions will not travel outside the limits of UTG property.

The following schedule will be adhered to and documented in the table below (or its equivalent) to indicate the days of use and/or non-use as a result of inclement weather.

Any area that may need to be to be water sprayed should be conducted along the following schedule.

Monday – Friday no later then 0900 or anytime deemed necessary. (By noting dust in the air or traveling fugitive dust as a result of vehicular traffic.)

Saturday no later then 0900 or anytime deemed necessary. (By noting dust in the air or traveling fugitive dust as a result of vehicular traffic.)

Week of:	SUN	MON	TUES	WED	THUR	FRI	SAT
Application to Paved Roads	-						
Application to Unpaved Roads	-						

C = Water application completed; N1 = Not necessary (due to inclement weather); N2 = Not necessary (due to zero or minimal dusting); Note that this table should be reproduced as necessary to ensure compliance with 326 IAC 6-4 and 326 IAC 6-5.

This is the beginning of UTG's fugitive dust emission program and it may be necessary to make changes to it in the future to further enhance the efficiency of its use.

**Indiana Department of Environmental Management
Office of Air Quality
and IDEM Northwest Regional Office**

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

Source Background and Description

Source Name:	United Transportation Group
Source Location:	1150 E 145th Street, East Chicago, IN 46312
County:	Lake
SIC Code:	4785
Permit Renewal No.:	F089-27287-00469
Permit Reviewer:	Summer Keown

The Office of Air Quality (OAQ) has reviewed the operating permit renewal application from United Transportation Group, Inc. relating to the operation of a railcar and truck tank cleaning facility.

History

On December 23, 2008, United Transportation Group, Inc. submitted an application to the OAQ requesting to renew its operating permit. United Transportation Group, Inc. was issued FESOP No. F089-14993-00469 on October 21, 2004.

Permitted Emission Units and Pollution Control Equipment

- (a) One (1) Railcar Cleaning Operation, constructed in 1989, venting to building B, without controls, which exhausts to vent B.
- (b) One (1) Tank truck Cleaning Operation, constructed in 1990, venting to building A, without controls, which exhausts to vent A.
- (c) One (1) Pressurized Railcar Purging/Degassing operation, constructed in 1990, with a maximum capacity 1 railcar per two hours, with VOC emissions controlled by a flare with a natural gas-fired pilot, exhausting to stack S-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: One (1) 0.38 MMBtu/hr boiler used to generate steam for cleaning and facility heat. [326 IAC 6-2-4]
- (b) Paved and unpaved roads and parking lots with public access. [326 IAC 6-5]
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to three one-hundredths (0.03) grains per actual cubic foot and a gas flow rate less than or equal to four thousand (4,000) actual cubic feet per minute: One (1) portable shotblasting unit used to remove railcar liners. [326 IAC 6.8]
- (d) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour: Five (5) space heaters, and five (5) HVAC units.

- (e) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

Existing Approvals

Since the issuance of the FESOP (F089-14993-00469) on October 21, 2004, the source has constructed or has been operating under the following approval as well:

Significant Permit Revision No. 089-25924-00469, issued on April 29, 2008

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

Enforcement Issue

There are no enforcement actions pending.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

County Attainment Status

The source is located in Lake County

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Nonattainment Subpart 2 Moderate effective June 15, 2004, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ Nonattainment Severe 17 effective November 15, 1990, for the Chicago-Gary-Lake County area for the 1-hour ozone standard which was revoked effective June 15, 2005. Basic nonattainment designation effective federally April 5, 2005, for PM2.5.	

- (a) Ozone Standards
 - (1) 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.
 - (2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph as attainment for the 8-hour ozone standard.

- (3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Clark, Elkhart, Floyd, LaPorte, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan, Shelby, and St. Joseph as attainment for the 8-hour ozone standard.
- (4) 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.

