



Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 17, 2009

RE: Rhodia, Inc. / 089 - 28658 - 00242

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

Notice of Decision: Approval – Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) or IC 13-15-6-1(a) 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.

For an **initial Title V Operating Permit**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **thirty (30)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(b).

For a **Title V Operating Permit renewal**, a petition for administrative review must be submitted to the Office of Environmental Adjudication within **fifteen (15)** days from the receipt of this notice provided under IC 13-15-5-3, pursuant to IC 13-15-6-1(a).

The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of an initial Title V operating permit, permit renewal, or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

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



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We 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

Kia Zuber, Regional Environmental Manager
Rhodia, Inc.
2000 Michigan Street
Hammond, IN 46320

November 17, 2009

Re: 089-28658-00242
First Administrative Amendment to
Part 70 Permit No. 089-21241-00242

Dear Ms. Zuber:

Rhodia, Inc. was issued Part 70 operating permit renewal T089-21241-00242 on December 30, 2008 for a stationary sulfuric acid regeneration facility. On November 10, 2009, the Office of Air Quality (OAQ) received an application from the source requesting that the permit be revised to remove all requirements related to local air pollution control agencies. Local agencies no longer have effective authority to implement state and federal requirements for IDEM. Therefore, IDEM has removed all references to local agencies from the permit. IDEM has determined that this change to the permit will be processed as an administrative amendment pursuant to 326 IAC 2-7-11.

The revised permit specifies that all reports, notices, applications, and any other required submittals shall be submitted to IDEM. The Permittee should note that the local agency could have its own requirements beyond the state and federal requirements contained in the permit. Please contact the local agency for further information.

Pursuant to the provisions of 326 IAC 2-7-11, the permit is hereby administratively amended as follows with the deleted language as strikeouts and new language **bolded**.

1. All references to local agencies have been removed from the permit.
2. The following conditions have been revised to clarify the requirements of the permit.

Change 1:

~~B.4 Enforceability [326 IAC 2-7-7]~~

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

Change 2:

SECTION D.4

EMISSION UNIT OPERATION CONDITIONS

~~Compliance Determination Requirements~~

~~D.4.2 Control of Volatile Organic Compounds (VOCs) [Hammond Ordinance No. 3522 (as amended)]~~

~~The spent acid storage tanks shall be vented to either the Unit 4 furnace or the caustic scrubber vapor combustor at all times the tanks contain spent acid. The Unit 4 furnace or caustic scrubber vapor combustor shall be in operation while the spent acid storage tanks are being vented to them. The Unit 4 furnace or caustic scrubber vapor combustor shall be operating in accordance with Condition D.4.3 at all times while the spent acid storage tanks are vented to them. This condition is not federally or state enforceable.~~

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

~~D.4.3 Parametric Monitoring [Hammond Ordinance No. 3522 (as amended)]~~

- ~~(a) The Permittee shall maintain the effluent liquor of the packed column scrubber at a pH of seven (7) or greater at all times when the spent acid storage tanks are being vented to it. Failure to take reasonable response steps in accordance with Condition C.15 Response to Excursions and Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pH shall be calibrated at least once per calendar month. This condition is not federally or state enforceable.~~
- ~~(b) The Permittee shall maintain the temperature of the vapor combustor at 1125°F or greater at all times, other than switchovers, when the spent acid storage tanks are being vented to it. The temperature of the vapor combustor can be below 1125°F for a switchover period not to exceed eight (8) minutes when the vent gases from the spent acid storage tanks are diverted from the Unit 4 furnace to the vapor combustor. Failure to take reasonable response steps in accordance with Condition C.15 Response to Excursions and Exceedances, shall be considered a deviation from this permit. The instrument used for determining the temperature shall be maintained in accordance with the manufacturer's recommendations. This condition is not federally or state enforceable.~~
- ~~(c) The Permittee shall maintain the average temperature of the Unit 4 furnace at 1500°F or greater at all times when the spent acid storage tanks are being vented to it. Failure to take reasonable response steps in accordance with Condition C.15 Response to Excursions and Exceedances, shall be considered a deviation from this permit. The instrument used for determining the temperature shall be maintained in accordance with the manufacturer's recommendations. This condition is not federally or state enforceable.~~

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

~~D.4.4 Record Keeping Requirements [Hammond Ordinance No. 3522 (as amended)]~~

- ~~(a) The Permittee shall record (on a yearly basis) the total number of hours the spent acid storage tanks, tank trucks and railcars were vented to the caustic scrubber and vapor combustor. This condition is not federally or state enforceable.~~
- ~~(b) To document compliance with Condition D.4.3(a), the Permittee shall record the pH of the effluent liquor from the packed column scrubber on a minutely basis. This condition is not federally or state enforceable.~~
- ~~(c) To document compliance with Condition D.4.3(a), the Permittee shall keep records showing the dates on which the pH instrument was calibrated. This condition is not federally or state enforceable.~~
- ~~(d) To document compliance with Condition D.4.3(b), the Permittee shall record the temperature of the vapor combustor on a minutely basis. This condition is not federally or state enforceable.~~
- ~~(e) To document compliance with Condition D.4.3(c), the Permittee shall record the average temperature of the Unit 4 furnace on a minutely basis. This condition is not federally or state enforceable.~~

Change 5:

Compliance Determination Requirements

~~D.5.2 Control of Volatile Organic Compounds (VOCs) [Hammond Ordinance No. 3522 (as amended)]~~

~~Tanks 70 and 71 shall be vented to either the Unit 4 furnace or the vapor combustor at all times the tanks contain raw materials. The Unit 4 furnace or vapor combustor shall be in operation while tanks 70 and 71 are being vented to them. The Unit 4 furnace or vapor combustor shall be operating in accordance with Condition D.5.3 at all times while tanks 70 and 71 are vented to them. This condition is not federally or state enforceable.~~

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

~~D.5.3 Parametric Monitoring [Hammond Ordinance No. 3522 (as amended)]~~

~~(a) The Permittee shall maintain the temperature of the vapor combustor at 1125°F or greater at all times, other than switchovers, when tanks 70 and 71 are being vented to it. The temperature of the vapor combustor can be below 1125°F for a switchover period not to exceed eight (8) minutes when the vent gases from tanks 70 and 71 are diverted from the Unit 4 furnace to the vapor combustor. Failure to take reasonable response steps in accordance with Condition C.15 – Response to Excursions and Exceedances, shall be considered a deviation from this permit. The instrument used for determining the temperature shall be maintained in accordance with the manufacturer’s recommendations. This condition is not federally or state enforceable.~~

~~(b) The Permittee shall maintain the average temperature of the Unit 4 furnace at 1500°F or greater at all times when tanks 70 and 71 are being vented to it. Failure to take reasonable response steps in accordance with Condition C.15 – Response to Excursions and Exceedances, shall be considered a deviation from this permit. The instrument used for determining the temperature shall be maintained in accordance with the manufacturer’s recommendations. This condition is not federally or state enforceable.~~

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

~~D.5.4 Record Keeping Requirements [Hammond Ordinance No. 3522 (as amended)]~~

- ~~(a) The Permittee shall record (on a yearly basis) the total number of hours tanks 70 and 71 were vented to the vapor combustor. This condition is not federally or state enforceable.~~
- ~~(b) To document compliance with Condition D.5.3(a), the Permittee shall record the temperature of the vapor combustor on a minutely basis. This condition is not federally or state enforceable.~~
- ~~(c) To document compliance with Condition D.5.3(b), the Permittee shall record the average temperature of the Unit 4 furnace on a minutely basis. This condition is not federally or state enforceable.~~

Change 6:

SECTION D.7 EMISSION UNIT OPERATION CONDITIONS – INSIGNIFICANT ACTIVITIES

Molten Sulfur Storage Tank

Emission Unit Description [326 IAC 2-7-5(15)]: One molten sulfur storage tank (tank 21R) with a capacity of 80,000 gallons. The tank exhausts to the atmosphere through a stack identified as D081. Molten sulfur tank truck unloading will be considered part of this emission unit. (The information describing the process contained in this emission unit description box is descriptive information and does not constitute enforceable conditions.)

