



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: November 17, 2011

RE: Veolia Water North American Operating Services, LLC/ 089-30995-00557

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

Notice of Decision: Approval - Registration

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 4-21.5-3-4(d) this order is effective when it is served. When served by U.S. mail, the order is effective three (3) calendar days from the mailing of this notice pursuant to IC 4-21.5-3-2(e).

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures
FN-REGIS.dot 1/2/08



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REGISTRATION OFFICE OF AIR QUALITY

Veolia Water North American Operating Services, LLC
4000 E. 7th Avenue
Gary, Indiana 46403

Pursuant to 326 IAC 2-5.1 (Construction of New Sources: Registrations) and 326 IAC 2-5.5 (Registrations), (herein known as the Registrant) is hereby authorized to construct and operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this registration.

Registration No. R089-30995-00557

Issued by:


Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Issuance Date

November 17, 2011

SECTION A

SOURCE SUMMARY

This registration 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 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Registrant 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 Registrant to obtain additional permits pursuant to 326 IAC 2.

A.1 General Information

The Registrant owns and operates a bio-solids sludge fertilizer (product) bagging and bulk shipment facility.

Source Address:	4000 E. 7th Avenue, Gary, Indiana 46403
General Source Phone Number:	708-652-0575
SIC Code:	2873 (Nitrogenous Fertilizers) and 5191 (Farm Supplies)
County Location:	Lake County
Source Location Status:	Nonattainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Registration

A.2 Emission Units and Pollution Control Equipment Summary

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

- (a) Three (3) fertilizer floor storage units located inside the building, identified as Emission Unit 1 (EU1), approved for construction in 2011, with a total maximum storage capacity of 350 tons per unit, exhausting indoors.
- (b) One (1) truck unloading operation located inside the building, identified as Emission Unit 1a (EU1a), approved for construction in 2011, for unloading of fertilizer pellets into the floor storage units at a maximum capacity of 25 tons per load, exhausting indoors. The fertilizer pellets are delivered to the site pre-treated and encapsulated with a dust control agent.
- (c) One (1) front end loader located inside the building, identified as Emission Unit 2 (EU2), approved for construction in 2011, for loading the payloader hopper at a maximum capacity of 20 tons per hour, exhausting indoors.
- (d) One (1) payloader hopper located inside the building, identified as Emission Unit 3 (EU3), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (e) Two (2) enclosed and covered drag conveyors located inside the building, identified as Emission Unit 4 (EU4), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (f) One (1) enclosed bucket elevator located inside the building, identified as Emission Unit 5 (EU5), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors. The drag conveyor (EU4) between the payloader hopper (EU3) and bucket elevator (EU5) is enclosed, and EU3 and EU5 are also enclosed.
- (g) One (1) Rotex Screener located inside the building, identified as Emission Unit 6 (EU6), approved for construction in 2011, consisting of three (3) screens and four (4) levels, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (h) Two (2) tripping conveyors located inside the building, identified as Emission Unit 7

(EU7), approved for construction in 2011, for conveying of the Agricultural Grade and Turf Grade Products to the fertilizer floor storage units (EU1) at a maximum capacity of 20 tons per hour, exhausting indoors.

- (i) One (1) truck loading operation located inside the building, identified as Emission Unit 1b (EU1b), approved for construction in 2011, consisting of the transfer of fertilizer pellets from the floor storage units (EU1) into bulk shipping trucks by front-end loaders at a maximum capacity of 20 tons per hour, exhausting indoors.
- (j) One (1) fertilizer storage and bagging operation located inside the building, identified as Emission Unit 8 (EU8), approved for construction in 2011, consisting of the following:
 - (1) One (1) bagging silo for storing Green Grade Product, identified as S1, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.
 - (2) One (1) bagging silo for storing Fairway Grade Product, identified as S2, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.

Particulate emissions from both bag filling operations are controlled by dust collector CE-1.

- (k) Vehicle traffic on unpaved roads.
- (l) One (1) 500-gallon diesel fuel aboveground storage tank, approved for construction in 2011.

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this registration 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 2-1.1-1) shall prevail.

B.2 Effective Date of Registration [IC 13-15-5-3]

Pursuant to IC 13-15-5-3, this registration is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

B.3 Registration Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation), this registration to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this registration.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this registration.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this registration shall not require revocation of this registration.
- (d) For any cause which establishes in the judgment of IDEM the fact that continuance of this registration is not consistent with purposes of this article.