(i) 1-hour ozone standard

On December 22, 2006 the United States Court of Appeals, District of Columbia issued a decision which served to partially vacate and remand the U.S. EPA's final rule for implementation of the eight-hour National Ambient Air quality Standard for ozone. *South Coast Air Quality Mgmt. Dist. v. EPA*, 472 F.3d 882 (D.C. Cir., December 22, 2006), *rehearing denied* 2007 U.S. App. LEXIS 13748 (D.C. Cir., June 8, 2007). The U.S. EPA has instructed IDEM to issue permits in accordance with its interpretation of the *South Coast* decision as follows: Gary-Lake-Porter County was previously designated as a severe non-attainment area prior to revocation of the one-hour ozone standard, therefore, pursuant to the anti-backsliding provisions of the Clean Air Act, any new or existing source must be subject to the major source applicability cut-offs and offset ratios under the area's previous one-hour standard designation. This means that a source must achieve the Lowest Achievable Emission Rate (LAER) if it exceeds 25 tons per year of VOC emissions and must offset any increase in VOC emissions by a decrease of 1.3 times that amount.

On January 26, 1996 in 40 CFR 52.777(i), the U.S. EPA granted a waiver of the requirements of Section 182(f) of the CAA for Lake and Porter Counties, including the lower NO_x threshold for nonattainment new source review. Therefore, VOC emissions alone are considered when evaluating the rule applicability relating to the 1-hour ozone standards. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.

(ii) 8-hour ozone standard

VOC and NO_x emissions are considered when evaluating the rule applicability relating to the 8-hour ozone standard. Lake County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability – Entire Source section.

(b) PM_{2.5}

U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of 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 New Source Review Rule for PM_{2.5} promulgated on May 8, 2008, and effective on July 15 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.

- (c) **Other Criteria Pollutants**
 Lake County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (d) **Fugitive Emissions**
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Unrestricted Potential Emissions

Appendix A of this TSD reflects the unrestricted potential emissions of the source.

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC is equal to or greater than 100 tons per year. The source is subject to the provisions of 326 IAC 2-7. However, the source has agreed to limit their VOC emissions to less than Title V levels, therefore the source will be issued a FESOP.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all other criteria pollutants are less than 100 tons per year.
- (c) 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/or 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
- (d) 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	PM _{2.5}	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Railcar Cleaning Operation	0.63	0.63	0.63	0.00	< 20.11	0.00	0.00	< 10	< 25
Tank Cleaning Operation	1.8	1.8	1.8	0.00		0.00	0.00		
Railcar Purging/Degassing	0.03	0.03	0.03	0.01	4.88	0.20	1.18		
Natural Gas Combustion	0.01	0.01	0.01	negl.	0.01	0.14	0.17	negl.	negl.
Fugitive Emissions	1.63	1.63	1.63	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	4.1	2.79	2.79	0.01	< 25	0.34	1.35	< 10	< 25

- (a) This existing stationary source is not major for Emission Offset and Nonattainment NSR because the emissions of the nonattainment pollutants, PM_{2.5} and VOC, are less than one hundred (<100) tons per year.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 or 326 IAC 2-3, fugitive emissions are not counted toward the determination of PSD and Emission Offset applicability.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this permit renewal.

State Rule Applicability - Entire Source

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

The conditions of 326 IAC 2-2 apply to major stationary sources. United Transportation Group, Inc. has agreed to limit their emissions to less than major source levels. Therefore, this source is not subject to the conditions of 326 IAC 2-2.

326 IAC 2-3 (Emission Offset)

The conditions of 326 IAC 2-3 apply to new major stationary sources or major modifications constructed in a nonattainment area for which the stationary source or modification is major. United Transportation Group, Inc. has agreed to limit their emissions to less than major source levels. Therefore, this source is not subject to the conditions of 326 IAC 2-3.

326 IAC 2-4.1-1 (Hazardous Air Pollutants)

The source has the potential to emit greater than twenty-five (25) tons per year of any combination of HAPs. However, HAPs will be limited to less than ten (10) tons per year for single HAPs and less than twenty-five (25) tons per year for total HAPs. Therefore, this source is not subject to the conditions of 326 IAC 2-4.1

326 IAC 2-6 (Emission Reporting)

This source is located in Lake County, is not required to have an operating permit under Part 70, has a potential to emit of NO_x less than twenty-five (25) tons per year, has a limited potential to emit of VOC less than twenty-five (25) tons per year, and emits lead into the ambient air at levels less than five (5) tons per year. Therefore, this source is not subject to 326 IAC 2-6 (Emission Reporting).