Compliance Determination Requirements

~~D.7.1 Nuisance Odor Prevention [Hammond Ordinance No. 3522 (as amended)]~~

~~The Permittee shall take all steps necessary, including the cessation of sulfur tank truck unloading, to maintain compliance with the nuisance provision of Hammond Ordinance No. 3522. This condition is not federally or state enforceable.~~

Change 7:

~~D.8.5 Nonhazardous Alternative Fuel Acceptance [Hammond Ordinance No. 3522 (as amended)]~~

~~Nonhazardous alternative fuels with a heat content less than 5,000 BTU/lb cannot be fed to the Unit 4 furnace.~~

Change 8:

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

~~D.8.7.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30] [Consent Decree 2:07CV134 WL]~~

...

The remaining conditions listed under D.7 have been renumbered accordingly.

3. Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". The permit has been revised as follows:

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

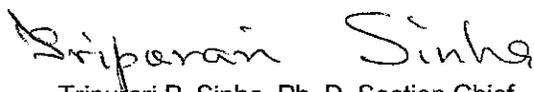
Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit. A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deborah Cole of my staff, at 317-234-5300 or 1-800-451-6027, and ask for extension 4-5300.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Deborah Cole of my staff, at 317-234-5300 or 1-800-451-6027, and ask for extension 4-5300.

Sincerely,


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

Attachments: Updated Permit

TPS/dac

cc: File - Lake County
Lake County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch



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

PART 70 OPERATING PERMIT RENEWAL

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

Rhodia, Inc.
2000 Michigan Street
Hammond, Indiana 46320

(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. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

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

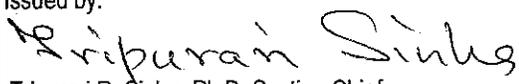
Operation Permit No.: T089-21241-00242	
Issued by/signed by: Tripurari P. Sinha, Ph.D, Section Chief Permits Branch Office of Air Quality	Issuance Date: December 30, 2008
Issued by/signed by: Ronald L. Novak, Director Hammond Department of Environmental Management	Expiration Date: December 30, 2013
First Administrative Amendment: 089-28658-00242	
Issued by:  Tripurari P. Sinha, Ph.D, Section Chief Permits Branch Office of Air Quality	Issuance Date: November 17, 2009 Expiration Date: December 30, 2013

TABLE OF CONTENTS

A	SOURCE SUMMARY	6
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	11
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]	
B.3	Term of Conditions [326 IAC 2-1.1-9.5]	
B.4	Enforceability [326 IAC 2-7-7]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Provide Information [326 IAC 2-7-5(6)(E)]	
B.8	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.9	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.10	Preventive Maintenance Plan [326 IAC 2-7-5(1), (3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]	
B.11	Emergency Provisions [326 IAC 2-7-16]	
B.12	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.13	Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]	
B.14	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]	
B.25	Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]	
C	SOURCE OPERATION CONDITIONS	22
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Opacity [326 IAC 5-1]	
C.2	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.3	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.4	Fugitive Dust Emissions [326 IAC 6-4]	
C.5	Stack Height [326 IAC 1-7]	
C.6	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	
	Testing Requirements [326 IAC 2-7-6(1)]	
C.7	Performance Testing [326 IAC 3-6]	
	Compliance Requirements [326 IAC 2-1.1-11]	
C.8	Compliance Requirements [326 IAC 2-1.1-11]	

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

- C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5-3(A)(iii)]
[Consent Decree 2:07CV134 WL]
- C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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

- C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]
- C.15 Response to Excursions and Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

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

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]
- C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [326 IAC 2-2]
[326 IAC 2-3]
- C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2]
[326 IAC 2-3]

Stratospheric Ozone Protection

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

Consent Decree (Civil Action No. 2:07CV134 WL)

- C.21 Consent Decree Requirements

D.1 EMISSION UNIT OPERATION CONDITIONS - Package Boiler 30

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

- D.1.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30]
- D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-1]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.1.4 PM₁₀ Continuous Compliance [326 IAC 6.8-8]

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

- D.1.5 Record Keeping Requirements

D.2 EMISSION UNIT OPERATION CONDITIONS - Unit 4 Preheater 31

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

- D.2.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30]
- D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-1]
- D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

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

- D.2.4 PM₁₀ Continuous Compliance [326 IAC 6.8-8]

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

- D.2.5 Record Keeping Requirements

D.3	EMISSION UNIT OPERATION CONDITIONS - John Zink Furnace	32
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.3.1	Sulfur Dioxide (SO ₂) [326 IAC 7-4.1-1]	
D.3.2	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.4	EMISSION UNIT OPERATION CONDITIONS - Spent Sulfuric Acid Storage Tanks (#s 46, 47, 56, 57, 58)	33
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.4.1	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.5	EMISSION UNIT OPERATION CONDITIONS - Raw Material Storage Tanks 70 & 71	34
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.5.1	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.6	EMISSION UNIT OPERATION CONDITIONS - Raw Material Storage Tanks 72 – 75	35
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.6.1	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.6.2	Record Keeping Requirements [326 IAC 8-9-6]	
D.7	EMISSION UNIT OPERATION CONDITIONS - Sulfuric Acid Regeneration Unit (Unit 4)	36
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
D.7.1	Particulate Matter Less Than 10 Microns in Diameter (PM ₁₀) [326 IAC 6.8-2-30] [Consent Decree 2:07CV134 WL]	
D.7.2	Sulfur Dioxide (SO ₂) [326 IAC 7-4.1-15] [Consent Decree 2:07CV134 WL]	
D.7.3	Preventive Maintenance Plan [326 IAC 2-7-5(13)]	
D.7.4	HAPs Minor Limit	
	Compliance Determination Requirements	
D.7.5	Testing Requirements [326 IAC 2-7-6(1), (6)] [326 IAC 2-1.1-11]	
D.7.6	Control of Particulate Emissions (PM ₁₀)	
D.7.7	Continuous Emissions Monitoring Requirement [326 IAC 7-4.1-15(b)] [Consent Decree 2:07CV134 WL]	
	Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]	
D.7.8	PM ₁₀ Continuous Compliance [326 IAC 6.8-8]	
D.7.9	Visible Emissions Notations	
	Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]	
D.7.10	Record Keeping Requirements	
D.7.11	Reporting Requirements	
E.1	EMISSION UNIT OPERATION CONDITIONS - Spent Sulfuric Acid Storage Tanks (#s 46, 47, 56, 57, 58)	40
E.1.1	General Provisions Relating to NSPS Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart A]	
E.1.2	Volatile Organic Liquid Storage Vessels NSPS [40 CFR 60, Subpart Kb] [326 IAC 12]	
E.2	EMISSION UNIT OPERATION CONDITIONS - Raw Material Storage Tanks 70 & 71	42
E.2.1	General Provisions Relating to NSPS Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart A]	
E.2.2	Volatile Organic Liquid Storage Vessels NSPS [40 CFR 60, Subpart Kb] [326 IAC 12]	
E.3	EMISSION UNIT OPERATION CONDITIONS - Sulfuric Acid Regeneration Unit (Unit 4)	43
E.3.1	General Provisions Relating to NSPS Subpart H [326 IAC 12-1] [40 CFR 60, Subpart A]	
E.3.2	Sulfuric Acid Plant NSPS [40 CFR 60, Subpart H] [326 IAC 12] [Consent Decree 2:07CV134 WL]	

Certification	45
Emergency Occurrence Report	46
Quarterly Deviation and Compliance Monitoring Report	48
Appendix A: Alternative Monitoring Plan for SO₂ Emissions	
Appendix B: 40 CFR Part 60, Subpart H – Standards of Performance for Sulfuric Acid Plants	
Appendix C: 40 CFR Part 60, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels	

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 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary Sulfuric Acid Regeneration Facility.

