



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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

TO: Interested Parties / Applicant

DATE: May 30, 2013

RE: E.G. Hill / 177-33017-00007

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

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

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

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

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

Enclosures  
FNPER.dot12/03/07



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Mr. Lindley Mann  
E. G. Hill Company, Inc.  
P. O. Box 998  
Richmond, IN 47375

May 30, 2013

Re: Source Specific Operating Agreement (SSOA)  
No. S177-33017-00007

Dear Mr. Mann:

Joseph Hill Company operated fourteen (14) boilers for generating steam heat from approximately 1946 until 1994 at their stationary greenhouse facilities located at 2700 Peacock Rd and 2301 Peacock Road, Richmond, Indiana 47374. These units were registered with IDEM prior to 1980 and were assigned a Plant IDs of 177-00007 and 177-00032. In 1994, the Joseph Hill Company closed its business and ceased operations, but the boilers were not removed from the site. On March 28, 2013, the Office of Air Quality (OAQ) received an application from the E. G. Hill Company, Inc. (the new owner/operator of both sites) requesting approval to operate the existing boilers under a Source Specific Operating Agreement (SSOA). IDEM OAQ records have been updated to indicate that both sites are now owned and operated by E. G. Hill Company, Inc. Pursuant to the provisions of 326 IAC 2-9, the Permittee is hereby authorized to operate subject to the conditions contained in the attached Source Specific Operating Agreement (SSOA).

## **Source Determination**

E. G. Hill Company, Inc. owns and operates two greenhouses on Peacock Road in Richmond. The main greenhouse, plant ID 177-00007, is located on the north side of the road, at 2700 Peacock Road. The smaller greenhouse, plant ID 177-00032, is on the south side of the road at 2301 Peacock Road. The two plant properties are less than 500 feet apart. IDEM, OAQ has examined whether these plants are part of the same source. The term "source" is defined at 326 IAC 1-2-73. In order for two plants to be considered one source, they must meet all three of the following criteria:

- (1) the plants must be under common ownership or common control;
- (2) the plants must have the same two-digit Standard Industrial Classification (SIC) Code or one must serve as a support facility for another; and,
- (3) the plants must be located on contiguous or adjacent properties.

E. G. Hill Company, Inc. owns both plants. Therefore the plants are under common ownership, meeting the first part of the source definition.

The Standard Industrial Classification Code Manual of 1987 sets out how to determine the proper SIC Code for each type of business. More information about SIC Codes is available at [http://www.osha.gov/pls/imis/sic\\_manual.html](http://www.osha.gov/pls/imis/sic_manual.html) on the Internet. The SIC Code is determined by looking at the principal product or activity of each plant. Both plants have the two-digit SIC Code 01 for the Major Group Agricultural Production-Crops. This major group includes the four-digit SIC Code 0181 for Ornamental Floriculture and Nursery Products.

A plant is a support facility to another plant if it dedicates 50% or more of its output to the other plant. Neither plant sends any greenhouse output to the other plant. The north plant does supply water to the south plant. Since neither plant dedicates 50% or more of its output to the other, there is no support facility relationship. However, since the plants have the same two-digit SIC Code the second part of the source definition is met.

The last part of the definition is whether the plants are on the same, contiguous or adjacent properties. The plants are not located on the same or contiguous properties. Therefore IDEM, OAQ must determine if the plants are located on adjacent properties.

The term "adjacent" is not defined in Indiana's rules. IDEM's nonrule policy document NPD Air-005 is guidance for applying the definition of "major source" in 326 IAC 2-1-7(22). Since the definitions of "source" and "major source" are nearly identical regarding adjacent properties, NPD Air-005 is helpful in apply the definition of "source". NPD Air-005 adds the following guidance:

- properties that actually abut at any point would satisfy the requirement of contiguous or adjacent property.
- properties that are separated by a public road or public property would satisfy this requirement, absent special circumstances.
- other scenarios would be examined on an individual basis with the focus on the distance between the activities and the relationship between the activities.