B.4 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to Registration No. R089-30995-00557 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this registration.

B.5 Annual Notification [326 IAC 2-5.1-2(f)(3)] [326 IAC 2-5.5-4(a)(3)]

Pursuant to 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3):

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this registration.
- (b) The annual notice shall be submitted in the format attached no later than March 1 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, IN 46204-2251

- (c) The notification 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.

B.6 Source Modification Requirement [326 IAC 2-5.5-6(a)]

Pursuant to 326 IAC 2-5.5-6(a), an application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

B.7 Registrations [326 IAC 2-5.1-2(i)]

Pursuant to 326 IAC 2-5.1-2(i), this registration does not limit the source's potential to emit.

B.8 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this registration, the Registrant shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this registration or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Registrant's control, the PMPs cannot be prepared and maintained within the above time frame, the Registrant may extend the date an additional ninety (90) days provided the Registrant 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

The Registrant shall implement the PMPs.

- (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 Registrant to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions.
- (c) To the extent the Registrant is required by 40 CFR Part 60 or 40 CFR Part 63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such OMM Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-5.1-2(g)] [326 IAC 2-5.5-4(b)]

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 registration:

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

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

The Registrant 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).

SECTION D.1 OPERATION CONDITIONS

Facility Description [326 IAC 2-5.1-2(f)(2)] [326 IAC 2-5.5-4(a)(2)]:

- (a) Three (3) fertilizer floor storage units located inside the building, identified as Emission Unit 1 (EU1), approved for construction in 2011, with a total maximum storage capacity of 350 tons per unit, exhausting indoors.
- (b) One (1) truck unloading operation located inside the building, identified as Emission Unit 1a (EU1a), approved for construction in 2011, for unloading of fertilizer pellets into the floor storage units at a maximum capacity of 25 tons per load, exhausting indoors. The fertilizer pellets are delivered to the site pre-treated and encapsulated with a dust control agent.
- (c) One (1) front end loader located inside the building, identified as Emission Unit 2 (EU2), approved for construction in 2011, for loading the payloader hopper at a maximum capacity of 20 tons per hour, exhausting indoors.
- (d) One (1) payloader hopper located inside the building, identified as Emission Unit 3 (EU3), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (e) Two (2) enclosed and covered drag conveyors located inside the building, identified as Emission Unit 4 (EU4), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (f) One (1) enclosed bucket elevator located inside the building, identified as Emission Unit 5 (EU5), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors. The drag conveyor (EU4) between the payloader hopper (EU3) and bucket elevator (EU5) is enclosed, and EU3 and EU5 are also enclosed.
- (g) One (1) Rotex Screener located inside the building, identified as Emission Unit 6 (EU6), approved for construction in 2011, consisting of three (3) screens and four (4) levels, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (h) Two (2) tripping conveyors located inside the building, identified as Emission Unit 7 (EU7), approved for construction in 2011, for conveying of the Agricultural Grade and Turf Grade Products to the fertilizer floor storage units (EU1) at a maximum capacity of 20 tons per hour, exhausting indoors.
- (i) One (1) truck loading operation located inside the building, identified as Emission Unit 1b (EU1b), approved for construction in 2011, consisting of the transfer of fertilizer pellets from the floor storage units (EU1) into bulk shipping trucks by front-end loaders at a maximum capacity of 20 tons per hour, exhausting indoors.
- (j) One (1) fertilizer storage and bagging operation located inside the building, identified as Emission Unit 8 (EU8), approved for construction in 2011, consisting of the following:
 - (1) One (1) bagging silo for storing Green Grade Product, identified as S1, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.

(2)	One (1) bagging silo for storing Fairway Grade Product, identified as S2, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.
	Particulate emissions from both bag filling operations are controlled by dust collector CE-1.
(k)	Vehicle traffic on unpaved roads.
(l)	One (1) 500-gallon diesel fuel aboveground storage tank, approved for construction in 2011.
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)	

Emission Limitations and Standards [326 IAC 2-5.1-2(f)(1)] [326 IAC 2-5.5-4(a)(1)]

D.1.1 Particulate Matter Limitations For Lake County [326 IAC 6.8]

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), particulate matter (PM) emissions from each of the bio-solids sludge fertilizer (product) receiving, conveying, storage, bagging, and shipping facilities listed in this section shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.2 326 IAC 8-9 (VOC Rules; Volatile Organic Liquid Storage Vessels)

Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to IDEM, OAQ a report containing the following information for the diesel storage tank:

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

Pursuant to 326 IAC 8-9-6(a), these records shall be maintained for the life of the vessel.