Source Address: 2000 Michigan Street, Hammond, Indiana 46320
Mailing Address: Same
General Source Phone Number: (219) 932-7651
SIC Code: 2819 – Industrial Inorganic Chemicals
County Location: Lake County

Source Location Status: Nonattainment for PM_{2.5} standard
Nonattainment for 8-hour ozone standard
Attainment for all other criteria pollutant standards

Source Status: Part 70 Operating Permit Program
Major Source under PSD
Major Source under Emission Offset Rules
Minor Source, Section 112 of the Clean Air Act
1 of 28 Source Categories

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

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

- (a) One (1) natural gas fired boiler, identified as the Package Boiler, rated at ninety-four and three tenths (94.3) MMBtu per hour, exhausting at one (1) stack, identified as D011. The Package Boiler is used to provide supplemental plant steam when Unit 4 is not in operation or is unable to meet the demand.
- (b) One (1) natural gas fired furnace, identified as the Unit 4 Preheater, rated at forty-two (42) MMBtu per hour, exhausting at one (1) stack, identified as D021. The Unit 4 Preheater is used to heat the back half of Unit 4 following a long shutdown.
- (c) One (1) natural gas fired furnace, identified as the John Zink Furnace, rated at fifty-one (51) MMBtu per hour, exhausting through the Unit 4 stack, identified as D031, or through the exit of the quench tower. The John Zink Furnace is used to heat the front half of Unit 4 following a long shutdown.
- (d) Five (5) spent acid storage tanks, identified as tank Nos. 46, 47, 56, 57, and 58. Emissions from these tanks are controlled by the Unit 4 furnace or by the caustic scrubber and vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the caustic scrubber and vapor combustor. The tanks may be vented directly to the atmosphere when they contain only fresh sulfuric acid product. Spent sulfuric acid tank trucks and railcars utilize the same control equipment during unloading activities and will be considered part of this emission unit. Reloading of tank trucks and railcars with fresh acid also results in VOC and sulfur dioxide emissions that are considered part of this emission unit. Emissions from reloading with fresh acid are uncontrolled. Tank specifications are as follows:
 - (1) Tank 46 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1957.

- (2) Tank 47 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1987.
 - (3) Tank 56 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
 - (4) Tank 57 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
 - (5) Tank 58 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
- (e) Two (2) raw material storage tanks, identified as tank Nos. 70 and 71, with capacities of 56,400 gallons each. Raw materials stored consist of nonhazardous alternative fuels and other nonhazardous materials possibly containing volatile organic compounds. Emissions from these tanks are controlled by the Unit 4 furnace or by the vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the vapor combustor. Both tanks were constructed in 1986. Direct burn tank trucks utilize the same control equipment during unloading activities and will be considered part of this emission unit. Direct burn tank trucks are typically depressurized to the Unit 4 furnace. During periods when the Unit 4 furnace is unavailable, direct burn tank trucks may need to be depressurized and emissions routed to the vapor combustor. To ensure the control efficiency of the vapor combustor during these periods, Rhodia will not vent railcars simultaneously. Some atmospheric venting of tank trucks occurs (during open-dome sampling, for example). The company considers these to be insignificant activities.
- (f) Four (4) raw material storage tanks, identified as tank Nos. 72, 73, 74, and 75, with capacities of 8,000 gallons each. Raw materials stored consist of nonhazardous alternative fuels and other nonhazardous materials possibly containing volatile organic compounds. Emissions from these tanks are controlled by the Unit 4 furnace or by the vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the vapor combustor. All four tanks were constructed in 1986. Direct burn tank trucks utilize the same control equipment during unloading activities and will be considered part of this emission unit. Some atmospheric venting of tank trucks occurs (during open-dome sampling, for example). Direct burn tank trucks are typically depressurized to the Unit 4 furnace. During periods when the Unit 4 furnace is unavailable, direct burn tank trucks may need to be depressurized and emissions routed to the vapor combustor. To ensure the control efficiency of the vapor combustor during these periods, Rhodia will not vent railcars simultaneously. The company considers these to be insignificant activities.
- (g) One (1) molten sulfur storage tank, identified as tank 21R, with a capacity of 80,000 gallons. The tank exhausts to the atmosphere through a stack identified as D081. Molten sulfur tank truck unloading will be considered part of this emission unit.
- (h) One (1) sulfuric acid regeneration unit, identified as Unit 4, with a maximum acid production rate of 58.33 tons per hour. Raw materials fed to the unit include spent sulfuric acid, molten sulfur, and other sulfur-bearing materials. The unit includes one (1) furnace firing natural gas and non-hazardous alternative fuels. The furnace is rated at two hundred sixty (260) MMBtu per hour. Acid mist emissions from Unit 4 are controlled by a Brinks mist eliminator before exhausting through one (1) stack, identified as D031. Sulfur dioxide emissions are controlled in the process by a double absorption system.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
- (b) Propane or liquefied petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

- (c) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hr, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hr.
- (d) Combustion source flame safety purging on startup.
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (g) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (h) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (i) Refractory storage not requiring air pollution control equipment.
- (j) Filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (k) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (l) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (m) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (n) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - (2) having a vapor pressure equal to or less than 0.7kPa; 5mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (o) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (p) Closed loop heating and cooling systems.
- (q) Cutting 20,000 linear feet or less of one inch (1") plate or equivalent.
- (r) Using 80 tons or less of welding consumables.
- (s) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
- (t) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs.
- (u) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (v) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (w) Heat exchanger cleaning and repair.
- (x) Process vessel degassing and cleaning to prepare for internal repairs.

- (y) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.
- (z) Paved and unpaved roads and parking lots with public access.
- (aa) Asbestos abatement projects regulated by 326 IAC 14-10.
- (bb) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (cc) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (dd) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (ee) On-site fire and emergency response training approved by the department.
- (ff) Gasoline generators not exceeding 110 horsepower.
- (gg) Diesel generators not exceeding 1600 horsepower.
- (hh) Stationary fire pumps.
- (ii) 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 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (jj) Purge double block and bleed valves.
- (kk) Filter or coalescer media changeout.
- (ll) Vents from ash transport systems not operated at positive pressure.
- (mm) A laboratory as defined in 326 IAC 2-7-1(20)(c).
- (nn) Non-hazardous material drum handling and storage area.
- (oo) Non-hazardous truck activities.
- (pp) Non-hazardous container sampling.
- (qq) Molten sulfur unloading and storage.
- (rr) Ash/brick handling and storage.
- (ss) Commercial sulfuric acid storage, loading, and unloading operations (storage tank, rail car and truck).
- (tt) Catalyst screening with particulate emission control.
- (uu) Portable Brink for acid mist control during maintenance.
- (vv) Painting of facility equipment.
- (ww) Sand blasting.
- (xx) Valves and flanges.