The U.S. EPA has a similar view on how to interpret the term "adjacent" when defining a source. Two U.S. EPA letters; the May 21, 1988 letter from U.S. EPA Region 8 to the Utah Division of Air Quality, and the U.S. EPA Region 5 letter dated October 18, 2010 to Scott Huber at Summit Petroleum Corporation, discuss the term "adjacent" as it is used in making major source determinations. These letters are not binding on IDEM but they are persuasive for two reasons. The letters follow the guidance in NPD Air-005 that IDEM will examine both the distance between the sources and their relationship and, secondly, they illustrate a longstanding U.S. EPA analysis used to determine if two sources are "adjacent" going back to the preamble to the 1980 NSR program definition of "major source". U.S. EPA's consistent approach is that any evaluation of what is "adjacent" must relate to the guiding principal of a common sense notion of "source".

All IDEM evaluations of adjacency are done on a case-by-case basis looking at the specific factors for the plants involved. In addition to determining the distance between the plant properties, IDEM asks:

- (1) Are materials routinely transferred between the plants?
- (2) Do managers or other workers frequently shuttle back and forth to be involved actively in the plants?
- (3) Is the production process itself split in any way between the plants?

These questions focus on whether the separate sources are so interrelated that they are functioning as one plant, and whether the distance between them is small enough that it enables them to operate as one plant. U.S. EPA Assistant Administrator Gina McCarty issued a memorandum on September 22, 2009 that confirmed U.S. EPA's view that each source determination must be done on a case-by-case basis and stated that after that analysis is completed it may be that physical proximity serves as an overwhelming factor in determining if the plants are adjacent.

A dedicated, company owned, water line runs between the two plants, supplying water to the south plant. The plants do not share production workers. The production process is not split between the plants. One manager travels between the plants on a daily basis. Less than 500 feet separates the two plant properties. The north plant property is over 1,000 feet long and the south plant property is over 500 feet long. The two plant properties are physically quite close to each other. Considering all these factors,

IDEM, OAQ finds that the plants are located on adjacent properties and therefore meet the third part of the source definition.

The plants meet all three parts of the source definition. Therefore, IDEM, OAQ finds that the two E. G. Hill Company, Inc. greenhouses, plant ID 177-00007 and plant ID 177-00032, are part of the same source.

### **Federal Rule Applicability**

The source has been evaluated to determine applicability of the following New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) rules:

- (a) The requirements of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40b, Subpart Db (326 IAC 12), are not included in this SSOA, since each of the boilers is less than 100 million British thermal units per hour (MMBtu/hr).
- (b) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40c, Subpart Dc (326 IAC 12), are not included in this SSOA, since each of the boilers was constructed before June 9, 1989.
- (c) The requirements of the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60.40, Subpart Dc (326 IAC 12), are not included in this SSOA, since each of the boilers was constructed before June 9, 1989.
- (d) The requirements of the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources, 40 CFR 63.11193, Subpart JJJJJJ (326 IAC 20), are not included in this SSOA, since the boilers are exempt from this rule as they are natural gas-fired boilers, pursuant to 40 CFR 63.11195(e) that meets the definition of gas fired boilers, pursuant to 40 CFR 6311237.
- (e) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this SSOA .
- (f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included in this SSOA.

### **Emission Calculations**

See Attachment A of this letter for detailed emission calculations.

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](http://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 Bruce Farrar of my staff at 317-234-5401 or 1-800-451-6027, and ask for extension 4-5401.

Sincerely,



Nathan C. Bell,  
Section Chief  
Permits Branch  
Office of Air Quality

Attachments: SSOA and Emission Calculations

NB/bf

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



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## SOURCE SPECIFIC OPERATING AGREEMENT OFFICE OF AIR QUALITY

**E. G. Hill Company, Inc.  
2700 Peacock Rd. and  
2301 Peacock Rd.,  
Richmond, IN 47374**

(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 SSOA.

This SSOA is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-9 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this SSOA, are those applicable at the time the SSOA was issued. The issuance or possession of this SSOA shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.

Source Specific Operating Agreement No. S177-33017-00007

Issued by:

Nathan C. Bell, Section Chief  
Permits Branch  
Office of Air Quality

Issuance Date:

May 30, 2013

## SECTION A

## SOURCE SUMMARY

This SSOA 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 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 pursuant to 326 IAC 2.

### A.1 General Information

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The Permittee owns and operates a stationary greenhouse.