D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan is required for the facilities listed in this section and any control devices. Section B - Preventive Maintenance Plan contains the Registrant's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination

D.1.4 Particulate Control

In order to comply with Condition D.1.1, the Registrant shall operate the dust collector CE-1 at all times when the bagging silos are in operation.

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

**REGISTRATION
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3) and 326 IAC 2-5.5-4(a)(3).

Company Name:	Veolia Water North American Operating Services, LLC
Address:	4000 E. 7th Avenue
City:	Gary, Indiana 46403
Phone Number:	708-652-0575
Registration No.:	R089-30995-00557

I hereby certify that Veolia Water North American Operating Services, LLC is:

- still in operation.
- no longer in operation.

I hereby certify that Veolia Water North American Operating Services, LLC is:

- in compliance with the requirements of Registration No. R089-30995-00557.
- not in compliance with the requirements of Registration No. R089-30995-00557.

Authorized Individual (typed):
Title:
Signature:
Phone Number:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Description and Location

Source Name:	Veolia Water North American Operating Services, LLC
Source Location:	4000 E. 7th Avenue, Gary, Indiana 46403
County:	Lake
SIC Code:	2873 (Nitrogenous Fertilizers), 5191 (Farm Supplies)
Registration No.:	R089-30995-00557
Permit Reviewer:	Susann Brown

On September 30, 2011, the Office of Air Quality (OAQ) received an application from Veolia Water North American Operating Services, LLC related to the construction and operation of a new bio-solids sludge fertilizer (product) bagging and bulk shipment facility.

Existing Approvals

There have been no previous approvals issued to this source.

County Attainment Status

The source is located in Lake County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Attainment effective February 18, 2000, for the part of the city of East Chicago bounded by Columbus Drive on the north; the Indiana Harbor Canal on the west; 148 th Street, if extended, on the south; and Euclid Avenue on the east. Unclassifiable or attainment effective November 15, 1990, for the remainder of East Chicago and Lake County.
O ₃	Attainment effective May 11, 2010, for the 8-hour ozone standard. ¹
PM ₁₀	Attainment effective March 11, 2003, for the cities of East Chicago, Hammond, Whiting, and Gary. Unclassifiable effective November 15, 1990, for the remainder of Lake County.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.
¹ The U. S. EPA has acknowledged in both the proposed and final rulemaking for this redesignation that the anti-backsliding provisions for the 1-hour ozone standard no longer apply as a result of the redesignation under the 8-hour ozone standard. Therefore, permits in Lake County are no longer subject to review pursuant to Emission Offset, 326 IAC 2-3. Basic nonattainment designation effective federally April 5, 2005, for PM _{2.5} .	

(a) **Ozone Standards**

Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Lake County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

- (b) **PM_{2.5}**
U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Lake County as nonattainment for PM_{2.5}. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a lawsuit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM_{2.5} promulgated on May 8, 2008. These rules became effective on July 15, 2008. Therefore, direct PM_{2.5} and SO₂ emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5.
- (c) **Other Criteria Pollutants**
Lake County has been classified as attainment or unclassifiable in Indiana for all other pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

The fugitive emissions of criteria pollutants, hazardous air pollutants, and greenhouse gases are counted toward the determination of 326 IAC 2-5.1-2 (Registrations) applicability.

Background and Description of Emission Units and Pollution Control Equipment

The Office of Air Quality (OAQ) has reviewed an application, submitted by Veolia Water North American Operating Services, LLC on September 30, 2011, relating to construction and operation of a new bio-solids sludge fertilizer (product) bagging and bulk shipment facility.