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 6.8-1-2 (Particulate Matter Limitations for Lake County)

This source is located in Lake County, but is not specifically listed in 326 IAC 6.8-2. Pursuant to 326 IAC 6.8-1-2(a), particulate matter from the railcar cleaning operation, tank truck cleaning operation, pressurized railcar purging/degassing operation, the insignificant portable shotblasting operation, and any other insignificant activity shall not exceed three-hundredths (0.03) grains per dry standard cubic foot (dscf).

326 IAC 6.8-2 through 326 IAC 6.8-8 (Lake County PM10 emission requirements)

Pursuant to 326 IAC 6.8-2-1(a), this source is not subject to 326 IAC 6.8-2 through 326 IAC 6.8-8 because it does not operate any of the specifically listed facilities regulated by this rule.

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

This railcar and tank truck cleaning facility is located in Lake County and it has the potential to emit fugitive particulate matter less than five (5) tons per year. Therefore, this source is not subject to the requirements of 326 IAC 6.8-10 (Lake County: Fugitive Particulate Matter).

326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures)

This railcar and tank truck cleaning facility is located in Lake County, is not listed in 326 IAC 6.8-2, is not a source of fugitive emissions to which 326 IAC 6.8-10-1(a) applies, and has potential PM10 emissions less than 10 tons per year. Therefore, the requirements of 326 IAC 6.8-11 (Lake County Particulate Matter Contingency Measures) do not apply.

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 shall be controlled according to the plan submitted on September 26, 2001. The plan is included as Appendix A to the permit.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on September 26, 2001. The plan indicates that the fugitive emissions will be controlled by spraying the paved and unpaved roads with water on an as-needed basis. The plan is included as Appendix A to the permit.

State Rule Applicability – Railcar and Tank Truck Cleaning Operations

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

Pursuant to FESOP No. F089-14993-00469, issued on October 21, 2004 and Significant Permit Modification No. 089-25924-00469, issued on April 29, 2008:

- (a) The total number of tank trucks, containing volatile organic compounds (VOC), cleaned at the source shall not exceed 2960 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing VOC cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on emissions of 46.5 pounds VOC per railcar and 13.6 pounds VOC per tank truck cleaned.
- (b) The total number of tank trucks, containing any hazardous air pollutant (HAP), cleaned at the source shall not exceed 750 tanks per twelve (12) consecutive month period with compliance determined at the end of each month. For every railcar containing any HAP cleaned at the source, the tank limit shall be reduced by 3.43 tanks. These operational limits are based on maximum emissions of 46.5 pounds HAP per railcar and 13.6 pounds HAP per tank truck cleaned.
- (c) The source shall not clean any tank trucks or non-pressurized railcars that contain a VOC with a vapor pressure greater than 30 mm Hg at 25°C.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with the above limit, combined with the potential to emit single HAPs and total HAPs from other emission units at the source, shall limit the single HAPs and total HAPs from the entire source to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

The Railcar Cleaning and Tank Truck Cleaning Operations are subject to 326 IAC 6.8. Therefore, the conditions of 326 IAC 6-3 are not applicable to these units.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the Railcar Cleaning Operation and the Tank Truck Cleaning Operation shall be limited to less than 0.03 grains per dry standard cubic foot (dscf).

State Rule Applicability – Pressurized Railcar Purging/Degassing Operation

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

The operation of the Pressurized Purging/Degassing Operation will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

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

Pursuant to FESOP No. F089-14993-00469, issued on October 21, 2004 and Significant Permit Modification No. 089-25924-00469, issued on April 29, 2008:

- (a) VOC/HAP emissions from the Pressurized Railcar Purging/Degassing operation shall not exceed 4.88 tons per twelve consecutive month period, with compliance determined at the end of each month.
- (b) The source shall not clean any pressurized railcars that contain a VOC/HAP with a vapor pressure greater than 95 mm Hg at 25°C.

Compliance with the above limit, combined with the potential to emit VOC from other emission units at the source, shall limit the VOC from the entire source to less than twenty-five (25) tons per twelve (12) consecutive month period.

Compliance with the above limit, combined with the potential to emit single HAPs and total HAPs from other emission units at the source, shall limit the single HAPs and total HAPs from the entire source to less than ten (10) and less than twenty-five (25) tons per twelve (12) consecutive month period, respectively.

Compliance with these limits will render the requirements of 326 IAC 2-3 (Emission Offset) and 326 IAC 8-1-6 (BACT), and 326 IAC 2-7 (Part 70 Permits) not applicable.