Source Address:	2700 Peacock Rd, Richmond, Indiana 47374 2301 Peacock Rd, Richmond, Indiana 47374
General Source Phone Number:	(765) 973-6700
SIC Code:	0181
County Location:	Wayne County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Source Specific Operating Agreement (SSOA) Not 1 of 28 Source Categories

### A.2 Source Definition

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This E. G. Hill Company, Inc. company consists of two (2) plants:

- (a) Plant 1 (main greenhouse), plant ID 177-00007, located on the north side of the road, at 2700 Peacock Road, Richmond, Indiana 47374; and
- (b) Plant 2 (smaller greenhouse), plant ID 177-00032, located on the south side of the road at 2301 Peacock Road, Richmond, Indiana 47374.

Since the two (2) plants are under common ownership, belong to the same industrial grouping, and are located on contiguous or adjacent properties, they will be considered one (1) source effective from the date of issuance of this SSOA.

### A.3 Source Summary

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This stationary source consists of the following: External Combustion Sources [326 IAC 2-9-13]

### A.4 SSOA Applicability [326 IAC 2-9-1]

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- (a) This source, otherwise required to have a permit under 326 IAC 2-5.1, 326 IAC 2-5.5, 326 IAC 2-6.1, 326 IAC 2-7, or 326 IAC 2-8, has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Source Specific Operating Agreement (SSOA) under 326 IAC 2-9.
- (b) Pursuant to 326 IAC 2-9-1(g), the source may apply for up to four (4) different SSOAs contained in 326 IAC 2-9.

## **SECTION B GENERAL CONDITIONS**

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

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Terms in this SSOA 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 Enforceability**

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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.3 Severability**

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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.4 Property Rights or Exclusive Privilege**

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

### **B.5 Duty to Provide Information**

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- (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. 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.6 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of permits established prior to SSOA No. S177-33017-00007 and issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

### **B.7 Annual Notification [326 IAC 2-9-1(d)]**

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Pursuant to 326 IAC 2-9-1(d):

- (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 SSOA.
- (b) The annual notice shall be submitted in the format attached no later than January 30 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.8 Source Modification Requirement [326 IAC 2-9-1(e)]**

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Pursuant to 326 IAC 2-9-1(e), before the Permittee modifies its operations in such a way that it will no longer comply with the applicable restrictions and conditions of this SSOA, it shall obtain the appropriate approval from IDEM, OAQ under 326 IAC 2-2, 326 IAC 2-3, 326 IAC 2-4.1, 326 IAC 2-5.1, 326 IAC 2-6.1, 326 IAC 2-7, and 326 IAC 2-8.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [IC 13-14-2-2] [IC 13-17-3-2] [IC 13-30-3-1]**

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

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

**B.10 Permit Revocation [326 IAC 2-1.1-9] [326 IAC 2-9-1(j)]**

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- (a) Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:
- (1) Violation of any conditions of this permit.
- (2) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (3) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
  - (4) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
  - (5) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.
- (b) Pursuant to 326 IAC 2-9-1(j), noncompliance with any applicable provision 326 IAC 2-9 or any requirement contained in this SSOA may result in the revocation of this SSOA and make this source subject to the applicable requirements of a major source.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source

### Emission Limitations and Standards [326 IAC 2-9]

#### C.1 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).

### Compliance Requirements [326 IAC 2-1.1-11] [326 IAC 2-9]

#### C.2 Compliance with Applicable Requirements [326 IAC 2-9-1(i)]

Pursuant to 326 IAC 2-9-1(i), the owner or operator is hereby notified that this operating agreement does not relieve the Permittee of the responsibility to comply with the provisions of any applicable federal, state, or local rules, or any New Source Performance Standards (NSPS), 40 CFR Part 60, or National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61 or 40 CFR Part 63.

### Record Keeping and Reporting Requirements [326 IAC 2-9]

#### C.3 General Record Keeping Requirements [326 IAC 2-9-1(f)]

Pursuant to 326 IAC 2-9-1(f), records of all required monitoring data, reports and support information required by this SSOA shall be physically present or electronically accessible at the source location for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### C.4 Reporting Requirements [326 IAC 2-9-1(h)]

Pursuant to 326 IAC 2-9-1(h), any exceedance of any requirement contained in this operating agreement shall be reported, in writing, within one (1) week of its occurrence. Said report shall include information on the actions taken to correct the exceedance, including measures to reduce emissions, in order to comply with the established limits. If an exceedance is the result of a malfunction, then the provisions of 326 IAC 1-6 apply.