The following is a list of the new emission units:

- (a) Three (3) fertilizer floor storage units located inside the building, identified as Emission Unit 1 (EU1), approved for construction in 2011, with a total maximum storage capacity of 350 tons per unit, exhausting indoors.
- (b) One (1) truck unloading operation located inside the building, identified as Emission Unit 1a (EU1a), approved for construction in 2011, for unloading of fertilizer pellets into the floor storage units at a maximum capacity of 25 tons per load, exhausting indoors. The fertilizer pellets are delivered to the site pre-treated and encapsulated with a dust control agent.
- (c) One (1) front end loader located inside the building, identified as Emission Unit 2 (EU2), approved for construction in 2011, for loading the payload hopper at a maximum capacity of 20 tons per hour, exhausting indoors.
- (d) One (1) payload hopper located inside the building, identified as Emission Unit 3 (EU3), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (e) Two (2) enclosed and covered drag conveyors located inside the building, identified as Emission Unit 4 (EU4), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors.
- (f) One (1) enclosed bucket elevator located inside the building, identified as Emission Unit 5 (EU5), approved for construction in 2011, with a maximum capacity of 20 tons per hour, exhausting indoors. The drag conveyor (EU4) between the payload hopper (EU3) and bucket elevator (EU5) is enclosed, and EU3 and EU5 are also enclosed.
- (g) One (1) Rotex Screener located inside the building, identified as Emission Unit 6 (EU6), approved for construction in 2011, consisting of three (3) screens and four (4) levels, with a maximum

capacity of 20 tons per hour, exhausting indoors.

- (h) Two (2) tripping conveyors located inside the building, identified as Emission Unit 7 (EU7), approved for construction in 2011, for conveying of the Agricultural Grade and Turf Grade Products to the fertilizer floor storage units (EU1) at a maximum capacity of 20 tons per hour, exhausting indoors.
- (i) One (1) truck loading operation located inside the building, identified as Emission Unit 1b (EU1b), approved for construction in 2011, consisting of the transfer of fertilizer pellets from the floor storage units (EU1) into bulk shipping trucks by front-end loaders at a maximum capacity of 20 tons per hour, exhausting indoors.
- (j) One (1) fertilizer storage and bagging operation located inside the building, identified as Emission Unit 8 (EU8), approved for construction in 2011, consisting of the following:
 - (1) One (1) bagging silo for storing Green Grade Product, identified as S1, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.
 - (2) One (1) bagging silo for storing Fairway Grade Product, identified as S2, approved for construction in 2011, with a maximum silo filling rate of 20 tons per hour and a maximum bag filling rate of 10 tons per hour, exhausting indoors.

Particulate emissions from both bag filling operations are controlled by dust collector CE-1.

- (k) Vehicle traffic on unpaved roads.
- (l) One (1) 500-gallon diesel fuel aboveground storage tank, approved for construction in 2011.

Enforcement Issues

There are no pending enforcement actions related to this source.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – Registration

The following table reflects the unlimited potential to emit (PTE) of the entire source before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	Potential To Emit of the Entire Source (tons/year)									
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	GHGs as CO ₂ e**	Total HAPs	Worst Single HAP
Sludge Fertilizer Bagging Process	9.14	4.37	4.34	-	-	-	-	-	-	-
Unpaved roads (fugitive)	2.26	0.58	0.06	-	-	-	-	-	-	-
Aboveground Storage Tank (AST)	-	-	-	-	-	negl.	-	-	-	-
Total PTE of Entire Source	11.40	4.95	4.40	-	-	-	-	-	-	-
Exemptions Levels**	5	5	5	10	10	5	25	100,000	25	10
Registration Levels**	25	25	25	25	25	25	100	100,000	25	10

negl. = negligible
 *Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".
 **The 100,000 CO₂e threshold represents the Title V and PSD subject to regulation thresholds for GHGs in order to determine whether a source's emissions are a regulated NSR pollutant under Title V and PSD.
 Potential to emit calculations were not performed for the 500 gallon diesel Aboveground Storage Tank (AST) and are assumed to be negligible.

Criteria Pollutants (PM10, PM2.5, SO₂, NO_x, VOC, and CO)

- (a) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of PM is within the ranges listed in 326 IAC 2-5.1-2(a)(1). The PTE of all other regulated criteria pollutants are less than the ranges listed in 326 IAC 2-5.1-2(a)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registrations). A Registration will be issued.

Hazardous Air Pollutants

- (b) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) of any single HAP is less than ten (10) tons per year and the PTE of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-7.