- (yy) Roadway fugitive dust.
- (zz) Acid filter precoat vent.
- (aaa) Wastewater neutralization.
- (bbb) Tank cleaning.
- (ccc) Fresh acid loading.
- (ddd) Emissions associated with washing stack D031

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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

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

SECTION B

GENERAL CONDITIONS

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

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T089-21241-00242, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, 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 2-7-7]

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

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, 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 the "responsible official" as defined by 326 IAC 2-7-1(34). 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 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

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

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the Permittee'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 in letter form 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

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ 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 2-7-5(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 the "responsible official" as defined by 326 IAC 2-7-1(34).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each emission unit:
- (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 PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted emission unit 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 within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM

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

IDEM Northwest Regional Office

Telephone Number: 219-757-0265

Facsimile Number: 219-757-0267

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

Indiana Department of Environmental Management
Compliance 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 2-7-5(3)(C)(ii) and must contain the following:

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

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

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

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) In addition to the nonapplicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) 40 CFR Part 61, Subpart FF, National Emission Standard for Benzene Waste Operations no longer applies to Rhodia's Hammond facility. Rhodia no longer accepts hazardous waste at its Hammond facility, therefore, the facility is no longer considered a hazardous waste treatment, storage and disposal facility (TSDF). According to 40 CFR 61.340, Subpart FF applies to chemical manufacturing plants, coke byproduct recovery plants, petroleum refineries and hazardous waste TSDFs that treat, store or dispose of waste from the aforementioned facilities. Rhodia's Hammond facility no longer meets these applicability requirements.
 - (2) 40 CFR Part 63, Subpart DD, National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations no longer applies to Rhodia's Hammond facility. Since Rhodia is no longer regulated as a hazardous waste TSDF and the facility does not treat off-site wastewater, the facility doesn't meet the Subpart's applicability standard as stated in 40 CFR 63.680. Furthermore, Rhodia's Hammond facility is no longer a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.
 - (3) 40 CFR Part 63, Subpart Q, National Emissions Standard for Hazardous Air Pollutants for Industrial Process Cooling Towers does not apply to Rhodia's Hammond facility on the basis that the source's cooling towers do not operate with chromium-based water treatment chemicals. Furthermore, Rhodia's Hammond facility is no longer a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.
 - (4) 40 CFR Part 63, Subpart EEEE, National Emission Standards for Hazardous Air Pollutants: Organic Liquid Distribution (Non-Gasoline) does not apply to Rhodia's Hammond facility on the basis that the facility was no longer a major source of HAPs, as defined in 40 CFR 63.2, prior to the compliance date of Subpart EEEE (February 5, 2007).
 - (5) 326 IAC Article 19 Mobile Source Rules, and the CAA Title I Sec 182(d)(1)(B), related to employee trip reduction do not apply to the Rhodia's Hammond facility on the basis that fewer than 100 people are employed at the facility.
 - (6) EPA's Commercial and Industrial Solid Waste Incineration rules (40 CFR Part 60, Subparts CCCC and DDDD), IDEM's Incinerator Regulation (326 IAC 4-2), does not apply to Unit 4 at Rhodia's Hammond facility, as Unit 4 is a sulfur recovery unit that treats various sulfur bearing materials by combusting them with natural gas and other fuels.
 - (7) 40 CFR 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units does not apply to Rhodia's Hammond facility on the basis that the Package Boiler was installed prior to the applicability date of June 9, 1989.
 - (8) 40 CFR 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 does not apply to Tanks 72, 73, 74 and 75 because the capacity of each of these storage vessels is less than 75 cubic meters (19,812 gallons).
 - (9) 326 IAC 8-9, Volatile Organic Liquid Storage Vessels does not apply to Tanks 70 and 71, nor to Tanks 46, 47, 56, 57 and 58 because these storage vessels are subject to 40 CFR 60 Subpart Kb.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious

compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T089-21241-00242 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this permit, all previous registrations and permits are superseded by this Part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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

Indiana Department of Environmental Management
Compliance 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ 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 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (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 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(40) and 326 IAC 2-7-1(21). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
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 2-7 until IDEM, OAQ take 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 Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
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

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

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes 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 2-7- 20(b)(1), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be

considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Source Modification Requirement [326 IAC 2-7-10.5] [326 IAC 2-2-2] [326 IAC 2-3-2]

- (a) A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-7-10.5.
- (b) Any modification at an existing major source is governed by the requirements of 326 IAC 2-2-2 or 326 IAC 2-3-2.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
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 the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ 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) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.25 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

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

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

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

C.1 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.2 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.3 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.4 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). The provisions of 326 IAC 6-4 are not federally enforceable.

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-1(3), 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4, and 326 IAC 1-7-5(a), (b), and (d) are not federally enforceable.

C.6 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 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, 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 Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

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

C.7 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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

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

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within thirty (30) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, equipment cannot be installed and operated within thirty (30) days, the Permittee may extend the compliance schedule related to the equipment for an additional thirty (30) 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 thirty (30) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.10 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.11 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)] [Consent Decree 2:07CV134 WL]

- (a) All SO₂ CEMS shall be installed, certified, calibrated, maintained and operated according to the requirements of the Alternative Monitoring Plan (AMP) approved by U.S. EPA and included in Appendix A of this permit.
- (b) In the event of an SO₂ CEMS malfunction of greater than 24 hours, the Permittee shall follow procedures specified in the approved AMP.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)][326 IAC 2-7-6(1)]

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

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

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on March 31, 1997. The Permittee submitted an update to its ERP on February 29, 2000.
- (b) Upon direct notification by IDEM, OAO, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

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.15 Response to Excursions and Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emission unit 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 the "responsible official" as defined by 326 IAC 2-7-1(34).

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

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:
 - (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
 - (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The emission 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 responsible official as defined by 326 IAC 2-7-1(34).