## SECTION D.1

## OPERATION CONDITIONS

Operation Description: External Combustion Sources [326 IAC 2-9-13]

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

### Emission Limitations and Standards [326 IAC 2-9]

#### D.1.1 External Combustion Sources Limitation [326 IAC 2-9-13(b)(2)(B)]

Pursuant to 326 IAC 2-9-13(b)(2)(B), the fuel usage for the external combustion units at this source shall be limited as follows:

- (a) less than one thousand one hundred fifteen million cubic feet (1115 MMcf) of natural gas per twelve (12) consecutive month period, and
- (b) less than one hundred eighty-seven kilogallons (187 kgal) of #1 or #2 distillate oil, or any combination of #1 or #2 oil, per twelve (12) consecutive month period.

#### D.1.2 Opacity [326 IAC 2-9-13(b)(1)]

Pursuant to 326 IAC 2-9-13(b)(1), the visible emissions from the source shall not exceed twenty percent (20%) opacity in twenty-four (24) consecutive readings in a six (6) minute period. The opacity shall be determined using 40 CFR 60, Appendix A, Method 9.

### Record Keeping and Reporting Requirements [326 IAC 2-9]

#### D.1.3 Record Keeping Requirements [326 IAC 2-9-13(e)]

Pursuant to 326 IAC 2-9-13(e), the source shall keep the following records for the external combustion units:

- (a) the monthly hours operated for each external combustion unit,
- (b) records of the annual fuel usage for each external combustion unit, and
- (c) records of all routine maintenance conducted on the external combustion units.

Section C - General Record Keeping Requirements of this SSOA contains the Permittee's obligations with regard to the records required by this condition.

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

**SOURCE SPECIFIC OPERATING AGREEMENT (SSOA)  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-9.

<b>Company Name:</b>	E. G. Hill Company, Inc.
<b>Address:</b>	2700 Peacock Rd. and 2301 Peacock Rd.
<b>City:</b>	Richmond, IN 47374
<b>Phone #:</b>	(765) 973-6700
<b>SSOA #:</b>	S177-33017-00007

I hereby certify that E. G. Hill Company, Inc. is:

still in operation.

no longer in operation.

I hereby certify that E. G. Hill Company, Inc. is:

in compliance with the requirements  
of SSOA S177-33017-00007

not in compliance with the requirements  
of SSOA S177-33017-00007.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

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.

<b>Noncompliance:</b>

**Attachment A: Emission Calculations  
Emissions Summary**

**Company Name:** E. G. Hill Company, Inc.  
**Source Address:** 2700 Peacock Rd. Richmond, IN 47374  
**SSOA No.:** 177-33017-00007  
**Reviewer:** Bruce Farrar

Limited/Uncontrolled Potential to Emit (PTE) (tons/year)											
Emission Unit/Activity	PM	PM10	PM2.5	SO2	NOx	VOC	CO	GHGs as CO2e	Total HAPs	Worst Single HAP	
External Combustion - Fuel Oil #1 and #2	0.19	0.22	0.20	6.64	1.87	0.03	0.47	2018	6.4E-04	2.0E-04	Selenium
External Combustion - Natural Gas	1.06	4.24	4.24	0.33	55.75	3.07	46.83	67307	1.05	1.00	Hexane
<b>Totals</b>	<b>1.25</b>	<b>4.46</b>	<b>4.44</b>	<b>6.97</b>	<b>57.62</b>	<b>3.10</b>	<b>47.30</b>	<b>69325</b>	<b>1.05</b>	<b>1.00</b>	<b>Hexane</b>

**Attachment A: Emission Calculations**  
**Commercial/Institutional/Residential Combustors (< 100 MMBtu/hr)**  
**#1 and #2 Fuel Oil**

**Company Name:** E. G. Hill Company, Inc.  
**Source Address:** 2700 Peacock Rd. Richmond, IN 47374  
**SSOA No.:** 177-33017-00007  
**Reviewer:** Bruce Farrar

SSOA Limited  
 Fuel Usage  
 kgals/year  
 187

SSOA Limited  
 Fuel Usage  
 MMBtu/year  
 26180

S = Weight % Sulfur  
 0.5

Emission Factor in lb/kgal	Pollutant						
	PM*	PM10	direct PM2.5	SO2 71 (142.0S)	NOx 20.0	VOC 0.34	CO 5.0
Potential Emission in tons/yr	0.19	0.22	0.20	6.64	1.87	0.03	0.47