Greenhouse Gases (GHGs) as CO₂e

- (c) The potential to emit (PTE) (as defined in 326 IAC 2-1.1-1) greenhouse gases (GHGs) is less than the Title V subject to regulation threshold of one hundred thousand (100,000) tons of CO₂ equivalent emissions (CO₂e) per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the New Source Performance Standard for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb (326 IAC 12), are not included in the permit, since the storage vessels at the source have a storage capacity of less than 75 cubic meters (m³) (19812.9 gallons).
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) The requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Chemical Manufacturing at Area Source, 40 CFR 63, Subpart VVVVVV (326 IAC 20), are not included in the permit, even though this operation falls under the SIC code of 28, because the process does not use, generate, or produce any of the chemicals listed in Table 1 of the rule. Therefore, the requirements of 40 CFR 63 Subpart VVVVVV do not apply.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the source:

- (a) 326 IAC 2-5.1-2 (Registrations)
Registration applicability is discussed under the Permit Level Determination – Registration section above.
- (b) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The potential to emit of any single HAP is less than ten (10) tons per year and the potential to emit of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, this source is an area source under Section 112 of the Clean Air Act (CAA) and not subject to the provisions of 326 IAC 2-4.1.
- (c) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), even though it is located in Lake County, it has actual emissions of NO_x and VOC of less than twenty-five (25) tons per year, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (d) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) 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.

- (2) 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.
- (e) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source 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.
- (f) 326 IAC 12 (New Source Performance Standards)
See Federal Rule Applicability Section of this TSD.
- (g) 326 IAC 20 (Hazardous Air Pollutants)
See Federal Rule Applicability Section of this TSD

Bio-solids sludge fertilizer (product) bagging and bulk shipment operation

- (h) 326 IAC 6.8 (Particulate Matter Limitations For Lake County)
This source is subject to the requirements of 326 IAC 6.8, because it is located in Lake County and it has the potential to emit particulate matter equal to or greater than 10 tons per year.

Pursuant to 326 IAC 6.8-1-2(a) (Particulate Matter Limitations For Lake County), particulate matter (PM) emissions from each of the bio-solids sludge fertilizer (product) receiving, conveying, storage, bagging, and shipping facilities shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

The Registrant will comply with this rule by operating the dust collector at all times when the bagging silos are operating.
- (i) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if a particulate limitation established in 326 IAC 6.8 is more stringent than the particulate limitation established in 326 IAC 6-3-2. Since the particulate limitations established by 326 IAC 6.8-1-2 for each facility are more stringent than the particulate limitations that would be established by 326 IAC 6-3-2, the source is not subject to the requirements of 326 IAC 6-3-2.

Diesel Storage Tank

- (j) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The diesel storage tank is not subject to the requirements of 326 IAC 8-1-6, since it is subject to the requirements of 326 IAC 8-9.
- (k) 326 IAC 8-4-3 (Petroleum Sources; Petroleum Liquid Storage Facilities)
Pursuant to 326 IAC 8-4-1(c) and 326 IAC 8-4-3(a), the diesel storage tank (constructed in 2011, 500 gallon capacity), which will be constructed after January 1, 1980, is not subject to the requirements of 326 IAC 8-4-3, since it has a storage capacity less than thirty-nine thousand (39,000) gallons and stores diesel fuel which has a true vapor pressure less than 1.52 psi at the storage temperature.
- (l) 326 IAC 8-7 (VOC Rules: Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)
Pursuant to 326 IAC 8-7-2(a), this source is not subject to the requirements of 326 IAC 8-7, even though it is located in Lake County because it has unlimited VOC potential emissions of less than twenty-five (25) tons per year.

- (m) 326 IAC 8-9 (VOC Rules; Volatile Organic Liquid Storage Vessels)
Pursuant to 326 IAC 8-9-1(a), the diesel storage tank is subject to the requirements of 326 IAC 8-9, since it will be located in Lake County, is not subject to 40 CFR 60, Subpart Kb, and will store a volatile organic liquid (VOL) as defined by 326 IAC 8-9-3(10).

Pursuant to 326 IAC 8-9-1(b), each stationary vessel with a capacity of less than thirty-nine thousand (39,000) gallons is subject to the following reporting and record keeping provisions of 326 IAC 8-9-6(a) and 326 IAC 8-9-6(b) and are exempt from all other provisions of 326 IAC 8-9:

Pursuant to 326 IAC 8-9-6(b), the Permittee shall maintain a record and submit to IDEM, OAQ a report containing the following information for the diesel storage tank:

- (1) The vessel identification number;
- (2) The vessel dimensions; and
- (3) The vessel capacity.