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

- (a) Records of all required monitoring data, reports and support information required by this Permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (c) If there is a reasonable possibility (as defined in 40 CFR 51.165 (a)(6)(vi)(A), 40 CFR 51.165 (a)(6)(vi)(B), 40 CFR 51.166 (r)(6)(vi)(a), and/or 40 CFR 51.166 (r)(6)(vi)(b)) that a "project" (as defined in 326 IAC 2-2-1(qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, other than projects at a source with a Plantwide Applicability Limitation (PAL), which is not part of a "major modification" (as defined in 326 IAC 2-2-1(ee) and/or 326 IAC 2-3-1(z)) may result in a significant emissions increase and the Permittee elects to utilize the "projected actual emissions" (as defined in 326 IAC 2-2-1(rr) and/or 326 IAC 2-3-1(mm)), the Permittee shall comply with the following:
- (1) Before beginning actual construction of the "project" (as defined in 326 IAC 2-2-1 (qq) and/or 326 IAC 2-3-1(ll)) at an existing emissions unit, document and maintain the following records:
- (A) A description of the project.
- (B) Identification of any emissions unit whose emissions of a regulated new source review pollutant could be affected by the project.
- (C) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including:
- (i) Baseline actual emissions;
- (ii) Projected actual emissions;
- (iii) Amount of emissions excluded under section 326 IAC 2-2-1 (rr)(2)(A)(iii) or 326 IAC 2-3-1(mm)(2)(A)(3); and
- (iv) An explanation for why the amount was excluded, and any netting calculations, if applicable.
- (2) Monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any existing emissions unit identified in (1)(B) above; and
- (3) Calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of five (5) years following resumption of regular operations after the change, or for a period of ten (10) years following resumption of regular operations after the change if the project increases the design capacity of or the potential to emit that regulated NSR pollutant at the emissions unit.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11] [326 IAC 2-2] [326 IAC 2-3]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance 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 the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (f) If the Permittee is required to comply with the recordkeeping provisions of (c) in Section C.18 – General Record Keeping Requirements for any "project" (as defined in 326 IAC 2-2-1 (qq) or 326 IAC 2-3-1(II)) at an existing emissions unit, and the project meets the following criteria, then the Permittee shall submit a report to IDEM, OAQ:
- (1) The annual emissions, in tons per year, from the project identified in (c)(1) in Section C - General Record Keeping Requirements exceed the baseline actual emissions, as documented and maintained under Section C - General Record Keeping Requirements (c)(1)(C)(i), by a significant amount, as defined in 326 IAC 2-2-1(xx) or 326 IAC 2-3-1(qq), for that regulated NSR pollutant, and
 - (2) The emissions differ from the preconstruction projection as documented and maintained under Section C.18- General Record Keeping Requirements (c)(1)(C)(ii).
- (g) The report for a project at an existing emissions unit shall be submitted within sixty (60) days after the end of the year and contain the following:
- (1) The name, address, and telephone number of the major stationary source.
 - (2) The annual emissions calculated in accordance with (c)(2) and (3) in Section C- General Record Keeping Requirements.
 - (3) The emissions calculated under the actual-to-projected actual test stated in 326 IAC 2-2-2(d)(3) or 326 IAC 2-3-2(c)(3).
 - (4) Any other information that the Permittee deems fit to include in this report.

Reports required in this part shall be submitted to:

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

- (h) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

Stratospheric Ozone Protection

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

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

Consent Decree (Civil Action No. 2:07CV134 WL)

C.21 Consent Decree Requirements

On July 23, 2007, the United States District Court for the Northern District of Indiana, Hammond Division entered a Consent Decree (Civil Action No. 2:07CV134 WL) to resolve alleged past violation issues at this source and seven other sulfuric acid manufacturing plants located in California, Louisiana, and Texas. Pursuant to Paragraph 17 of the Consent Decree, the Permittee shall incorporate the emission limits in Paragraph 11 of the Consent Decree, and the monitoring requirements in Paragraph 13 of the Consent Decree into this Title V permit, and shall also incorporate applicability of 40 CFR Part 60, Subparts A and H. Pursuant to Paragraph 17.d of the Consent Decree, the SO₂ and sulfuric acid mist emission limitations incorporated pursuant to the Consent Decree shall not be relaxed by any future permit action.

SECTION D.1

EMISSION UNIT OPERATION CONDITIONS

Package Boiler

Emission Unit Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired boiler, rated at ninety-four point three (94.3) MMBtu per hour, exhausting at one (1) stack, identified as D011. The package boiler is used to provide supplemental plant steam when Unit #4 is not in operation or is unable to meet the demand.

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

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

D.1.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30]

Pursuant to 326 IAC 6.8-2-30 (Lake County PM₁₀ emission requirements), PM₁₀ emissions from the package boiler shall not exceed 0.755 pounds per hour or 0.007 pounds per MMBtu.

D.1.2 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-1]

Pursuant to 326 IAC 7-4.1-1 (Lake County sulfur dioxide emission limitations), the package boiler shall burn natural gas only.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

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

D.1.4 PM₁₀ Continuous Compliance [326 IAC 6.8-8]

Pursuant to the source's continuous compliance plan, continuous compliance with the PM₁₀ emission limitation shall be demonstrated by measuring the volume of natural gas fired in the package boiler on an hourly basis and multiplying that volume by the corresponding AP-42 emission factor. The equation used to calculate PM₁₀ emissions is as follows:

To determine PM₁₀ emission rate in lbs/hr:

PM₁₀ emissions = [measured gas volume (ft³/hr)] * [AP-42 FACTOR (1.9 LB/10⁶ FT³)]

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

D.1.5 Record Keeping Requirements

To document compliance with Condition D.1.4, the Permittee shall calculate and record (on an hourly basis) the PM₁₀ emission rate from the package boiler, in units of pounds per hour. The Permittee shall also record the quantity of natural gas fired in the package boiler (on an hourly basis) in units of cubic feet per hour.

SECTION D.2

EMISSION UNIT OPERATION CONDITIONS

Unit 4 Preheater

Emission Unit Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired furnace, rated at forty-two (42) MMBtu per hour, exhausting at one (1) stack, identified as D021. The Unit 4 Preheater is used to heat-up the back half of the sulfuric acid regeneration unit following a prolonged shutdown.

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

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

D.2.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30]

Pursuant to 326 IAC 6.8-2-30 (Lake County PM₁₀ emission requirements), PM₁₀ emissions from the Unit 4 Preheater shall not exceed 0.230 pounds per hour or 0.007 pounds per MMBtu.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-1]

Pursuant to 326 IAC 7-4.1-1 (Lake County sulfur dioxide emission limitations), the Unit 4 Preheater shall burn natural gas only.

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

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

D.2.4 PM₁₀ Continuous Compliance [326 IAC 6.8-8]

Pursuant to the source's continuous compliance plan, continuous compliance with the PM₁₀ emission limitation shall be demonstrated by measuring the volume of natural gas fired in the Unit 4 Preheater on an hourly basis and multiplying that volume by the corresponding AP-42 emission factor. The equation used to calculate PM₁₀ emissions is as follows:

To determine PM10 emission rate in lbs/hr:

$$\text{PM}_{10} \text{ emissions} = [\text{measured gas volume (ft}^3\text{/hr)}] \times [\text{AP-42 FACTOR (1.9 LB/10}^6\text{ FT}^3\text{)}]$$

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

D.2.5 Record Keeping Requirements

To document compliance with Condition D.2.4, the Permittee shall calculate and record (on an hourly basis) the PM₁₀ emission rate from the Unit 4 Preheater, in units of pounds per hour. The Permittee shall also record the quantity of natural gas fired in the Unit 4 Preheater (on an hourly basis), in units of cubic feet per hour.

SECTION D.3

EMISSION UNIT OPERATION CONDITIONS

John Zink Furnace

Emission Unit Description [326 IAC 2-7-5(15)]:

One (1) natural gas fired furnace, identified as the John Zink Furnace, rated at fifty-one (51) MMBtu per hour, exhausting through the Unit 4 stack, identified as D031, or through the exit of the quench tower. The John Zink Furnace is used to heat the front half of Unit 4 following a long shutdown.

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

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

D.3.1 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-1]

Pursuant to 326 IAC 7-4.1-1 (Lake County sulfur dioxide emission limitations), the John Zink Furnace shall burn natural gas only.

D.3.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

SECTION D.4

EMISSION UNIT OPERATION CONDITIONS

Spent Sulfuric Acid Storage Tanks (#s 46, 47, 56, 57, 58)

Emission Unit Description [326 IAC 2-7-5(15)]:

Five (5) spent acid storage tanks, identified as tank Nos. 46, 47, 56, 57, and 58. Emissions from these tanks are controlled by the Unit 4 furnace or by the caustic scrubber and vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the caustic scrubber and vapor combustor. The tanks may be vented directly to the atmosphere when they contain only fresh sulfuric acid product. Spent sulfuric acid tank trucks and railcars utilize the same control equipment during unloading activities and will be considered part of this emission unit. Reloading of tank trucks and railcars with fresh acid also results in VOC and sulfur dioxide emissions that are considered part of this emission unit. Emissions from reloading with fresh acid are uncontrolled. Tank specifications are as follows:

- (1) Tank 46 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1957.
- (2) Tank 47 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1987.
- (3) Tank 56 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
- (4) Tank 57 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
- (5) Tank 58 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.