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

The Pressurized Railcar Purging/Degassing Operation is subject to 326 IAC 6.8. Therefore, the conditions of 326 IAC 6-3 are not applicable to the Pressurized Railcar Purging/Degassing Operation.

326 IAC 6.8 (Particulate Matter Limitations for Lake County)

Pursuant to 326 IAC 6.8-1-2, the particulate emissions from the Pressurized Railcar Purging/Degassing operation shall be limited to less than 0.03 grains per dry standard cubic foot (dscf).

Agreed Order 2006-16020-A

Pursuant to Agreed Order 2006-16020-A, signed November 27, 2007, the Permittee shall not purge HAP containing railcars until such time that testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation is performed in accordance with the requirements of 326 IAC 3-6, that demonstrates compliance with the VOC/HAP emission limits.

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:

The Pressurized Railcar Purging/Degassing Operation has applicable compliance determination conditions as specified below:

- (a) A flare, controlling both VOC and HAP emissions exhausting to stack S-1, shall be:
 - (1) Installed, calibrated, and maintained according to the manufacturers specifications and operated at all times when emissions may be vented to it.
 - (2) Designed and operated such that no visible emissions are present as determined by Method 22, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.

- (b) The following equipment must be installed, calibrated, maintained, and operated in conjunction with the flare:
 - (1) Heat sensing device, such as an ultraviolet beam sensor or thermocouple, at the pilot light or the flame itself to indicate the continuous presence of a flame
 - (2) A device that records the gas flow to the flare. The Permittee shall install, calibrate, and maintain a gas flow rate measuring device and record the flow to the control device at all times that the railcar degassing operations are in operation. Flow rate shall be recorded at the beginning and ending of railcar degassing operations and at least every fifteen minutes during railcar degassing operations.

- (c) Compliance with the VOC and HAP emissions limitations shall be demonstrated within 30 days of the end of each month. This shall be based on the total VOC/HAP for the most recent twelve (12) consecutive month period.

For the VOC/HAP limits in Condition D.2.1, the VOC/HAP emissions for a month can be arrived at using the following equation:

$$\begin{aligned} \text{VOC/HAP emitted} &= \sum [\text{Gas Flow Rate}_i \times \text{Time}_i] \times \text{VOC/HAP Emission Factor} \\ &= \sum [\text{Gas Flow Rate}_i \times \text{Time}_i] \times 0.985 \text{ lb}/1,000 \text{ ft}^3 \text{ gas} \end{aligned}$$

Where:

Gas Flow Rate $_i$ = The flow rate of gas being vented/purged from the railcar, as recorded by the flow rate measuring device, in cubic feet per minute.

Time $_i$ = The elapsed time that the railcar is vented/purged at a particular flow rate, in minutes.

VOC/HAP Emission Factor = The amount of VOC/HAP emitted, in pounds per one thousand cubic feet of gas vented/purged, as determined during an IDEM-approved October 2007 stack test = 0.985 lbs VOC / 1,000 cubic feet of gas burned.

- (d) The Permittee shall perform VOC/HAP testing on the flare used to control emissions from the Pressurized Railcar Purging/Degassing operation at least once every five (5) years from the date of the most recent valid compliance demonstration utilizing methods as approved by the Commissioner.
- (e) The presence of a flare pilot flame shall be monitored continuously using a thermocouple or any other equivalent device to detect the presence of a flame.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal F089-27287-00469 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 December 23, 2008.

Conclusion

The operation of this railcar and truck tank cleaning facility shall be subject to the conditions of the attached FESOP Renewal No. F089-27287-00469.

**Appendix A: Emissions Calculations
Emissions Summary**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009**

Uncontrolled Potential Emissions

Emissions Unit	PM	PM10	PM2.5	VOC	NOx	CO	SO₂	Single HAP*	Total HAPs
Railcar Cleaning Operation	0.63	0.63	0.63	18.4	--	--	--	> 10	> 25
Tank Cleaning Operation	1.8	1.8	1.8	60.9	--	--	--		
Railcar Purging/Degassing and Flare	0.03	0.03	0.03	244.00	--	--	--		
Natural Gas Combustion	0.01	0.01	0.01	0.01	0.17	0.14	negl.	negl.	negl.
Fugitive Emissions	1.63	0.32	0.32	--	--	--	--	--	--
Total	4.1	2.79	2.79	323.31	0.17	0.14	0.00	> 10	> 25