Pursuant to 326 IAC 8-9-6(a), these records shall be maintained for the life of the vessel.

Compliance Monitoring and Testing Requirement

Emission Factors used to calculate the potential to emit are from AP-42 Table 11.12-2, Emission Factors for Concrete Batching, because there are no established AP-42 emission factors for this type of fertilizer operation and the product is approximately the same size and density as aggregate transfer.

Since the emission factors used to determine the potential to emit of this source are from Concrete Batching, AP-42, the dust collector CE-1 will be required to be in operation at all times the bagging silos are in operation.

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on September 30, 2011.

The construction and operation of this source shall be subject to the conditions of the attached proposed Registration No. R089-30995-00557. The staff recommends to the Commissioner that this Registration be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Susann Brown at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5176 or toll free at 1-800-451-6027 extension 45176.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) 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.in.gov/idem

**Appendix A: Emissions Calculations
Emission Summary**

Company Name: Veolia Water North American Operating Services, LLC
Source Address: 4000 E. 7th Avenue Gary, IN 46403 (Lake County)
Permit Number: R089-30995-00557
Reviewer: Calculations submitted by Linda Bobo (Patriot Engineering & Environmental Inc.)
and reviewed by Susann Brown

Process Description	Uncontrolled Potential to Emit (PTE) (tons/year)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO ₂ e	Total HAPs	Worst Single HAP
Sludge Fertilizer Bagging Process	9.14	4.37	4.34	-	-	-	-	-	-	-
Diesel Aboveground Storage Tank (AST)	-	-	-	-	-	negl.	-	-	negl.	negl.
Unpaved Roads (fugitive)	2.26	0.58	0.06	-	-	-	-	-	-	-
Total PTE	11.40	4.95	4.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Process Description	Controlled Potential to Emit (PTE) (tons/year)									
	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as	Total	Worst Single
Sludge Fertilizer Bagging Process	8.87	4.24	4.21	-	-	-	-	-	-	-
Diesel Aboveground Storage Tank (AST)	-	-	-	-	-	negl.	-	-	negl.	negl.
Unpaved Roads (fugitive)	2.26	0.58	0.06	-	-	-	-	-	-	-
Total PTE	11.13	4.82	4.27	0.00						

negl.= negligible

Using the Environmental Protection Agency's (EPA) TANKS Version 4.09d program, it was determined that use and storage of diesel fuel would have negligible potential emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

**Appendix A: Emission Calculations
Sludge Fertilizer Bagging Process Emissions**

Company Name: Veolia Water North American Operating Services, LLC Page 2 of 3 TSD App A
 Source Address: 4000 E. 7th Avenue Gary, IN 46403 (Lake County)
 Permit Number: R089-30995-00557
 Reviewer: Calculations submitted by Linda Bobo (Patriot Engineering & Environmental Inc.)
 and reviewed by Susann Brown