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

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

D.4.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

SECTION D.5

EMISSION UNIT OPERATION CONDITIONS

Raw Material Storage Tanks 70 & 71

Emission Unit Description [326 IAC 2-7-5(15)]:

Two (2) raw material storage tanks, identified as tank Nos. 70 and 71, with capacities of 56,400 gallons each. Raw materials stored consist of nonhazardous alternative fuels and other nonhazardous materials possibly containing volatile organic compounds. Emissions from these tanks are controlled by the Unit 4 furnace or by the vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the vapor combustor. Both tanks were constructed in 1986. Direct burn tank trucks utilize the same control equipment during unloading activities and will be considered part of this emission unit. Direct burn tank trucks are typically depressurized to the Unit 4 furnace. During periods when the Unit 4 furnace is unavailable, direct burn tank trucks may need to be depressurized and emissions routed to the vapor combustor. To ensure the control efficiency of the vapor combustor during these periods, Rhodia will not vent railcars simultaneously. Some atmospheric venting of tank trucks occurs (during open-dome sampling, for example). The company considers these to be insignificant activities.

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

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

D.5.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

SECTION D.6

EMISSION UNIT OPERATION CONDITIONS

Raw Material Storage Tanks 72 - 75

Emission Unit Description [326 IAC 2-7-5(15)]:

Four (4) raw material storage tanks, identified as tank Nos. 72, 73, 74, and 75, with capacities of 8,000 gallons each. Raw materials stored consist of nonhazardous alternative fuels and other nonhazardous materials possibly containing volatile organic compounds. Emissions from these tanks are controlled by the Unit 4 furnace or by the vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the vapor combustor. All four tanks were constructed in 1986. Direct burn tank trucks utilize the same control equipment during unloading activities and will be considered part of this emission unit. Some atmospheric venting of tank trucks occurs (during open-dome sampling, for example). Direct burn tank trucks are typically depressurized to the Unit 4 furnace. During periods when the Unit 4 furnace is unavailable, direct burn tank trucks may need to be depressurized and emissions routed to the vapor combustor. To ensure the control efficiency of the vapor combustor during these periods, Rhodia will not vent railcars simultaneously. The company considers these to be insignificant activities.

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

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

D.6.1 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit.

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

D.6.2 Record Keeping Requirements [326 IAC 8-9-6]

The Permittee shall maintain records of the following information for each vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

SECTION D.7

EMISSION UNIT OPERATION CONDITIONS

Sulfuric Acid Regeneration Unit (Unit 4)

Emission Unit Description [326 IAC 2-7-5(15)]:

One (1) sulfuric acid regeneration unit, identified as Unit 4, with a maximum acid production rate of 58.33 tons per hour. Raw materials fed to the unit include spent sulfuric acid, molten sulfur, and other sulfur-bearing materials. The unit includes one (1) furnace firing natural gas and non-hazardous alternative fuels. The furnace is rated at two hundred sixty (260) MMBtu per hour. Acid mist emissions from Unit 4 are controlled by a Brinks mist eliminator before exhausting through one (1) stack, identified as D031. Sulfur dioxide emissions are controlled in the process by a double absorption system.

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

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

D.7.1 Particulate Matter Less Than 10 Microns in Diameter (PM₁₀) [326 IAC 6.8-2-30] [Consent Decree 2:07CV134 WL]

Pursuant to 326 IAC 6.8-2-30 (Lake County PM₁₀ emission requirements), acid mist emissions from Unit 4 shall not exceed 6.958 pounds per hour or 0.150 pounds per ton, the production being expressed as 100 percent H₂SO₄.

D.7.2 Sulfur Dioxide (SO₂) [326 IAC 7-4.1-15] [Consent Decree 2:07CV134 WL]

- (a) Pursuant to 326 IAC 7-4.1-15(a) (Lake County sulfur dioxide emission limitations), the SO₂ emissions from Unit 4 shall not exceed seven hundred eighty-two (782) pounds per hour, on a three (3) hour average basis.
- (b) Pursuant to Consent Decree 2:07CV134 WL, the SO₂ emissions from Unit 4 shall not exceed a long-term limit of two and one half (2.5) pounds per ton of 100% sulfuric acid produced and/or a short-term limit of three and one half (3.5) pounds per ton. These emission limits shall not be relaxed by any future permit action. Compliance with the long-term limit shall be achieved no later than July 1, 2008. Compliance with the long-term and short-term limit will be demonstrated using SO₂ analyzers at the converter inlet and stack using the procedures in Appendix A (Alternative Monitoring Plan for SO₂ Emissions).

The following definitions shall apply for this condition:

- (1) "100% sulfuric acid produced" shall mean the stoichiometric quantity of sulfuric acid that would be produced at Unit 4 if all sulfur trioxide (SO₃) exiting the converter were used to produce anhydrous sulfuric acid. For purposes of this definition, scrubber byproduct shall be considered to be included in "100% sulfuric acid produced";
- (2) "Long-term limit" shall mean a sulfur dioxide (SO₂) emission limit expressed as pounds per ton of 100% sulfuric acid produced, averaged over all Operating Hours in a rolling 365-day period;
- (3) "Short-term limit" shall mean the SO₂ emission limit expressed as pounds per ton of 100% sulfuric acid produced, averaged over each rolling 3-hour period. The short-term limit shall not apply during periods of Startup, Shutdown and Malfunction;
- (4) "Operating hours" shall mean periods during which sulfur or sulfur-bearing compounds, excluding conventional fossil fuels such as natural gas or fuel oils, are being fed to the furnace;
- (5) "Startup" shall mean the 24-hour period beginning when the feed of sulfur or sulfur-bearing materials, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnace commences after a main gas blower shutdown;

- (6) "Shutdown" shall mean the cessation of operation of Unit 4 for any reason. Shutdown begins at the time sulfur or sulfur-bearing feeds, excluding conventional fossil fuels such as natural gas or fuel oils, to the furnaces ceases; and
- (7) "Malfunction" shall mean, consistent with 40 CFR 60.2, any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or process to operate in a normal or usual manner, but shall not include failures that are caused in part by poor maintenance or careless operation.

D.7.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Condition B.10 - Preventive Maintenance Plan, of this permit, is required for this emission unit and its control equipment.

D.7.4 HAPs Minor Limit

The mass of chlorides charged to Unit 4 shall not exceed 1,575 tons per consecutive twelve month period with compliance determined at the end of each month. The emissions of hydrochloric acid (HCl) shall not exceed 10.28 lbs per ton of chlorides charged to Unit 4. Compliance with the above condition shall limit single HAP emissions to less than 10 tons per year and will make the source an area source for HAPs.

Compliance Determination Requirements

D.7.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

A compliance stack test shall be performed at the Unit 4 stack to demonstrate compliance with the acid mist emission limit in Condition D.8.1. The compliance stack test shall be performed within 60 days after achieving a production capacity of 1,340 tons of 100% sulfuric acid per day, but not later than October 1, 2011, utilizing methods as approved by the Commissioner. The compliance test shall be repeated every five (5) years of the most recent valid compliance demonstration. Testing shall be conducted in accordance with Condition C.7 – Performance Testing.