Controlled Potential Emissions

Emissions Unit	PM	PM10	PM2.5	VOC	NOx	CO	SO₂	Single HAP*	Total HAPs
Railcar Cleaning Operation	0.63	0.63	0.63	< 20.11	--	--	--	< 10	< 25
Tank Cleaning Operation	1.8	1.8	1.8		--	--	--		
Railcar Purging/Degassing and Flare	0.03	0.03	0.03	4.88	1.18	0.20	0.01		
Natural Gas Combustion	0.01	0.01	0.01	0.01	0.17	0.14	negl.	negl.	negl.
Fugitive Emissions	1.63	0.32	0.32	--	--	--	--	--	--
Total	4.1	2.79	2.79	< 25	1.35	0.34	0.01	< 10	< 25

*The specific HAPs that may potentially be emitted will vary depending upon the contents of the railcars. However, production limits will ensure that HAPs are limited to below Title V levels.

**Appendix A: Emissions Calculations
Emissions from Degassing/Purging Operations**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009**

VOC/HAP Emissions

Note: Railcars contain VOCs and or HAPs which are purged and sent to a flare for destruction.

Operating parameters

Capacity:	0.5	cars/hour	
Operating Schedule:	8760	Hours	
Volume of high pressure railcar:	33,500	gal	= 126,817 Liters
Flare efficiency:	98	%	

Estimation of residual VOC in used railcars

Assume: 1) benzene as a surrogate VOC/HAP chemical (MW = 78 lb/lbmol, VP at 25degC = 0.125 atm)
2) Pressure in "empty" railcar = VP of benzene at 25 degC

$$PV = nRT$$

P =	0.125 atm
V =	126,817 liters
R =	0.0821 atm-L/gmol-K
T =	298 K

$$n = PV/RT$$

n =	647.93 gmol/ car residual
n =	111.42 lb/ car residual

$$\begin{aligned} \text{Uncontrolled VOC/HAP Emissions} &= (\text{VOC/HAP residual/car}) \times (\text{operating capacity}) = \\ &= 55.71 \text{ lb/hr} \\ &= 244.00 \text{ ton/yr} \end{aligned}$$

$$\begin{aligned} \text{Controlled VOC/HAP Emissions} &= (\text{Uncontrolled VOC/HAP Emissions}) \times (1 - \text{flare efficiency}/100) \\ &= 1.11 \text{ lb/hr} \\ &= \mathbf{4.88 \text{ ton/yr}} \end{aligned}$$

PM/PM-10, SO2, CO, and NOx Emissions (from VOC combustion)

Criteria pollutant (except VOC) emission calculations are based on the combustion of LPG.

Rate of VOC sent to flare =	55.71 lb/hr
Liquid density of LPG =	4.24 lb/gal
Amount of residual VOC combusted =	54.59 lb/hr

Summary of Emissions

Pollutant	Emission factor - combustion of LPG* (lb/10 ³ gal)	Emissions	
		(lb/hr)	(tpy)
PM	0.6	0.008	0.034
PM10	0.6	0.008	0.034
VOC/HAP	NA	NA	4.88
SO2	0.095	0.001	0.005
NOx	21	0.270	1.184
CO	3.6	0.046	0.203

*Criteria pollutant emissions data source - AP-42, section 1.5 (except VOC)

**Appendix A: Emissions Calculations
Emissions from Tank Truck Cleaning Operations**

Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009

Normal number of tanks washed/year 8976
 Maximum number of tanks containing VOC/HAP washed/year* 8976
 Maximum number of tanks containing PM washed/year** 8976
 *Assumes all tanks contain VOC/HAP when, in actuality, only approximately 7% contain VOC/HAPs
 **Assumes all tanks contain material that is a source of PM

VOC/HAP Emission factor for gaseous heel

VOC/HAP emissions were estimated based upon the chemical properties of toluene and the maximum amount of VOC/HAP in the vapor space of the rail car.