Potential to Emit (PTE) PM, PM10, and PM2.5

Emission Unit ID	Process Description	Maximum Throughput (tons/year)	Emission Factor (lbs/ton)	Pollutant	PTE Before Control (tons/yr)	PTE Before Control (tons/yr)	Overall Control Efficiency	PTE After Control (tons/yr)
EU1A	Truck Unloading to Ground Floor Storage	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU1	Incoming Material Ground Floor Storage	175200	0.000284	PM	49.76	0.02	0	0.02
		175200	0.000134	PM10	23.48	0.01	0	0.01
		175200	0.000203	PM2.5	3.56	0.002	0	0.002
EU2	Front End Loader Moving Material to Payloader Hopper	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU3	Payloader Hopper to Drag Conveyor	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU4	Drag Conveyor to Bucket Elevator	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU5	Bucket Elevator	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU6	Rotex Screener Green Grade	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU6	Rotex Screener Fairway Grade	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU6	Rotex Screener Turf Grade	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU6	Rotex Screener Agricultural Grade	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU7	Tripper Conveyor from Green Grade Screener	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU7	Tripper Conveyor from Fairway Grade Screener	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU1	Ground Floor storage 1	175200	0.000284	PM	49.76	0.02	0	0.02
		175200	0.000134	PM10	23.48	0.01	0	0.01
		175200	0.000203	PM2.5	3.56	0.002	0	0.002
EU1	Ground Floor storage 2	175200	0.000284	PM	49.76	0.02	0	0.02
		175200	0.000134	PM10	23.48	0.01	0	0.01
		175200	0.000203	PM2.5	3.56	0.002	0	0.002
EU1B	Front-End Loader to Bulk Trucks inside Bldg for Bulk Shipments	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU4	Covered & Enclosed in Bldg, Drag Conveyor to Super Sack Bagging Silo	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU4	Covered & Enclosed in Bldg, Drag Conveyor to Super Sack Bagging Silo	175200	0.0069	PM	1208.88	0.60	0	0.60
		175200	0.0033	PM10	578.16	0.29	0	0.29
		175200	0.0033	PM2.5*	578.16	0.29	0	0.29
EU8	Super Sack Bagging Silo 1 to Super Sack	87600	0.0069	PM	604.44	0.30	90.25%	0.029
		87600	0.0033	PM10	289.08	0.14	90.25%	0.014
		87600	0.0033	PM2.5*	289.08	0.14	90.25%	0.014
EU8	Super Sack Bagging Silo 2 to Super Sack	87600	0.0069	PM	604.44	0.30	0	0.30
		87600	0.0033	PM10	289.08	0.14	0	0.14
		87600	0.0033	PM2.5*	289.08	0.14	0	0.14

Totals		
Pollutant	PTE Before Control (tons/yr)	PTE After Control (tons/yr)
PM	9.14	8.87
PM10	4.37	4.24
PM2.5	4.34	4.21

METHODOLOGY
 NOTE: All operations occur inside the building
 Based on the maximum capacity of the equipment (20 tons/hr), the maximum throughput for 8760 hours/year is 175200 tons/year
 Bagging Silos 1 & 2 maximum bag filling capacity (10 tons/hr), the maximum throughput for 8760 hours/year is 87600 tons/year
 Emission Factors used are from AP-42 Table 11.12-2, Emission Factors for Concrete Batching, because there are not established AP-42 emission factors for this type of fertilizer operation and the product is approximately the same size and density as aggregate transfer.
 Since the floor storage piles are located inside the building, there would be no fugitive dust emissions from wind erosion. However, as a worst case estimate, emission factors for storage piles at a similar fertilizer mixing, storage, and distribution operation were used (see FESOP No. F069-29024-00084, issued August 3, 2010)
 *PM2.5 emissions assumed equal to PM10 emissions

$$\text{PTE Before Control (lbs/yr)} = [\text{Maximum Throughput (tons/year)}] * [\text{Emission Factor (lbs/ton)}]$$

$$\text{PTE Before Control (tons/yr)} = [\text{PTE Before Control (lbs/yr)}] * [1/2000 \text{ lbs}]$$

$$\text{PTE After Control (tons/yr)} = [\text{PTE Before Control (tons/yr)}] * [1 - \text{Overall Control Efficiency}]$$
 The Overall Control Efficiency for dust collector CE1 on Bagging Silo #1 is calculated as follows:

$$\text{Overall Control Efficiency} = [\text{Capture Efficiency}] * [\text{Control Efficiency}] = [95.0\%] * [95.0\%] = 90.25\%$$

**Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads**

Company Name: Veolia Water North American Operating Services, LLC
Source Address: 4000 E. 7th Avenue Gary, IN 46403 (Lake County)
Permit Number: R089-30995-00557
Reviewer: Calculations submitted by Linda Bobo (Patriot Engineering & Environmental Inc.)
 and reviewed by Susann Brown

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (11/2006).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	24.0	1.0	24.0	25.0	600.0	422	0.080	1.9	700.1
Vehicle (leaving plant) (one-way trip)	24.0	1.0	24.0	25.0	600.0	422	0.080	1.9	700.1
Totals			48.0		1200.0			3.8	1400.3

Maximum Vehicle Weight Per Trip = $\frac{25.0}{1}$ tons/trip
 Maximum Miles Per Trip = $\frac{0.08}{1}$ miles/trip