D.7.6 Control of Particulate Emissions (PM₁₀)

Unit 4 shall be vented to the final Brink's mist eliminator at all times while the unit is in operation, with the exception of cold startups when feeding only natural gas to the furnace.

D.7.7 Continuous Emissions Monitoring Requirement [326 IAC 7-4.1-15(b)] [Consent Decree 2:07CV134 WL]

Pursuant to 326 IAC 7-4.1-15(b), the Permittee shall operate a continuous analyzer in the stack serving Unit 4. Pursuant to Consent Decree 2:07CV134 WL, the Permittee shall operate a continuous analyzer in the duct between the Unit 4 Dry Tower and Unit 4 Converter. This dual-analyzer CEMS shall be operated and maintained in accordance with the procedures in Appendix A (Alternative Monitoring Plan for SO₂ Emissions).

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

D.7.8 PM₁₀ Continuous Compliance [326 IAC 6.8-8]

Pursuant to the source's continuous compliance plan, continuous compliance with the acid mist emission limitation shall be demonstrated by calculating the sulfuric acid production rate and multiplying that rate by an acid mist emission factor obtained from the most recent performance test. The acid mist emission factor will be obtained by dividing the acid mist emission rate measured during the test by the sulfuric acid production rate. The equation used to calculate acid mist emissions is as follows:

To determine acid mist emission rate in lbs/hr:

$$\text{Acid mist emissions} = [\text{emission factor from stack test (lb/ton)}] * [\text{production rate (tons/hr)}]$$

D.7.9 Visible Emissions Notations

- (a) Visible emission notations of the Unit 4 stack exhaust shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Condition C.15 – Response to Excursions or Exceedances. Failure to take response steps in accordance with Condition C.15 – Response to Excursions or Exceedances shall be considered a deviation from this permit.

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

D.7.10 Record Keeping Requirements

- (a) To document compliance with Condition D.8.9, the Permittee shall calculate and record (on an hourly basis) the acid mist emission rate from Unit 4, in units of pounds per hour.
- (b) To document compliance with Condition D.8.10, the Permittee shall maintain records of daily visible emissions notations for the Unit 4 stack exhaust. The Permittee shall include in its daily record when a visible emissions notation is not taken and the reason for the lack of the visible emissions notation, (e.g., the process did not operate that day).
- (c) To document compliance with Condition D.8.2(a), the quantity of sulfur dioxide emitted from the Unit 4 stack shall be recorded on an hourly basis, in units of pounds per hour.
- (d) The quantity of sulfuric acid produced (on a 100% H₂SO₄ equivalent basis) by Unit 4 shall be recorded once every hour during all Operating Hours, in units of tons per hour.
- (e) The fractional concentration of SO₂ entering the Converter shall be recorded once every five (5) minutes during all operating hours, as defined in the Alternative Monitoring Plan.
- (f) The fractional concentration of SO₂ at the stack shall be recorded once every five (5) minutes during all operating hours, as defined in the Alternative Monitoring Plan.
- (g) The short-term sulfur dioxide emission rate shall be calculated and recorded once every five minutes during all operating hours, except periods of startup, shutdown or malfunction, in accordance with the Alternative Monitoring Plan contained in Appendix A.
- (h) The long-term sulfur dioxide emission rate shall be calculated and recorded on a daily basis in accordance with the Alternative Monitoring Plan contained in Appendix A. The Permittee shall maintain records of the short-term and long-term sulfur dioxide emission rates required to be calculated as described in the Alternative Monitoring Plan contained in Appendix A.
- (i) The Permittee shall record the quantity of natural gas burned in the Unit 4 furnace on an hourly basis, in units of million cubic feet per hour.

- (j) The Permittee shall record the quantity of spent acid fed to the Unit 4 furnace on a minutely basis, in units of pounds or gallons per minute.
- (k) The Permittee shall record the quantity of molten sulfur fed to the Unit 4 furnace on a minutely basis, in units of pounds per minute.
- (l) To document compliance with Condition D.8.4, the Permittee shall maintain records of the quantity of chlorides fed to the Unit 4 furnace on a monthly basis. These records shall be based on annual certification analyses of the materials fed to the Unit 4 furnace. For materials fed from storage tanks, an average value may be used.
- (m) The Permittee shall record the quantity of non-hazardous alternative fuels fed to the Unit 4 furnace on an hourly basis, in units of pounds or gallons per hour.

D.7.11 Reporting Requirements

Pursuant to 326 IAC 7-4.1-15(b), the Permittee shall submit a report to IDEM, OAQ, within 30 days after the end of each calendar quarter. The report shall contain the following information:

- (a) Three (3) hour average sulfur dioxide emission rate in pounds per hour as measured by the CEMS from Unit 4 for each three (3) hour period during the calendar quarter in which the average emissions exceed the allowable rates specified in Condition D.8.2(a).
- (b) The daily average emission rate in units of pounds per ton as determined from CEMS and production data for Unit 4 for each day of the calendar quarter.

SECTION E.1

EMISSION UNIT OPERATION CONDITIONS

Spent Sulfuric Acid Storage Tanks (#s 46, 47, 56, 57, 58)

Emission Unit Description [326 IAC 2-7-5(15)]:

Five (5) spent acid storage tanks, identified as tank Nos. 46, 47, 56, 57, and 58. Emissions from these tanks are controlled by the Unit 4 furnace or by the caustic scrubber and vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the caustic scrubber and vapor combustor. The tanks may be vented directly to the atmosphere when they contain only fresh sulfuric acid product. Spent sulfuric acid tank trucks and railcars utilize the same control equipment during unloading activities and will be considered part of this emission unit. Reloading of tank trucks and railcars with fresh acid also results in VOC and sulfur dioxide emissions that are considered part of this emission unit. Emissions from reloading with fresh acid are uncontrolled. Tank specifications are as follows:

- (1) Tank 46 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1957.
- (2) Tank 47 is a fixed cone roof tank with a maximum capacity of 102,500 gallons. The tank was constructed in 1987.
- (3) Tank 56 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
- (4) Tank 57 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.
- (5) Tank 58 is a fixed cone roof tank with a maximum capacity of 815,000 gallons. The tank was constructed in 1978.

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

E.1.1 General Provisions Relating to NSPS Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart A]

Pursuant to 40 CFR Part 60, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the affected emission units at this source, except when otherwise specified in 40 CFR Part 60, Subpart Kb.