Toluene MW	Vp (mmHg)	tank vol (ft3)	Lb moles/ car	lbs/truck
92	30	936	0.10	8.80
VOC/HAP emission factor (lb/tank)				8.8

VOC/HAP Emission factor for liquid heel

As a worst case estimate, it is assumed that the liquid heel of the tank is not removed and shipped off-site, instead, it is assumed that the liquid is allowed to evaporate.
 Liquid heel assumed to be 0.0091% of product volume (per info from 089-16033-00314)

Therefore,

% loss	tank vol (ft3)	avg liq density (lb/gal)	lbs/truck
0.0091%	936	7.5	4.78
VOC/HAP emission factor (lb/tank)			4.8

Total VOC/HAP emission factor (lb/tank) 13.6

PM Emission factor

PM emissions are estimated based upon trace amounts of powder remaining in tanks (assumed 4 lbs) and 10% of PM is emitted during washing and 90 is captured in washwater.
 Amount of PM remaining in tank 4 pounds
PM emission factor (lb/tank) 0.4

Potential to Emit

	VOC/HAP		PM	
	throughput (tanks)	emissions (tons)	throughput (tanks)	emissions (tons)
Annual Emissions	8976	60.9	8976	1.8

Production Limit for 326 IAC 2-3, 326 IAC 8-1-6 and 326 IAC 2-8 (regarding VOC):

25 ton/yr threshold
 25 ton/yr - 4.88 ton/yr (from degassing/purging operations) = 20.12 ton/yr

$$20.12 \text{ ton/yr} \times \frac{1}{13.6 \text{ lb/tank}} \times 2000 \text{ lb/ton} = 2964$$

rounding down to ensure compliance with 25 ton/yr limit = **2960 truck/yr production limit (base)**

Production Limit for 326 IAC 2-8 (regarding HAP):

10 ton/yr threshold (for a single HAP); but accepted by source to avoid detailed recordkeeping of each HAP

10 ton/yr - 4.88 ton/yr (from degassing/purging operations) = 5.12 ton/yr

$$5.12 \text{ ton/yr} \times \frac{1}{13.6 \text{ lb/tank}} \times 2000 \text{ lb/ton} = 754$$

rounding down to ensure compliance with 10 ton/yr limit = **750 truck/yr production limit (base)**

**Appendix A: Emissions Calculations
Emissions from Railcar Cleaning Operations**

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009**

Normal number of railcars washed/year 792
Maximum number of railcars containing VOC/HAP washed/year* 792
Maximum number of railcars containing PM washed/year** 792

*Assumes all railcars contain VOC/HAP when, in actuality, only approximately 5% contain VOCs
**Assumes all railcars contain material that is a source of PM

VOC/HAP Emission factor for gaseous heel

VOC/HAP emissions were estimated based upon the chemical properties of toluene and the maximum amount of VOC/HAP in the vapor space of the rail car.

Toluene MW	Vp (mmHg)	tank vol (ft3)	Lb moles/ car	lbs/car
92	30	3209	0.33	30.1
VOC/HAP emission factor (lb/car)				30.1

VOC/HAP Emission factor for liquid heel

As a worst case estimate, it is assumed that the liquid heel of the tank is not removed and shipped off-
Liquid heel assumed to be 0.0091% of product volume (per info from 089-16033-00314)

Therefore,

% loss	tank vol (ft3)	avg liq density (lb/gal)	lbs/car
0.0091%	3209	7.5	16.38
VOC/HAP emission factor (lb/tank)			16.4

Total VOC/HAP emission factor (lb/car) 46.5

PM Emission factor

PM emissions are estimated based upon trace amounts of powder remaining in tanks (assumed 16 lbs) and 10% of PM is emitted during washing and 90 is captured in washwater.

Amount of PM remaining in car 16 pounds
PM emission factor (lb/car) 1.6 pounds

Potential To Emit

	VOC/HAP		PM	
	throughput (cars)	emissions (tons)	throughput (cars)	emissions (tons)
Annual Emissions	792	18.4	792	0.63

Production Limit adjustment factor for 326 IAC 2-3:

46.5 lb/railcar = **3.43 tanktrucks per railcar**
13.6 lb/tanktruck (in terms of VOC/HAP emissions)

Therefore, for every railcar containing VOC/HAP cleaned, the tanktruck production limit shall be decreased by that ratio

**Appendix A: Emissions Calculations
Particulate Matter from Fugitive Sources**

Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009

Paved Roads

Maximum Vehicular Speed: 10 mph
 Average Distance of Haul: 0.25 miles
 Weighted Average Gross Weight: 20 tons

Vehicle Type	No. of One Way Trips per Hour	Weight
tanker truck	2	17.5
car	1	2.5
total	3	

Calculations:

$$E = k(sL/2)^{0.65} * (W/3)^{1.5}$$

E = Emission factor (lbs/vehicle miles traveled(VMT))
 k = 0.016 particle size multiplier for PM-10
 0.082 particle size multiplier for PM
 sL = 0.4 road surface silt content (g/m²)
 W = 20 weighted average vehicle weight (tons)

source: AP-42, chapter 13.2.1, p. 13.2.1-6.