Unmitigated Emission Factor, Ef = $k \left[\frac{s}{12} \right]^a \left[\frac{1}{(W/3)^b} \right]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10	PM2.5	
where k =	4.9	1.5	0.15	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-1 Sand/Gravel Processing Plant)
a =	0.7	0.9	0.9	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)
W =	12.5	12.5	12.5	tons = average vehicle weight (provided by source)
b =	0.45	0.45	0.45	= constant (AP-42 Table 13.2.2-2 for Industrial Roads)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, Eext = $E * \left[\frac{365 - P}{365} \right]$ (Equation 2 from AP-42 13.2.2)

Mitigated Emission Factor, Eext = $E * \left[\frac{365 - P}{365} \right]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10	PM2.5	
Unmitigated Emission Factor, Ef =	4.90	1.25	0.12	lb/mile
Mitigated Emission Factor, Eext =	3.22	0.82	0.08	lb/mile

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10 (tons/yr)	Unmitigated PTE of PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10 (tons/yr)	Mitigated PTE of PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.72	0.44	0.04	1.13	0.29	0.03
Vehicle (leaving plant) (one-way trip)	1.72	0.44	0.04	1.13	0.29	0.03
Totals	3.43	0.88	0.09	2.26	0.58	0.06

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (<2.5 um)
 PTE = Potential to Emit



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: Steve Waters
Veolia Water North American Operating Services, LLC
4000 E. 7th Avenue
Gary, Indiana 46403

DATE: November 17, 2011

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

SUBJECT: Final Decision
Registration
089-30995-00557

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:
Linda Bobo, Consultant
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	PWAY 11/16/2011 Veolia Water North American Operating Services, LLC 089-30995-00557 (final)		AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender	 Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204	Type of Mail: CERTIFICATE OF MAILING ONLY	

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											Remarks
1		Steve Waters Veolia Water North American Operating Services, LL PO Box 53 Lyons IL 60534 (Source CAATS)									
2		Gary - Hobart Water Corp 650 Madison St, P.O. Box M486 Gary IN 46401-0486 (Affected Party)									
3		Lake County Health Department-Gary 1145 W. 5th Ave Gary IN 46402-1795 (Health Department)									
4		WJOB / WZVN Radio 6405 Olcott Ave Hammond IN 46320 (Affected Party)									
5		Laurence A. McHugh Barnes & Thornburg 100 North Michigan South Bend IN 46601-1632 (Affected Party)									
6		Shawn Sobocinski 3229 E. Atlanta Court Portage IN 46368 (Affected Party)									
7		Ms. Carolyn Marsh Lake Michigan Calumet Advisory Council 1804 Oliver St Whiting IN 46394-1725 (Affected Party)									
8		Mark Coleman 9 Locust Place Ogden Dunes IN 46368 (Affected Party)									
9		Mr. Chris Hernandez Pipefitters Association, Local Union 597 8762 Louisiana St., Suite G Merrillville IN 46410 (Affected Party)									
10		Craig Hogarth 7901 West Morris Street Indianapolis IN 46231 (Affected Party)									
11		Lake County Commissioners 2293 N. Main St, Building A 3rd Floor Crown Point IN 46307 (Local Official)									
12		Anthony Copeland 2006 E. 140th Street East Chicago IN 46312 (Affected Party)									
13		Barbara G. Perez 506 Lilac Street East Chicago IN 46312 (Affected Party)									
14		Mr. Robert Garcia 3733 Parrish Avenue East Chicago IN 46312 (Affected Party)									
15		Linda Bobo Patriot Engineering and Environmental, Inc. 6330 E 75th Street Suite 216 Indianapolis IN 46250 (Consultant)									

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2		Calumet Township Trustee 31 E 5th Avenue Gary IN 46402 (Affected Party)										
3		Joseph Hero 11723 S Oakridge Drive St. John IN 46373 (Affected Party)										
4		Gary City Council 401 Broadway # 209 Gary IN 46402 (Local Official)										
5		Mr. Larry Davis 268 South, 600 West Hebron IN 46341 (Affected Party)										
6		Gitte Laasby Post Tribune 1433 E. 83rd Ave Merrillville IN 46410 (Affected Party)										
7		Susan Severtson City of Gary Law Dept. 401 Broadway 4th Floor Gary IN 46402 (Local Official)										
8		Mark Zeltwanger 26545 CR 52 Nappanee IN 46550 (Affected Party)										
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