



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

Mr. Duane Pecci
Wolf Lake Terminals, Inc.
3200 Sheffield Avenue
Hammond, IN 46327

September 2, 2011

Re: 089-30323-00230
Review Request to
Part 70 Operating Permit No.: T089-28673-00230

Dear Mr. Pecci:

Wolf Lake Terminals, Inc., located at 3200 Sheffield Avenue, Hammond, Indiana 46327, submitted a review request on March 8, 2011. The letter was submitted to request clarification of information listed in two sections of the Technical Support Document (TSD) for Part 70 Operating Permit No. T089-28673-00230.

First, Wolf Lake Terminals, Inc. requested that the "Enforcement" section of the TSD should be clarified to accurately reflect events that occurred during the permit review process. IDEM, OAQ agrees that the TSD should have been worded to state that equipment may have been constructed and operated prior to receipt of the proper permit. The Permits Branch informed the Compliance and Enforcement Branch of a possible enforcement issue, and the Compliance and Enforcement Branch shall determine whether or not the equipment had received construction and operation approval. However, the TSD is used by IDEM, OAQ for historical purposes, and IDEM, OAQ does not make any changes to the original TSD. Therefore, IDEM, OAQ is clarifying the intent of the TSD, but cannot revise the TSD as requested.

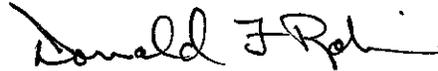
Second, Wolf Lake Terminals, Inc. requested that the "Integral Part of the Process Determination" section of the TSD should be removed because the condensers are processing emissions from storage tanks as well as the reactor and therefore cannot be considered integral to the process. IDEM, OAQ is clarifying that according to the TSD for HDEM Air Pollution Control Division Operation Permit No. 2595, issued on March 31, 2006, the chilled-water condenser was not considered a control device and that the condenser was determined to be integral to the process, even though the condenser vented the reactor as well as three storage tanks. However, for Part 70 Operating Permit T089-28673-00230, the calculations for the purposes of Part 70 applicability were done as though the condenser operation HX was not considered to be integral to the process. According to Appendix A of the TSD, the unrestricted emission calculations reflect this determination even though the "Integral Part of the Process Determination" section of the TSD states contradictory information. Therefore, the TSD should have been worded that the condenser operation HX is no longer integral to the process. As stated earlier though, the TSD is used by IDEM, OAQ for historical purposes, and IDEM, OAQ does not make any changes to the original TSD. Therefore, IDEM, OAQ is clarifying the intent of the TSD, but cannot revise the TSD as requested. Furthermore, IDEM, OAQ agrees that for any future permit modifications, the wording of the "Integral Part of the Process Determination" section of the TSD will reflect the determination that the condenser operation HX is no longer integral to the process.

Wolf Lake Terminals, Inc.
Hammond, Indiana
Permit Reviewer: John Haney

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RR: 089-30323-00230

Questions should be directed to John Haney, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for John Haney or extension 4-5328, or dial (317) 234-5328.

Sincerely,



Donald F. Robin, P.E., Section Chief
Permits Branch
Office of Air Quality

Attachments

DFR/jeh

cc: File – Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Compliance and Enforcement Branch



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

TO: Duane Pecci
Wolf Lake Terminals, Inc.
6200 Sheffield Ave
Hammond, IN 46327

DATE: September 2, 2011

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

SUBJECT: Final Decision
Review Request
089-30232-00230

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:
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 9/2/2011 Wolf Lake Terminals, Inc. 089-30323-00230 (final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
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1		Duane Pecci Wolf Lake Terminals, Inc. 6200 Sheffield Ave Hammond IN 46327 (Source CAATS)										
2		Duane Pecci HSSE Mgr Wolf Lake Terminals, Inc. 6200 Sheffield Ave Hammond IN 46327 (RO CAATS)										
3		East Chicago City Council 4525 Indianapolis Blvd East Chicago IN 46312 (Local Official)										
4		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)										
5		Hammond City Council and Mayors Office 5925 Calumet Avenue Hammond IN 46320 (Local Official)										
6		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)										
7		Lauren Pecina Bruce Carter Associates 616 S 4th Street Elkhart IN 46516 (Consultant)										
8		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
9		Ron Novak Hammond Dept. of Environmental Management 5925 Calumnet Ave. Hammond IN 46320 (Local Official)										
10		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
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