**Methodology**

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

SSOA Limited Fuel Usage (MMBtu/yr) = [SSOA Limited Fuel Usage (kgals/yr)] \* [140 MMBtu/kgal]

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

\*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Potential Emission (tons/yr) = [SSOA Limited Fuel Usage (kgal/yr)] \* [Emission Factor (lb/kgal)] / [2,000 lb/ton]

Emission Factor in lb/mmBtu	HAPs - Metals				
	Arsenic	Beryllium	Cadmium	Chromium	Lead
Potential Emission in tons/yr	4.0E-06	3.0E-06	3.0E-06	3.0E-06	9.0E-06
	5.24E-05	3.93E-05	3.93E-05	3.93E-05	1.18E-04

Emission Factor in lb/mmBtu	HAPs - Metals (continued)			
	Mercury	Manganese	Nickel	Selenium
Potential Emission in tons/yr	3.0E-06	6.0E-06	3.0E-06	1.5E-05
	3.93E-05	7.85E-05	3.93E-05	1.96E-04

<b>Potential Emission of Total HAPs (tons/yr)</b>		<b>6.41E-04</b>
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**Methodology**

No data was available in AP-42 for organic HAPs.

Potential Emission (tons/yr) = [SSOA Limited Fuel Usage (MMBtu/yr)] \* [Emission Factor (lb/MMBtu)] / [2,000 lb/ton]

Emission Factor in lb/kgal	Greenhouse Gas		
	CO2	CH4	N2O
Potential Emission in tons/yr	21,500	0.216	0.26
	2,010	0.0	0.0
Summed Potential Emissions in tons/yr	2,010		
CO2e Total in tons/yr	2,018		

**Methodology**

The CO2 Emission Factor for #1 Fuel Oil is 21500. The CO2 Emission Factor for #2 Fuel Oil is 22300.

Emission Factors are from AP 42, Tables 1.3-3, 1.3-8, and 1.3-12 (SCC 1-03-005-01/02/03) Supplement E 9/99 (see erata file)

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) +

**Attachment A: Emission Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name:** E. G. Hill Company, Inc.  
**Source Address:** 2700 Peacock Rd. Richmond, IN 47374  
**SSOA No.:** 177-33017-00007  
**Reviewer:** Bruce Farrar

SSOA Limited  
Fuel Usage  
MMCF/yr  
**1115.0**

Unit	Maximum Heat Input Capacity (MMBtu/hr)	High Heat Value (MMBtu/MMscf)	Potential Throughput (MMcf/yr)
Boiler #1	53.740	1020	461.53
Boiler #2	28.620	1020	245.80
Boiler #3	24.960	1020	214.36
<b>Totals</b>	<b>107.32</b>		<b>921.69</b>

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	direct PM2.5*	SO2	NOx	VOC	CO
	1.9	7.6	7.6	0.6	100	5.5	84
					**see below		
Potential Emission in tons/yr	1.06	4.24	4.24	0.33	55.75	3.07	46.83

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

PM2.5 emission factor is filterable and condensable PM2.5 combined.

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

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

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

Emission (tons/yr) = [SSOA Limited Fuel Usage (MMCF/yr)] \* [Emission Factor (lb/MMCF)] / [2,000 lb/ton]

Emission Factor in lb/MMcf	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.171E-03	6.690E-04	4.181E-02	1.004E+00	1.896E-03

Emission Factor in lb/MMcf	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.788E-04	6.133E-04	7.805E-04	2.119E-04	1.171E-03

Methodology is the same as page 1.

<b>Potential Emission of Total HAPs (tons/yr)</b>	<b>1.05E+00</b>
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The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Emission Factor in lb/MMcf	Greenhouse Gas		
	CO2	CH4	N2O
	120,000	2.3	2.2
Potential Emission in tons/yr	66,900	1.3	1.2
Summed Potential Emissions in tons/yr	66,903		
CO2e Total in tons/yr	67,307		

**Methodology**

The N2O Emission Factor for uncontrolled is 2.2. The N2O Emission Factor for low Nox burner is 0.64.

Greenhouse Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

CO2e (tons/yr) = CO2 Potential Emission ton/yr x CO2 GWP (1) + CH4 Potential Emission ton/yr x CH4 GWP (21) + N2O Potential Emission ton/yr x N2O GWP (310).