E.1.2 Volatile Organic Liquid Storage Vessels NSPS [40 CFR 60, Subpart Kb] [326 IAC 12]

The Permittee, which operates the volatile organic liquid storage vessels designated as tank Nos. 46, 47, 56, 57, and 58, shall comply with the following provisions of 40 CFR Part 60, Subpart Kb (included as Appendix C of this permit), which are incorporated by reference as 326 IAC 12:

40 CFR 60.110b Applicability and designation of affected facility.

40 CFR 60.110b(a)

40 CFR 60.111b Definitions.

40 CFR 60.111b

40 CFR 60.112b Standard for volatile organic compounds (VOC).

40 CFR 60.112b(a)(3)

40 CFR 60.113b Testing and procedures.

40 CFR 60.113b(c)

40 CFR 60.115b Reporting and recordkeeping requirements.

40 CFR 60.115b(c)

40 CFR 60.116b **Monitoring of operations.**

40 CFR 60.116b(a)

40 CFR 60.116b(b)

40 CFR 60.116b(e)

40 CFR 60.116b(f)

40 CFR 60.116b(g)

SECTION E.2

EMISSION UNIT OPERATION CONDITIONS

Raw Material Storage Tanks 70 & 71

Emission Unit Description [326 IAC 2-7-5(15)]:

Two (2) raw material storage tanks, identified as tank Nos. 70 and 71, with capacities of 56,400 gallons each. Raw materials stored consist of nonhazardous alternative fuels and other nonhazardous materials possibly containing volatile organic compounds. Emissions from these tanks are controlled by the Unit 4 furnace or by the vapor combustor, should the furnace be unavailable. Exhaust to the atmosphere is through stack D031 when venting to the furnace and through stack D041 when venting to the vapor combustor. Both tanks were constructed in 1986. Direct burn tank trucks utilize the same control equipment during unloading activities and will be considered part of this emission unit. Direct burn tank trucks are typically depressurized to the Unit 4 furnace. During periods when the Unit 4 furnace is unavailable, direct burn tank trucks may need to be depressurized and emissions routed to the vapor combustor. To ensure the control efficiency of the vapor combustor during these periods, Rhodia will not vent railcars simultaneously. Some atmospheric venting of tank trucks occurs (during open-dome sampling, for example). The company considers these to be insignificant activities.

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

E.2.1 General Provisions Relating to NSPS Subpart Kb [326 IAC 12-1] [40 CFR 60, Subpart A]

Pursuant to 40 CFR Part 60, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the affected emission units at this source, except when otherwise specified in 40 CFR Part 60, Subpart Kb.

E.2.2 Volatile Organic Liquid Storage Vessels NSPS [40 CFR 60, Subpart Kb] [326 IAC 12]

The Permittee, which operates the volatile organic liquid storage vessels designated as tank Nos. 70 and 71, shall comply with the following provisions of 40 CFR Part 60, Subpart Kb (included as Appendix C of this permit), which are incorporated by reference as 326 IAC 12:

40 CFR 60.110b Applicability and designation of affected facility.

40 CFR 60.110b(a)

40 CFR 60.111b Definitions.

40 CFR 60.111b

40 CFR 60.112b Standard for volatile organic compounds (VOC).

40 CFR 60.112b(a)(3)

40 CFR 60.113b Testing and procedures.

40 CFR 60.113b(c)

40 CFR 60.115b Reporting and recordkeeping requirements.

40 CFR 60.115b(c)

40 CFR 60.116b Monitoring of operations.

40 CFR 60.116b(a)

40 CFR 60.116b(b)

40 CFR 60.116b(e)

40 CFR 60.116b(f)

40 CFR 60.116b(g)

SECTION E.3

EMISSION UNIT OPERATION CONDITIONS

Sulfuric Acid Regeneration Unit (Unit 4)

Emission Unit Description [326 IAC 2-7-5(15)]:

One (1) sulfuric acid regeneration unit, identified as Unit 4, with a maximum acid production rate of 58.33 tons per hour. Raw materials fed to the unit include spent sulfuric acid, molten sulfur, and other sulfur-bearing materials. The unit includes one (1) furnace firing natural gas and non-hazardous alternative fuels. The furnace is rated at two hundred sixty (260) MMBtu per hour. Acid mist emissions from Unit 4 are controlled by a Brinks mist eliminator before exhausting through one (1) stack, identified as D031. Sulfur dioxide emissions are controlled in the process by a double absorption system.

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

E.3.1 General Provisions Relating to NSPS Subpart H [326 IAC 12-1] [40 CFR 60, Subpart A]

Pursuant to 40 CFR Part 60, the Permittee shall comply with the provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, for the affected emission units at this source, except when otherwise specified in 40 CFR Part 60, Subpart H, Section D.8 of this permit, or by Appendix A (Alternative Monitoring Plan for SO₂ Emissions).

E.3.2 Sulfuric Acid Plant NSPS [40 CFR 60, Subpart H] [326 IAC 12] [Consent Decree 2:07CV134 WL]

The Permittee, which operates a sulfuric acid plant, shall comply with the following provisions of 40 CFR Part 60, Subpart H (included as Appendix B of this permit), which are incorporated by reference as 326 IAC 12, except when otherwise specified by Section D.8 of this permit, or by Appendix A (Alternative Monitoring Plan for SO₂ Emissions). The acid mist emission limit shall not be relaxed by any future permit action.

40 CFR 60.80 Applicability and designation of affected facility.

- 40 CFR 60.80(a)
- 40 CFR 60.80(b)

40 CFR 60.81 Definitions.

- 40 CFR 60.81(a)
- 40 CFR 60.81(b)

40 CFR 60.82 Standard for sulfur dioxide.

- 40 CFR 60.82(a)

40 CFR 60.83 Standard for acid mist.

- 40 CFR 60.83(a)
- 40 CFR 60.83(a)(1)
- 40 CFR 60.83(a)(2)

40 CFR 60.84 Emission monitoring.

- 40 CFR 60.84(a)
- 40 CFR 60.84(b)
- 40 CFR 60.84(c)
- 40 CFR 60.84(d)
- 40 CFR 60.84(e)

40 CFR 60.85 Test methods and procedures.

- 40 CFR 60.85(a)
- 40 CFR 60.85(b)
- 40 CFR 60.85(b)(1)

- 40 CFR 60.85(b)(2)
- 40 CFR 60.85(b)(3)
- 40 CFR 60.85(b)(4)
- 40 CFR 60.85(c)
- 40 CFR 60.85(c)(1)
- 40 CFR 60.85(c)(1)(i)
- 40 CFR 60.85(c)(1)(ii)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Rhodia, Inc.
Source Address: 2000 Michigan Street, Hammond, Indiana 46320
Mailing Address: Same
Part 70 Permit No.: T089-21241-00242

**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
- Emergency/Deviation Occurrence Reporting Form
- Test Result (specify)
- Report (specify)
- Notification (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**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: Rhodia, Inc.
Source Address: 2000 Michigan Street, Hammond, Indiana 46320
Mailing Address: Same
Part 70 Permit No.: T089-21241-00242

This form consists of 2 pages

Page 1 of 2

<p>— This is an emergency as defined in 326 IAC 2-7-1(12)</p> <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 and Enforcement Branch); and• The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865, IDEM and follow the other requirements of 326 IAC 2-7-16.

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

Emission Unit/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 emission unit 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**

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

Source Name: Rhodia, Inc.
 Source Address: 2000 Michigan Street, Hammond, Indiana 46320
 Mailing Address: Same
 Part 70 Permit No.: T089-21241-00242

Months: _____ to _____ Year: _____

Page 1 of 2

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



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

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

TO: Kia Zuber
Rhodia, Inc.
2000 Michigan Street
Hammond, Indiana 46320

DATE: November 17, 2009

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

SUBJECT: Final Decision
Title V
089-28658-00242

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:
Greg Yates (Rhodia, 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

Mail Code 61-53

IDEM Staff	CDENNY 11/17/2009 Rhodia, Inc. 089-28658-00242 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Kia Zuber Rhodia, Inc. 2000 Michigan St Hammond IN 46320 (Source CAATS)										
2		Greg Yates Plant Manager Rhodia, Inc. 2000 Michigan St Hammond IN 46320 (RO CAATS)										
3		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)										
6		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
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)										

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
14			

Mail Code 61-53

IDEM Staff	CDENNY 11/17/2009 Rhodia, Inc. 089-28658-00242 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	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		

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		Robert 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		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)									
6		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)									
7											
8											
9											
10											
11											
12											
13											
14											
15											

Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
6			