VMT= 6570 (miles/yr)

$$E = \frac{PM}{VMT} = 0.4958456 \text{ lbs/VMT}$$

Potential PM Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
 Potential PM Emissions (ton/yr) = **1.63 tpy**

$$E = \frac{PM-10}{VMT} = 0.09675036 \text{ lbs/VMT}$$

Potential PM-10 Emissions (ton/yr) = Emission factor (lbs/VMT) * VMT / 2000 (lbs/ton)
 Potential PM-10 Emissions (ton/yr) = **0.32 tpy**

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

**Company Name: United Transportation Group
Address City IN Zip: 1150 East Chicago, IN 46312
Permit Number: F089-27287-00469
Reviewer: Summer Keown
Date: April 3, 2009**

Total Source
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.38

3.3

Emission Factor in lb/MMCF	PM 7.6	PM10 7.6	SO2 0.6	NOx 100.0 **see below	VOC 5.5	CO 84.0
Potential to Emit (ton/yr)	0.01	0.01	0.00	0.17	0.01	0.14

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

Note that HAP emissions from natural gas combustion are negligible.

VOC emissions from the curing ovens that result from the drying of coatings are accounted for in the surface coating operations.

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

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

Emission Factors from AP 42, Chapter 1.4, Tables 1.4-1, 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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Daniel LoGreco
United Transportation Group, Inc.
1150 E 145th Street
East Chicago, Indiana 46312

DATE: July 21, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
FESOP
089-27287-00469

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Michael Pellin (United Transportation Group, Inc.)
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07



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Toll Free (800) 451-6027
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July 21, 2009

TO: East Chicago Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: United Transportation Group, Inc.
Permit Number: 089-27287-00469

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 11/30/07



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

TO: Interested Parties / Applicant

DATE: July 21, 2009

RE: United Transportation Group, Inc. / 089-27287-00469

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

In order to conserve paper and reduce postage costs, IDEM's Office of Air Quality is now sending many permit decisions on CDs in Adobe PDF format. The enclosed CD contains information regarding the company named above.

This permit is also available on the IDEM website at:
<http://www.in.gov/ai/appfiles/idem-caats/>

If you would like to request a paper copy of the permit document, please contact IDEM's central file room at:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Please Note: *If you feel you have received this information in error, or would like to be removed from the Air Permits mailing list, please contact Patricia Pear with the Air Permits Administration Section at 1-800-451-6027, ext. 3-6875 or via e-mail at PPEAR@IDEM.IN.GOV.*

Enclosures
CD Memo.dot 11/14/08

Mail Code 61-53

IDEM Staff	CDENNY 7/21/2009 United Transportation Group, Inc. 089-27287-00469 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING	
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Daniel LoGreco United Transportation Group, Inc. 1150 E 145th St East Chicago IN 46312 (Source CAATS) VIA CONFIRMED DELIVERY										
2		Michael Pellin Owner/President United Transportation Group, Inc. 1150 E 145th St East Chicago IN 46312 (RO CAATS)										
3		East Chicago Public Library 2401 E Columbus Dr East Chicago IN 46312-2998 (Library)										
4		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
5		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
6		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
7		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)										
8		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)										
9		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)										
10		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)										
11		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)										
12		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)										
13		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
14		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)										
15		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)										

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IDEM Staff	CDENNY 7/21/2009 United Transportation Group, Inc. 089-27287-00469 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)										
2		Ms. Karen Kroczek 8212 Madison Ave Munster IN 46321-1627 (Affected Party)										
3		Calumet Township Trustee 35 E 5th Avenue Gary IN 46402 (Affected Party)										
4		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
5		Kathleen A. Chroback 801 Michigan Avenue LaPorte IN 46350 (Affected Party)										
6		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
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