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

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

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

**TO:** Lindley Mann  
EG Hill Company, Inc  
PO Box 998  
Richmond, IN 47375

**DATE:** May 30, 2013

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

**SUBJECT:** Final Decision  
SSOA  
177-33017-00007

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](mailto:jbrush@idem.IN.gov).

Final Applicant Cover letter.dot 11/30/07

# Mail Code 61-53

IDEM Staff	DPABST 5/30/2013 EG Hill Company, Inc 177-33017-00007 (final)		Type of Mail:  <b>CERTIFICATE OF MAILING ONLY</b>	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		Lindley Mann EG Hill Company, Inc PO Box 998 Richmond IN 47375 (Source CAATS) (CONFIRM DELIVERY)										
2		Mr. Thomas Lee Clevenger 4005 South Franks Lane Selma IN 47383 (Affected Party)										
3		Richmond City Council and Mayors Office 50 North 5th Street Richmond IN 47374 (Local Official)										
4		Wayne County Commissioners 401 East Main Street Richmond IN 47374 (Local Official)										
5		Mr. Randall Shrock 2764 Abington Pike Richmond IN 47374 (Affected Party)										
6		Wayne County Health Department 401 E. Main Street Richmond IN 47374-4388 (Health Department)										
7		Mark & Tamara Webb 1825 Peacock Richmond IN 47374 (Affected Party)										
8		Allen Hill 1839 Peacock Richmond IN 47374 (Affected Party)										
9		Barbara Kennedy 1843 Peacock Richmond IN 47374 (Affected Party)										
10		Jackie & Donna Bledsoe 1845 Peacock Richmond IN 47374 (Affected Party)										
11		James & Bernadine Brann 1901 Peacock Richmond IN 47374 (Affected Party)										
12		Robert & Tami Johnson 300 NW 18th St Richmond IN 47374 (Affected Party)										
13		Deutsche Bank Trust 1821 Peacock Rd Richmond IN 47374 (Affected Party)										
14		Douglas Snyder 1823 Peacock Rd Richmond IN 47374 (Affected Party)										
15		Ricky & Tina Smith 1833 Peacock Rd Richmond IN 47374 (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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Lucinda 1837 Peacock Rd Richmond IN 47374 (Affected Party)										
2		George & Lucinda Callahan 1725 Hilldell Richmond IN 47374 (Affected Party)										
3		James Taggart 1727 Hilldell Richmond IN 47374 (Affected Party)										
4		Kornelia Carpenter 1731 Hilldell Richmond IN 47374 (Affected Party)										
5		Jesus Melendez 315 NW 18th St Richmond IN 47374 (Affected Party)										
6		Lisa Jenkins 309 NW 18th St Richmond IN 47374 (Affected Party)										
7		Betty Clark 1623 Peacock Richmond IN 47374 (Affected Party)										
8		Jeremy & Leann Parker 1627 Peacock Richmond IN 47374 (Affected Party)										
9		Madelaine Rummel 1625 Peacock Richmond IN 47374 (Affected Party)										
10		David & Marilyn Brann 1700 Peacock Richmond IN 47374 (Affected Party)										
11		Linda Carpenter 1701 Hilldell Richmond IN 47374 (Affected Party)										
12		Kevin Sweet 310 Park Terrace Dr Richmond IN 47374 (Affected Party)										
13		Malcolm Moore 304 Grace Drive Richmond IN 47374 (Affected Party)										
14		Michael & Erin Orr 1604 Peacock Richmond IN 47374 (Affected Party)										
15		Michael Schubert 1620 Peacock Richmond IN 47374 (Affected Party)										

Total number of pieces Listed by Sender <b>75</b>	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		William & Jean 1617 Peacock Richmond IN 47374 (Affected Party)										
2		Edwin & Mildred Miller 406 Park Terrace Dr Richmond IN 47374 (Affected Party)										
3		David & Barbara Gray 400 Park Terrace Richmond IN 47374 (Affected Party)										
4		Daniel & Denise Bane 322 Park Terrace Richmond IN 47374 (Affected Party)										
5		Richard & Susan Nisewonder 318 Park Terrace Dr Richmond IN 47374 (Affected Party)										
6		Michelle & Ensel Moore 316 Park Terrace Richmond IN 47374 (Affected Party)										
7		Thomas & Diana Wildey 430 Park Terrace Dr Richmond IN 47374 (Affected Party)										
8		Jan & Mary Williams 424 Park Terrace Dr Richmond IN 47374 (Affected Party)										
9		Everett Isaacs 420 Park Terrace Dr Richmond IN 47374 (Affected Party)										
10		Elizabeth Craig 416 Park Terrace Dr Richmond IN 47374 (Affected Party)										
11		Jim Coyner 412 Park Terrace Dr Richmond IN 47374 (Affected Party)										
12		Dr. Tubesing 3100 College Corner Richmond IN 47374 (Affected Party)										
13		Wayne County Commissioners 401 E Main St Richmond IN 47374 (Affected Party)										
14		State of Indiana - Administration 402 W Washington St Indianapolis IN 46204 (Affected Party)										
15		Kenneth Jeffers & Shelby Cloyd 436 Park Terrace Dr Richmond IN 47374 (Affected Party)										

Total number of pieces Listed by Sender  <b>75</b>	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Kent & Mary Ann 434 Park Terrace Richmond IN 47374 (Affected Party)										
2		Clinton & Margaret Allen 2310 NW B St Richmond IN 47374 (Affected Party)										
3		Charles & Dorothy Chris 2306 NW B St Richmond IN 47374 (Affected Party)										
4		Winandy Greenhouse 2211 Peacock Rd Richmond IN 47374 (Affected Party)										
5		#1 Polymer Source 2117 Peacock Rd Richmond IN 47374 (Affected Party)										
6		RPL/City of Richmond 50 N 5th St Richmond IN 47374 (Affected Party)										
7		Roger & Jill McCashland 2410 NW B St Richmond IN 47374 (Affected Party)										
8		Anna Brinker 2404 NW B St Richmond IN 47374 (Affected Party)										
9		Sandra Poe 2400 NW B St Richmond IN 47374 (Affected Party)										
10		Amie Parker 2326 NW B St Richmond IN 47374 (Affected Party)										
11		Kathryn Mayer 2320 NW B St Richmond IN 47374 (Affected Party)										
12		Jerome & Ramona Benson 2516 NW B St Richmond IN 47374 (Affected Party)										
13		Beverle McGunegill 2512 NW B St Richmond IN 47374 (Affected Party)										
14		Keith & Mary Johnson 2500 NW B St Richmond IN 47374 (Affected Party)										
15		Robert & Gwendolyn Sharpe 2424 NW B St Richmond IN 47374 (Affected Party)										

Total number of pieces Listed by Sender  <b>75</b>	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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1		Steven & Regina 2414 NW B St Richmond IN 47374 (Affected Party)										
2		James & Sandra Resh 2630 NW B St Richmond IN 47374 (Affected Party)										
3		Jay & Deborah Martin 2620 NW B St Richmond IN 47374 (Affected Party)										
4		Erskin & Russell Brockman 2610 NW B St Richmond IN 47374 (Affected Party)										
5		Dickman Properties LLC 2600 NW B St Richmond IN 47374 (Affected Party)										
6		Michael & Amanda Thomas 2520 NW B St Richmond IN 47374 (Affected Party)										
7		Patricia Moore 200 NW 28th St Richmond IN 47374 (Affected Party)										
8		Edward & Sue Ann Reagan 2730 NW B St Richmond IN 47374 (Affected Party)										
9		Curtis & Debra Haynes 2720 NW B St Richmond IN 47374 (Affected Party)										
10		Dale & Barbara Norris 2710 NW B St Richmond IN 47374 (Affected Party)										
11		Leonard & Olga Sandlin 2700 NW B St Richmond IN 47374 (Affected Party)										
12		Sally Hutton 50 North 5th St Richmond IN 47374 (Affected Party)										
13		Ken Paust Wayne County Commissioners 401 East Main St Richmond IN 47374 (Affected Party)										
14		Denny Burns Wayne County Commissioner 401 East Main St Richmond IN 47374 (Affected Party)										
15		Mary Ann Butters Wayne County Commissioner 401 East Main St Richmond IN 47374 (Affected Party)										

Total number of pieces Listed by Sender  <b>75</b>	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 <b>Domestic Mail Manual R900, S913, and S921</b> for limitations of coverage on inured and COD mail. See <b>International Mail Manual</b> for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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